



**University Corporation: Workplace Violence Prevention Program
Ryan Ranch**

I. Purpose: University Corporation "Corporation" is committed to cultivating a civil, non-violent learning, working, and social environment, devoid of any forms of discrimination and conduct that could be considered harassing, coercive, or disruptive in the workplace. The purpose of this plan is to: Identify the names and job titles of the persons responsible for the implementation and maintenance of the Workplace Violence Prevention Program (WVPP), highlight how employees can report violent incidents, threats, or other workplace violence concerns, and how to respond to reports, reinforce against unlawful retaliation for reporting, in good faith, violent incidents, threats, or other workplace violence concerns, and participating in any related investigations of such reports, outline procedures to respond to actual or potential workplace violence emergencies, detail training requirements about this plan, including the frequency of training, outline procedures to identify and evaluate workplace violence hazards, and communicate post-incident response and investigation processes. We strongly urge all members of the University community to promptly report any incidents of workplace violence. Each report will be treated with the utmost seriousness and thoroughly investigated.

II. Workplace Violence Prevention Requirements: California Senate Bill 553 (SB 553) amended California Labor Code section 6401.7 and created section 6401.9 and the new requirements (Workplace Violence Prevention) found in those Labor Code sections will be in effect and enforceable on July 1, 2024.

III. Scope: The WVPP is applicable to all Corporation employees and volunteers as well as persons present in Corporation worksites. The WVPP does not apply to Corporation employees when telecommuting from a location of the employee's choice, not under the control of the Corporation. CSUMB stateside is responsible for applying similar practices to their respective programs and activities.

IV. Definitions:

- A. **Emergency:** Unanticipated circumstances that can be life-threatening or pose a risk of significant injuries/harm to employees or other persons.
- B. **Engineering Controls:** An aspect of the built space or a device that removes a hazard from the workplace or creates a barrier between the employee and the hazard.
- C. **Log:** The violent incident log required by Labor Code Section 6401.9.
- D. **Procedural Controls:** These refer to the policies, procedures, and protocols established to prevent or manage violent incidents in the workplace. These controls are typically part of a comprehensive violence prevention program and include:
 - 1. **Reporting and Documentation System:** A system for reporting and documenting acts of violence. This includes procedures for workers to follow when lodging a complaint with the employer, including how and when to report.
 - 2. **Response Procedures:** Procedures for responding to instances of violence. This can include steps for immediate response, investigation, and follow-up.
 - 3. **Training and Education:** Procedures for ensuring employee education and training on violence prevention. This includes training in recognizing potential risks, understanding violence prevention policy, and knowing what to do in the event of a violent incident.

4. **Risk Assessment and Control Measures:** Procedures for identifying contributing factors to workplace violence, assessing those factors, and selecting controls and prevention measures.
- E. **Threat of Violence:** Any verbal or written statement, including, but not limited to, texts, electronic messages, social media messages, or other online posts, or any behavioral or physical conduct, that conveys an intent, or that is reasonably perceived to convey an intent, to cause physical harm or to place someone in fear of physical harm, and that serves no legitimate purpose.
- F. **Workplace Violence:** This refers to any act or threat of violence that occurs in a place of employment. This term encompasses, but is not limited to, the following:
 1. The threat or use of physical force against an individual that results in, or has a high likelihood of resulting in, injury, psychological trauma, or stress, irrespective of whether an injury is sustained.
 2. An incident involving the threat or use of a firearm or other dangerous weapon, including the use of common objects as weapons, regardless of whether an injury is sustained.
 3. Workplace violence falls into four categories, depending on the status of the person(s) committing the act:
 - a. **Type 1 Violence:** Workplace violence committed by a person who has no legitimate business at the worksite and includes violent acts by anyone who enters the workplace with the intent to commit a crime.
 - b. **Type 2 Violence:** Workplace violence directed at employees by students or visitors.
 - c. **Type 3 Violence:** Workplace violence against an employee by a present or former employee, supervisor, or manager.
 - d. **Type 4 Violence:** Workplace violence committed in the workplace by a person who does not work there but has or is known to have had a personal relationship with an employee.
 4. The Corporation defines these behaviors as follows:
 - a. **Intimidation:** An act towards another person, the purpose of which is to coerce, and the result of which could reasonably cause the other person to fear for their safety or the safety of others.
 - b. **Threat of Violence:** A communicated intent to inflict physical or other harm on any person or property.
 - c. **Act of Violence:** Exercise of physical force against another person or property.
 5. The term “workplace violence” does not include lawful acts of self-defense or defense of others.

V. Workplace Violence Incidents:

A. Reporting Workplace Violence:

1. Members of the Corporation and University community who witness or perceive an act of workplace violence on campus are encouraged to report such incidents of workplace violence through one or more of the following channels: a) Dial 9-1-1 (when safe to do so). b) Use the Emergency Blue Phones (only available on CSUMB’s main campus) Report to their appropriate administrator, resident advisor, or faculty instructor.
2. Members of the Corporation and University community who witness or perceive an act of workplace violence on campus can also report such incidents of workplace violence to the Monterey Police Department at (831) 646-3914 (Ryan Ranch Employees). Anonymous tips can also be submitted by calling Cal/OSHA at 1(800) 963-9424 or emailing them at InfoCons@dir.ca.gov and/or DOSHEnforcement@dir.ca.gov.
3. For situations that do not involve an actual or imminent act of workplace violence or threat of violence, the incident should be reported promptly by submitting a report to Corporation HR who will coordinate with CSUMB Enterprise Risk Management and other stateside threat assessment teams as needed.

4. Individuals can report incidents verbally or in writing. However, a written report containing details about the incident is recommended. Individuals may also report incidents anonymously. University Corporation and/or CSUMB will investigate anonymous reports to the extent possible given the level of detail contained or not contained in the report.
5. All incidents, regardless of how they are reported, will be investigated pursuant to Section E of this policy below for the purpose of post-incident response and investigation.
6. Retaliation for reporting an instance of workplace violence is strictly prohibited. Any member of the Corporation who retaliates against someone for reporting workplace violence is subject to discipline, up to and including non-retention, expulsion, and/or immediate removal from the workplace.
7. To prepare for a workplace violence emergency and enhance the likelihood that a member of the University community will report an incident, the University will undertake the following actions:
 - i. Ensure that workplace violence prevention policies and procedures are discussed during new employee, student, and volunteer orientations.
 - ii. Require employees to complete workplace violence prevention training.
 - iii. Require all departments and administrative units to discuss, review, and communicate with their employees about security protocols and workplace violence hazards and mitigation measures in their work areas.
 - iv. Post and distribute workplace violence prevention information.
 - v. Communicate at the beginning of the semester to Corporation employees/volunteers/contractors about how individuals can report a violent incident, threat, or other workplace violence concern without fear of reprisal or adverse action.

B. **Emergency Communication:** University Corporation has methods of communication to notify employees of an emergency situation, and these could be used to warn employees of a workplace violence hazard or emergency in progress.

1. Timely Warning Policy

The [CSU systemwide Timely Warning Policy](#) has been adopted and is followed by all campuses of the California State University system. The policy describes the procedures that will be used to provide members of the community with information to aid in preventing them from becoming victims of crimes posing a serious or ongoing threat to the campus communities. It is intended to provide faculty, staff, and students with timely information about Clery reportable crimes occurring within the defined Clery geography of their campuses, and to comply with the Timely Warning requirements of the Jeanne Clery Act.

Timely Warning Procedures - The federal law known as the Clery Act, and the California State University Clery Policy, require that CSUMB will keep their campus communities informed by providing a timely warning. See CSUMB Timely Warning Procedures here:

https://drive.google.com/file/d/1ZcnScuYNF4aj9D_EBpZbEvzKHd6NcSlo/view?usp=sharing

2. Emergency Notification Policy

The [CSU systemwide Emergency Notification Policy](#) has been adopted and is followed by all campuses of the California State University system. The policy describes the procedures that will be used to immediately notify the campus community upon the confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students and/or employees occurring on the campus, as required by the Clery Act.

Emergency Notification Procedures - Any member of the campus community with information believed to constitute a significant emergency or a dangerous situation that poses an imminent or immediate threat shall report the information to the University Police Department (UPD) and/or by calling "911." See the CSUMB EEmergency Notification Procedures here: <https://drive.google.com/file/d/1YjNhmBy0HqjozF7aXwr08zkwxSYaukws/view?usp=sharing>

3. OTTERAlert

OTTERalert is CSUMB's emergency alert system. It delivers emergency alerts via email, text, and an outdoor speaker system to all members of the CSUMB community. Depending on the situation, the campus speaker system may be used.

Website - [CSUMB.edu/emergency](https://www.csumb.edu/emergency) may be used for notifications and updates. In the event of an emergency, every page of the CSUMB website displays a banner with emergency alerts and updates.

OTTERalert texts come from 77295, 226787, or 65513. To stop receiving the text alerts, reply STOP to an OTTERalert message. CSUMB employees and students are encouraged to [enroll in text alert](#).

When information is available and appropriate, these alerts will:

- i. Provide information such as, but not limited to the type of incident, when and where it occurred, and next steps or instructions.
- ii. Advise if evacuation or sheltering plans are appropriate for the situation.
- iii. Inform recipients about obtaining assistance from the UPD or other law enforcement agencies.
- iv. OTTERalert emails are sent from csumb@email.getrave.com or noreply@genasys.com. CSUMB employees and students automatically receive OTTERalert emails to their campus email account.

C. Violent Incident Log:

1. University Corporation is primarily responsible for maintaining the Log, which will be used to record every workplace violence incident. The Log will include the following information:
 - a. The date, time, and location of the incident.
 - b. Information about the person completing the Log, including their name, job title, and the date completed.
 - c. The workplace violence category type or types involved in the incident, as defined above (i.e. Type 1, 2, 3 or 4).
 - d. A detailed description of the incident.
 - e. A classification of who committed the violence, including whether the perpetrator was a client or customer, family or friend of a client or customer, stranger with criminal intent, coworker, supervisor or manager, partner or spouse, parent or relative, or another perpetrator.
 - f. A classification of circumstances at the time of the incident, including, but not limited to, whether the employee was completing usual job duties, working in poorly lit areas, rushed, working during a low staffing level, isolated or alone, unable to get help or assistance, working in a community setting, or working in an unfamiliar or new location.

- g. A classification of where the incident occurred, such as in the workplace, parking lot or other area outside the workplace, or other area.
- h. The type of incident, including, but not limited to, whether it involved any of the following:
 - i. Physical attack without a weapon, including, but not limited to, biting, choking, grabbing, hair pulling, kicking, punching, slapping, pushing, pulling, scratching, or spitting.
 - ii. Attack with a weapon or object, including, but not limited to, a firearm, knife, or other object.
 - iii. Threat of physical force or threat of the use of a weapon or other object.
 - iv. Sexual assault or threat, including, but not limited to, rape, attempted rape, physical display, or unwanted verbal or physical sexual contact.
 - v. Animal attack.
 - vi. Other.
- i. Consequences of the incident, including, but not limited to:
 - i. Whether security or law enforcement was contacted and their response.
 - ii. Actions taken to protect employees from a continuing threat or from any other hazards identified because of the incident.
 - iii. Whether there were any injuries as a result of the incident, and if so, a description of the injuries.
 - iv. Whether emergency responders other than law enforcement were contacted, such as Fire Department, Paramedics, or on-site first-aid certified personnel, and if so, a brief explanation of their involvement.
- j. Information about the person completing the Log, including their name, job title, and the date completed.

D. Post-Incident Response and Investigation: After a workplace violence incident, a combination of the Chief of UPD or local police department, Director of HR, and Enterprise Risk Management, will work together to implement the following post-incident procedures:

1. Work with departments to provide supportive measures and/or assistance to the victim.
2. Visit the scene of an incident as soon as it is safe and practicable.
3. Interview involved parties, such as employees, witnesses, law enforcement, and/or security personnel.
4. Review security footage from existing security cameras, if applicable.
5. Examine the workplace for security risk factors associated with the incident, including any previous reports of inappropriate behavior by the perpetrator.
6. Determine the cause of the incident.
7. Take corrective action to prevent similar incidents from occurring.
8. Record the findings and ensure corrective actions are taken.
9. Obtain any reports completed by law enforcement.
10. Review all previous similar incidents for pattern and learning.
11. Ensure that personal identifying information is safeguarded when entering information into the Log or report drafted for the WVPP. This includes information that would reveal the identification of any person involved in a violent incident, such as the person's name, address, email address, telephone number, social security number, or other information that, alone or in combination with other publicly available information, reveals the person's identity.

VI. Workplace Violence Prevention and Mitigation

A. The Workplace Violence Prevention and Mitigation Team (WVPMT):

In connection with the Post-Incident Response and Investigation, CSUMB will engage the Emergency Management Team (EMT) to evaluate any threats and/or violence in the campus workplace. This group includes all Corporation management-level staff. In addition to its normal operations, the EMT will review the frequency and severity of threatening or hostile situations that may lead to violent acts by persons in the workplace. Furthermore, Corporation EMT work with the stateside emergency operations center, ensuring coordinated response efforts for incidents impacting both stateside and Corporation employees.

B. Training:

1. Corporation will provide training to its employees:
 - a) When the WVPP is first established, and then annually.
 - b) When a new employee joins Corporation.
 - c) Whenever a new or previously unrecognized workplace violence hazard has been identified and when changes are made to the plan. The additional training may be limited to addressing the new workplace violence hazard or changes to the plan.
2. The training will review and explain the definitions set forth in Section IV above and the requirements listed below:
 - a) How to obtain a copy of the WVPP at no cost and how to participate in the development and implementation of the WVPP.
 - b) How to report workplace violence incidents or concerns to the Corporation, University or law enforcement without fear of reprisal.
 - c) The warning signs of potential workplace violence.
 - d) Workplace violence hazards specific to employees' jobs based on the type of workplace, any corrective measures the employer has implemented, how to seek assistance to prevent or respond to violence, and strategies to avoid physical harm.
 - e) The Log and how to obtain copies of records pertaining to WVPP hazard identification, evaluation and correction, training records, and violent incidents.
 - f) Opportunities Corporation and/or CSUMB has interactive questions and answers with a person knowledgeable about the WVPP.
 - g) Strategies to avoid and prevent workplace violence and physical harm, such as:
 - (i) How to recognize workplace violence hazards including the risk factors associated with the four types of workplace violence.
 - (ii) Ways to defuse hostile or threatening situations.
 - h) Providing Contact information for persons knowledgeable about the WVPP.

C. Workplace Violence Physical Hazard Identification and Evaluation

1. The Office of Enterprise Risk Management (ERM), in coordination with UPD, HR, and/or Facilities Management, will oversee the identification of workplace violence physical hazards.
2. Members of the University community can report workplace violence hazards or concerns through the following channels:
 - a) The university's Workplace Violence Incident Reporting process. Community members may report anonymously.
 - b) The University Police Department
 - c) Local law enforcement agencies
 - d) By emailing InfoCons@dir.ca.gov and/or DOSHEnforcement@dir.ca.gov
3. ERM administrators and staff will review and document the outcomes of all such reports.

4. ERM will coordinate and conduct annual workplace walks with the aim of identifying and documenting physical workplace hazards, which may increase the likelihood of a crime. As part of the inspection, the areas reviewed and the administrators and staff who conducted the review will be documented.
5. ERM administrators and staff will also review and assess new or previously unrecognized hazards.
6. ERM along with UPD, HR, and/or Facilities Management will review for the following:
 - a) The need for violence surveillance measures, such as mirrors and cameras (annually).
 - b) Procedures for employee response during a robbery or other criminal act.
 - c) Procedures for reporting suspicious persons or activities.
 - d) The effective location and functioning of emergency buttons and alarms.
 - e) Posting of emergency telephone numbers for law enforcement, fire, and medical services.
 - f) Inspections after any workplace violence incident, which may include:
 - (i) The adequacy of workplace security systems includes door locks, entry codes or ID Card readers, security windows, physical barriers, and restraint systems.
 - (ii) The effectiveness of systems and procedures that warn others of actual or potential workplace violence danger or summon assistance, e.g., alarms or panic buttons.
 - (iii) The availability of employee escape routes.
 - (iv) Access to and freedom of movement within the workplace by non-employees, including recently discharged employees or persons with whom one of our employees is having a dispute.
 - (v) The frequency and severity of employees' reports of threats of physical or verbal abuse by managers, supervisors, or other employees.
 - (vi) Any prior violent acts, threats of physical violence, verbal abuse, property damage, or other signs of strain or pressure in the workplace.

D. **Workplace Violence Physical Hazard Correction:** The Office of Facilities Management and Development will oversee the evaluation and timely correction of identified workplace violence physical hazards.

1. All corrective actions taken will be documented, dated, and recorded.
2. Corrective measures for workplace violence hazards will be specific to a given work area. For example, these may include:
 - a) Improving lighting around and within the workplace.
 - b) Installing and utilizing surveillance measures, such as cameras and mirrors, to provide information about activities inside and outside the workplace and to deter criminal activity.
 - c) Providing workplace security systems, such as door locks, secure windows, physical barriers, emergency alarms, and restraint systems.
 - d) Posting emergency telephone numbers for law enforcement, fire, and medical services.
 - e) Installing effective systems to warn others of a potential violence danger or to summon assistance, e.g., alarms or panic buttons.

E. **Workplace Violence Procedural update focused on Hazard Identification, Evaluation, and Correction**

Procedural hazards refer to potential risks or dangers that can occur due to the procedures followed in a workplace or during a process.

1. The WVPMT team will collaborate to ensure that Workplace violence hazards are evaluated and corrected in a timely manner, and oversee the identification, evaluation, and correction of workplace violence procedural hazards.
2. Members of the University community can report Procedural hazards hazards or concerns through:
 - a) The university's Workplace Violence Incident Reporting process. Community members may report anonymously using this [form](#).
 - b) The University Police Department
 - c) Local law enforcement agencies
 - d) By emailing InfoCons@dir.ca.gov and/or DOSHEnforcement@dir.ca.gov
3. The WVPMT team will review and document the outcomes of all such reports.

VII. Responsibilities: The following administrative positions have the authority and responsibility for implementing all or specific portions of the WVPP.

- A. **Human Resources Director:** This role is responsible for the implementation and overall coordination of University Corporation's WVPP, which includes assessing the effectiveness of the WVPP as well as its compliance with all applicable federal, state, and CSU laws and regulations. Other duties include:
 1. HR has primary responsibility for ensuring the functionality of procedures established to identify and receive reports related to procedural workplace violence hazards.
 2. Investigating reported acts or threats of violence received directly or in connection with UPD and taking appropriate action.
 3. Implementing procedures to prevent retaliation of those who submitted reports.
 4. HR professionals develop, interpret, and enforce organizational policies related to workplace violence. They are responsible for handling terminations, hiring, promotion, and zero-tolerance protocols.
 5. HR is responsible for organizing training programs, which help educate students and employees about the signs of potential violence, how to avoid violent situations, and what to do if they find themselves in a potentially violent situation.
 6. HR professionals play an important role by asking questions and being involved with the goal of early intervention and prevention of workplace violence incidents.
 7. HR provides support to employees who have been affected by workplace violence. This can include arranging for counseling services, facilitating communication between the employee and management, and assisting with any necessary paperwork.
 8. Chairing the WVPP Working Group which will assess the effectiveness of the WVPP as well as its compliance with all applicable federal, state, and CSU laws and regulations.
- B. **Chief of the Police Department (UPD):** The Chief's primary responsibility is to implement measures to ensure the University is prepared to respond to, investigate, and potentially mitigate workplace violence incidents. Other responsibilities include:
 1. Developing procedures on how workplace violence investigations will be conducted, recorded, and the results thereof disseminated to the proper University stakeholder.
 2. Receiving and investigating all reports of acts or threats of violence.
 3. Recording reports of acts or threats of violence in the Log and maintaining the Log.
 4. Issuing timely notices and/or emergency notifications related to workplace violence in connection with the CSU policy EO 1107 "Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act", including instructions for how members of the University community should respond to such emergencies.

5. Chairing the Emergency Management Team.
- C. UPD's **Director of Emergency Management** has primary responsibility for developing and implementing procedures on how to respond to violent emergencies, including evacuation and/or sheltering in place plans. Other duties include assisting the Clery Director in issuing emergency warnings related to workplace violence incidents.
- D. **Risk Manager:** The office Risk Management & Compliance has primary responsibility for ensuring that all training associated with the WVPP meets all applicable federal, state, and CSU laws and regulations. Other responsibilities include:
1. Ensuring opportunities exist for the active engagement of members of the University community in the development and ongoing review of the WVPP and the development and functionality of reporting mechanisms.
 2. Participate in University efforts regarding post-incident response and review.
 3. Coordinating all required Plan reviews, which include reviews annually, after a workplace violence incident, and when a new hazard becomes known.
- E. **Director of Environmental Health and Safety:** The Director of Environmental Health & Safety has primary responsibility for ensuring the functionality of procedures established to identify and receive reports related to physical workplace violence hazards. Other duties include:
1. Maintaining records of workplace violence physical inspections.
 2. Conducting all required assessments, which include assessments of when the WVPP is initially implemented, after an act of workplace violence, and when a new hazard becomes known.
 3. The office of ERM has primary responsibility for maintaining the University's OSHA 300 log. Ensuring reporting of serious injury or fatality per Title 8 CCR Sections 330(a) and 342.
- F. **Director of Facilities Management:** Has responsibility of ensuring the implementation of corrective actions to confirmed workplace violence hazards as noted above.
- G. **Director of Events, Facility Operations and Contracted Services:** Has primary responsibility for coordinating the implementation of the WVPP with other employers who have employees in the workplace of the University.
- H. **Management Plan Personnel:** All MPPs and appropriate administrators have primary responsibility for implementing and maintaining the WVPP in their administrative areas, ensuring that faculty and staff have access to training and written materials concerning University safety policies, procedures, and practices; assault prevention; and guidelines for resolving violent confrontation. Additional responsibilities include:
1. Informing University Police of all threats or acts of violence, even if the situation has been resolved.
 2. Ensuring all employees are trained on the WVPP.
 3. Discussing regularly with all personnel issues related to workplace security, including identification of concerns/hazards, discussion of recent incidents and/or reviews of safety procedures.
 4. Training and/or counseling faculty and staff whose performance is deficient in complying with work practices designed to increase workplace security.
- I. **All University Corporation Employees:** All employees of the University Corporation are responsible for using safe work practices, following all directives, policies, and procedures concerning campus security, and assisting in maintaining a safe and secure work and learning environment. To

encourage employees to comply with work practices designed to make the workplace more secure and to not engage in threats or physical actions which create a workplace violence hazard for others on campus, University Corporation will:

1. Communicate and provide training concerning the WVPP.
2. Provide training and/or counseling to members of the community whose performance is deficient in complying with work practices designed to enhance workplace security.
3. Discipline workers, as permitted by applicable laws, rules, regulations, policies and collective bargaining agreements, for failure to comply with workplace violence practices.

VIII. General Provisions:

- A. **Employee Involvement:** University Corporation will take the following measures to obtain or attempt to obtain the active involvement of employees, and authorized employee representatives, in developing and implementing the WVPP:
1. Ensure employees, and authorized employee representatives, have opportunities to participate in: a) Identifying, evaluating, and determining corrective measures to prevent workplace violence. b) Designing and implementing training. c) reviews of ways of reporting and/or investigating workplace violence incidents.
 2. Communicate all policies and procedures within the WVPP to all employees.
 3. Require all employees to follow the WVPP and assist in maintaining a safe work and learning environment.
 4. Ensure the WVPP addresses the hazards and corrective measures for all work areas/operations and learning environments.
- B. **Employee Compliance:** To ensure that employees comply with the WVPP and do not engage in threats or physical actions that create a workplace violence hazard for others in the workplace, the University will:
1. Train employees regarding the elements of the WVPP.
 2. Develop and implement measures to promote compliance with the WVPP.
 3. Retrain employees whose safety performance is deficient with the WVPP.
 4. Recognize employees who demonstrate safe work practices that promote the WVPP in the workplace.
 5. Counsel and/or discipline employees, as permitted by applicable laws, rules, regulations, policies and collective bargaining agreements, for failure to comply with the WVPP.
- C. **Access to the Written WVPP and Requested Records**
1. The WVPP will be in writing, available and accessible to members of the University community, authorized employee representatives, and representatives of Cal/OSHA, through the University's website, including a link to the WVPP on University Corporation's home page.
 2. The University will make the following records, subject to redaction of Personal Identifiable Information ("PII"), available to employees, employee representatives, and students, upon request and without cost, for examination and copying within 15 calendar days of a request: a) Records of workplace violence hazard identification, evaluation, and correction. b) Training records. c) Violent incident logs.
 3. Requests should be made to the Office of Risk Management and Compliance.
- D. **Recordkeeping**
1. Enterprise Risk Management will create and maintain records of workplace violence hazard identification, and evaluation for a minimum of five (5) years.
 2. HR will create and maintain training records for a minimum of one (1) year and include the following: a) Training dates. b) Contents or a summary of the training sessions. c) Names and job titles of all people attending the training sessions.
 3. FMD will create and maintain records of workplace violence hazard correction, for a minimum of five (5) years.

4. UPD will maintain violent incident logs and workplace violence incident investigations for a minimum of five (5) years. These records shall not contain medical information per subdivision (j) of section 56.05 of the Civil Code and will be redacted for PII.
5. University Corporation will make all records of workplace violence hazard identification, evaluation, and correction; training, incident logs, and workplace violence incident investigations required by LC section 6401.9(f), available to Cal/OSHA upon request for examination and copying.

E. WVPP Review

1. HR, UPD, ERM and Risk Management and Compliance will ensure that the WVPP is reviewed for effectiveness: a) At least annually. b) When a deficiency is observed or becomes apparent. c) After a workplace violence incident.
2. Review and revision of the WVPP will include a) Review of incident investigations and the Log. b) Assessment of the effectiveness of security systems, including alarms, emergency response, and security personnel availability (if applicable). c) Review that violence risks are being properly identified, evaluated, and corrected. Any necessary revisions are made promptly and communicated to all employees.
3. Coordination with Other Employers: University Corporation will communicate the WVPP to other employers on campus to ensure that those employers and their employees understand their respective roles as provided in the WVPP, which includes the reporting and investigation of any potential workplace violence incident.

IX. Accountability:

Any faculty, staff, student, or volunteer who engages in an act or threat of violence or who retaliates against another member of the University community for reporting a workplace violence incident or concern is subject to disciplinary action under university policies and/or applicable collective bargaining agreements, up to non-retention or expulsion. If a contractor, vendor, or visitor engages in an act or threat of violence or retaliates against another member of the University community for reporting a workplace violence incident or concern, they may be immediately barred from university-owned or leased property and have their business relationship with the University suspended or terminated.