



1 **362.4 Cal Poly Partners: Workplace Violence Prevention Plan (WVPP):**

2 **362.4.1 Purpose:** Cal Poly Partners is committed to cultivating a civil, non-violent learning, working, and social
3 environment devoid of any forms of conduct, including discrimination, which could be considered harassing,
4 coercive, or disruptive. The principles of civility and mutual respect underpin our pursuit of excellence in teaching
5 and learning. These principles not only contribute to a safe and productive workplace but also foster a healthy
6 campus climate for all. Our Workplace Violence Prevention Plan (“WVPP”) addresses and implements corrective
7 measures for workplace violence hazards specific to Cal Poly Partners work areas and operations.

8 **362.4.2 Workplace Violence Prevention Requirements:** California Senate Bill 553 (SB 553) amended California Labor
9 Code Section 6401.7 and created Section 6401.9, and the new requirements (Workplace Violence Prevention Plan)
10 found in those Labor Code sections will be in effect and enforceable on July 1, 2024.

11 **362.4.3 Scope:** The WVPP is applicable to the entire Cal Poly Partners community, including Employees, volunteers,
12 contractors, and vendors, when engaged in Cal Poly Partners academic, business, or co-curricular programs and
13 activities.

14 **362.4.4 Definitions:**

- 15 A. **Act of Violence:** The use or exercise of physical force or mental stress against another person.
- 16 B. **Bullying:** Offensive or malicious behavior through persistent actions typically meant to undermine,
17 intimidate, or demean the recipient.
- 18 C. **Emergency:** An emergency is an unanticipated circumstance that can be life-threatening or pose a risk of
19 significant injuries or harm to an individual. An emergency refers to unforeseen circumstances that require
20 immediate action or an urgent need for assistance or relief.
- 21 D. **Employees:** This term includes Cal Poly Partners full-time, part-time, benefitted, non-benefitted, temporary,
22 intermittent, student and additional compensation positions.
- 23 E. **Engineering Controls:** These refer to the physical modifications made to the workplace or the
24 implementation of certain tools and technologies to mitigate the risk of violence. These controls aim to
25 either eliminate the hazard from the workplace or create a barrier between the worker and the hazard.
- 26 F. **Intimidation:** An act towards another person, the purpose of which is to coerce, and the result of which
27 could reasonably cause the other person to fear for their safety or the safety of others.
- 28 G. **Log:** The incident log required by Labor Code Section 6401.9.
- 29 H. **Members:** The Cal Poly Partners community, including Employees, volunteers, contractors, and vendors,
30 when engaged in Cal Poly Partners academic, business, or co-curricular programs and activities
- 31 I. **Procedural Controls:** These refer to the policies, procedures, and protocols established to prevent or
32 manage violent incidents in the workplace. The following controls are part of the violence prevention plan:
- 33 1. **Reporting and Documentation System:** A system for reporting and documenting acts of violence.
34 This includes procedures for Members to follow when reporting an incident to Cal Poly Partners,
35 including how and when to report.
- 36 2. **Response Procedures:** Procedures for responding to instances of violence. This includes steps for
37 immediate response, investigation, and follow-up.
- 38 3. **Training and Education:** Procedures for ensuring employees are trained in workplace violence
39 prevention. This includes training in recognizing potential risks, understanding violence prevention
40 policy, and knowing what to do in the event of a violent incident.
- 41 4. **Risk Assessment and Control Measures:** Procedures for identifying contributing factors to
42 workplace violence, assessing those factors, and selecting controls and prevention measures.
- 43 J. **Threat of Violence:** Any verbal or written statement, including, but not limited to, texts, electronic
44 messages, social media messages, or other online posts, or any behavioral or physical conduct, that conveys
45 an intent, or that is reasonably perceived to convey an intent, to cause physical harm or to place someone
46 in fear of physical harm.



- 47 K. **Workplace Violence:** This refers to any act of violence or threat of violence that occurs in a place of
48 employment. “Workplace violence” includes, but is not limited to, the following:
49 1. The threat or use of physical force against an employee that results in, or has a high likelihood of
50 resulting in, injury, psychological trauma, or stress, regardless of whether the employee sustains
51 an injury.
52 2. An incident involving the threat or use of a firearm or other dangerous weapon, including the use
53 of common objects as weapons, regardless of whether the employee sustains an injury.
54 3. Labor Code section 6401.9 outlines four types of workplace violence:
- 55 a) Type 1 violence means workplace violence committed by a person who has no legitimate
56 business at the worksite and includes violent acts by anyone who enters the workplace or
57 approaches workers with the intent to commit a crime.
58 b) Type 2 violence means workplace violence directed at employees by customers, clients,
59 patients, students, inmates, or visitors.
60 c) Type 3 violence means workplace violence against an employee by a present or former
61 employee, supervisor, or manager.
62 d) Type 4 violence means workplace violence committed in the workplace by a person who does
63 not work there but has or is known to have had a personal relationship with an employee.
- 64 4. The term “Workplace Violence” does not include lawful acts of self-defense or defense of others.
65 In the event of a conflict between a definition in the WVPP and a definition in Labor Code 6401.9,
66 the definition in Labor Code 6401.9 prevails.

67 **362.4.5 Workplace Violence Incidents:**

68 **362.4.5.1 Reporting Acts or Threats of Violence:**

- 69 1. Members who witness or perceive an act of violence or a threat of violence on campus are urged to report
70 such incidents of workplace violence through one or more of the following channels: a) Dial 9-1-1 or
71 University Police at 805-756-2281 (when safe to do so) or connect with California Polytechnic State
72 University – San Luis Obispo (Cal Poly) Police Department through the Guardian App; b) Use the emergency
73 blue light phones; or c) Report to a supervisor or Human Resources.

74 For non-emergency reporting, Members who witness or perceive an act of violence or a threat of violence on
75 campus can also report such incidents to Cal Poly EHS using the form available at <https://afd.calpoly.edu/ehs/forms>.

- 76 2. Responsible Employees under [CSU Nondiscrimination Policy](#) have a duty to promptly report all
77 incidents that may violate CSU Nondiscrimination Policy to Cal Poly’s Civil Rights & Compliance
78 Office (CRCO) at (805) 756-6770 or crco@calpoly.edu. Cal Poly Partners Employees report
79 incidents to the Human Resources office at (805) 756-1121 or cpchr@calpoly.edu.
80 3. The WVPP strictly prohibits retaliation against anyone for reporting an incident of Workplace
81 Violence. Any individual found responsible for retaliating against an individual for such a report
82 may be subject to appropriate disciplinary action, up to and including termination, in the case of
83 Employees.
84 4. To prepare for a workplace violence emergency and enhance the likelihood that an individual will
85 report an incident, Cal Poly Partners will undertake the following actions:
- 86 a) Train Employees in Workplace Violence Prevention.
87 b) Post and distribute Workplace Violence prevention information.



- 88 c) Provide written email communication quarterly to the Cal Poly Partners employees about how
89 individuals can report a violent incident, threat, or other Workplace Violence concern without
90 fear of retaliation.

91 **362.4.5.2 Emergency Communication:**

- 92 1. In the event of a Workplace Violence emergency, Cal Poly will communicate and send emergency
93 notifications per the Cal Poly Emergency Operations Plan (EOP). A copy of the EOP can be found
94 [here](#).
95 a) Alerts will be sent to individuals who have signed up for Cal Poly's emergency notification
96 system through the PolyAlert system.
97 2. When information is available and appropriate, these alerts will:
98 a) Provide information about the presence, location, and nature of the Workplace Violence
99 emergency in specific terms.
100 b) Provide direction as to what actions the receiver of the message should take to ensure their
101 own safety.
102 c) Inform recipients about how to obtain assistance from the CPPD or other law enforcement
103 agencies.
104 d) State where or when additional information may be obtained.

105 **362.4.5.3 Restraining Order Process:** Cal Poly recognizes the importance of safety in the workplace and supports
106 the use of restraining orders to protect employees from threats or acts of violence. Cal Poly's process for
107 restraining orders is as follows:

- 108 1. Employees who become aware of violence or threats of violence should immediately report them
109 to the Cal Poly Police Department (CPPD), Human Resources, or a supervisor.
110 2. Supervisors and Human Resources personnel receiving reports of Workplace Violence or threats
111 will promptly inform CPPD. CPPD, in consultation with other leaders, will assess workplace
112 threats to determine if a restraining order is necessary and determine the course of action.

113 **362.4.5.4 Violent Incident Log:** The Cal Poly Police Department (CPPD) is primarily responsible for maintaining
114 the log, which will be used to record reported Workplace Violence incidents. The log will include information
115 based on the example shown in Appendix A.

116 **362.4.5.5 Post-Incident Response and Investigation:** After a Workplace Violence incident, a committee of Cal
117 Poly Partners leaders, under the purview of the HR Director will carry out the post-incident procedures. These
118 procedures include assessing the incident scene, interviewing all parties involved, obtaining reports from law
119 enforcement, examining the location for factors associated with the incident, reviewing security footage,
120 assessing all previous incidents, determining the cause of the incident, taking corrective action to prevent a
121 recurrence, recording findings, and documenting the incident in the violent incident log.

122 **362.4.6 Workplace Violence Prevention and Mitigation**

123 **362.4.6.1 The WVPP Management Team:** A committee of Cal Poly Partners leaders, under the purview of the
124 HR Director, provides collaborative oversight and support for the Cal Poly WVPP program. This joint group
125 performs assessments, reviews the frequency and severity of threatening or hostile situations, and develops
126 annual plans.

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128 **362.4.6.2 Training:**

- 129 1. Cal Poly Partners will provide training to employees as part of its Workplace Violence Prevention
130 Program (WVPP). This training occurs when the WVPP is initially established, or when a new
131 employee joins, and annually thereafter (see Appendix D for the training link).
132 2. All employees must complete mandatory Workplace Violence prevention training, as assigned by
133 Cal Poly Partners HR. This training ensures that everyone knows how to maintain a safe
134 environment and minimize potential risks.

135 **362.4.6.3 Workplace Violence Physical Hazard Identification and Evaluation**

- 136 1. The Office of Environmental Health & Safety (EHS), in coordination with CPPD and Joe Alves, Risk
137 Management (RM), will oversee the identification of Workplace Violence physical hazards.
138 2. Members will report workplace violence hazards or concerns through the following channels:
- 139 a) Report a hazardous or unsafe condition using the form given [here](#).
140 b) Use Cal Poly’s EHS Incident Reporting Form, available at this [link](#).
141 c) The Cal Poly Police Department, Human Resources, or a supervisor.
- 142 3. EHS administrators and staff will review and document the outcomes of all such reports.
143 4. EHS, CPPD, and John Thompson, Facilities Management conduct an annual review using a checklist
144 like the one provided by OSHA (see website link in Appendix C) for assessing workplace safety
145 measures.

146 **362.4.6.4 Workplace Violence Physical Hazard Correction:** John Thompson, Facilities Management and
147 Development will supervise the timely remediation of any workplace violence related to physical hazards that
148 are identified.

149 **362.4.6.5 Workplace Violence Procedural Update focused on Hazard Identification, Evaluation, and**
150 **Correction**

- 151 1. Cal Poly Partners HR, in partnership with CPPD, EHS, and Joe Alves, Risk Management, will oversee
152 the identification, evaluation, and correction of Workplace Violence procedural hazards.
153 Procedural hazards refer to potential risks or dangers that can occur due to the procedures
154 followed in a workplace or during a process.
155 2. Members can report workplace violence hazards or concerns through the following channels:
156 Report a hazardous or unsafe condition using the form given [here](#), alternatively, use Cal Poly’s EHS
157 Incident Reporting Form, available at this [link](#).
158 3. HR administrators and staff will review and document the outcomes of all such reports.
159 4. HR administrators and staff will also review and assess new or previously unrecognized hazards.

160 **362.4.7 Responsibilities:** The following administrative positions have the authority and responsibility for
161 implementing all or specific portions of the WVPP.

162 **362.4.7.1 Cal Poly Partners HR:** This office is responsible for the implementation and overall coordination of Cal
163 Poly’s WVPP. Other duties include:

- 164 1. HR Director: This role is responsible for assessing the effectiveness of the WVPP.
165 2. Cal Poly Partners HR have primary responsibility for ensuring the functionality of procedures
166 established to identify and receive reports related to procedural Workplace Violence hazards.



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3. Implementing procedures to prevent retaliation against individuals who have submitted reports.
 4. Developing, interpreting, and enforcing organizational policies related to Workplace Violence.
 5. Investigating reported acts or threats of violence, in partnership with CPPD, EHS, CRCO, and Joe Alves, Risk Management.
 6. Develop, interpret, and enforce organizational policies related to workplace violence. Responsible for recommending appropriate disciplinary action for employees, up to and including termination of employment, as it relates to Workplace Violence incidents or retaliation for reporting Workplace Violence incidents or concerns.
 7. Responsible for facilitating training programs, which may include the signs of potential violence, how to avoid violent situations, and what to do if they find themselves in a potentially violent situation.
 8. Play an important role by asking questions and being involved with the goal of early intervention and prevention of workplace incidents.
 9. Support risk assessment by identifying individuals or groups who may be more vulnerable to Workplace Violence, on account of protected status, identity, and/or lived experience.
 10. 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.
 11. Chairing the WVPP Working Group.

186 **362.4.7.2 The Cal Poly Police Department (CPPD):** Primary responsibility is to implement measures to ensure
187 Cal Poly is prepared to respond to, investigate, and potentially mitigate Workplace Violence incidents. Other
188 responsibilities include:

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1. Receiving and investigating all reports of acts or threats of violence, recording the results thereof, and taking corrective action.
 2. Issuing timely emergency notices, including instructions for how members of the Cal Poly community should respond to such emergencies, using the Emergency Operations Plan (EOP): <https://afd.calpoly.edu/emergency/docs/emergency-operations-plan.pdf>.

194 **362.4.7.3 Civil Rights and Compliance Office (CRCO):** CRCO is responsible for the university's compliance with
195 federal and state laws and regulations and CSU system policies and procedures related to discrimination,
196 harassment, sexual misconduct, sexual exploitation, dating violence, domestic violence, stalking, and retaliation.
197 CRCO provides an impartial and neutral avenue for employees, students, and other members of the university
198 community to address concerns regarding potential violations of CSU policies, and federal and state laws and
199 regulations. CRCO also serves as the Clery Director.

200 **362.4.7.4 The Office of Emergency Management (OEM):** OEM has primary responsibility for developing and
201 implementing procedures on how to respond to violent emergencies, including evacuation and/or sheltering
202 plans. Other duties include issuing emergency notifications related to Workplace Violence incidents.

203 **362.4.7.5 Joe Alves, Risk Management (RM):** RM has primary responsibility for ensuring that all training
204 associated with the WVPP meets all applicable federal, state, and CSU laws and regulations. Other
205 responsibilities include:

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1. Participate in Cal Poly efforts regarding post-incident response and review.
 2. Coordinating all necessary plan reviews, including annual reviews, reviews following a Workplace Violence incident, and reviews triggered by the identification of new hazards.



209 **362.4.7.6 Environmental Health and Safety (EHS):** The Director of Environmental Health & Safety has primary
210 responsibility for ensuring the functionality of procedures established to identify and receive reports related to
211 physical Workplace Violence hazards. Other duties include:

- 212 1. Maintaining records of Workplace Violence inspections.
- 213 2. Conducting required assessments, which include assessments of when the WVPP is initially
214 implemented, when a new hazard becomes known, and after an act of Workplace Violence.
- 215 3. Working with CPPD and RM, develop preventive measures to include a review of access control
216 systems, surveillance cameras, physical barriers, emergency communication systems, secure
217 entrances and exits, physical and environmental surroundings, and alarms and alerts.
- 218 4. Cal Poly Partners Human Resources has responsibility for maintaining Cal Poly Partners' OSHA 300
219 log.

220 **362.4.7.7 John Thompson, Facilities Management and Development:** The Manager of Facilities Management
221 is responsible for ensuring the implementation of corrective actions in response to confirmed workplace
222 violence hazards.

223 **362.4.7.8 Strategic Business Services (SBS):** Cal Poly, through its Office of SBS, will communicate the WVPP
224 requirements (SB553) to other employers on campus (including Auxiliary Organizations) to ensure that those
225 employers and their employees understand their respective roles as provided in SB553, which includes the
226 reporting and investigation of any potential Workplace Violence incident.

227 **362.4.7.9 Managers and Supervisors:** All Executive Leaders, managers and supervisors are responsible for
228 implementing and maintaining the WVPP in their administrative areas, ensuring that Employees have access to
229 Workplace Violence prevention training and written materials. Additional responsibilities include:

- 230 1. Informing Cal Poly Police Department of all threats or acts of violence.
- 231 2. Encouraging Employees to participate in campus Workplace Violence training seminars.
- 232 3. Discussing regularly with all personnel issues related to workplace security.
- 233 4. Training and/or counseling Employees whose performance is deficient in complying with work
234 practices designed to increase workplace security.
- 235 5. Bringing forward input from the Cal Poly community for the improvement of WVPP.

236 **362.4.7.10 Members of the Cal Poly Partners Community:** All members of the Cal Poly Partners community are
237 responsible for using safe work practices, following all Cal Poly Partners directives, policies, and procedures
238 concerning campus security, and assisting in maintaining a safe and secure work and learning environment. All
239 are strongly encouraged to review and become familiar with materials concerning campus security and
240 participate in campus Workplace Violence prevention training. To encourage Employees to comply with work
241 practices designed to make the workplace more secure and to not engage in threats or physical actions that
242 create a workplace violence hazard for others on campus, Cal Poly Partners will:

- 243 1. Communicate and provide training concerning the WVPP to employees.
- 244 2. Recognize members of the community who perform practices that promote safety and/or mitigate
245 the risks of Workplace Violence.
- 246 3. Provide training and/or counseling to members of the community whose performance is deficient
247 in complying with work practices designed to enhance workplace security.

248 **362.4.8 General Provisions:**



249 **362.4.8.1 Employee Involvement:** Cal Poly Partners will take the following measures to obtain the active
250 involvement of employees, and authorized employee representatives in improving and implementing the
251 WVPP:

- 252 1. Ensure Employees and authorized employee representatives have opportunities to provide input
253 by a) identifying, evaluating, and determining corrective measures to prevent Workplace Violence;
254 b) bringing forward improvements to training; and c) reporting Workplace Violence incidents.
255 2. Communicate all policies and procedures within the WVPP to all employees.
256 3. Require all Employees to follow the WVPP and assist in maintaining a safe work and learning
257 environment.
258 4. Ensure the WVPP addresses the hazards and corrective measures for all work areas, operations,
259 and learning environments.

260 **362.4.8.2 Access to the Written WVPP:** The WVPP will be in writing, available and easily accessible to the Cal
261 Poly Partners community, authorized employee representatives, and representatives of Cal/OSHA, and available
262 on Cal Poly Partner's [Intranet](#).

263 **362.4.8.3 Recordkeeping:** WVPP records will be maintained consistently with other occupational safety, law
264 enforcement, and document retention requirements of state and federal law.

- 265 1. EHS will create and maintain records of Workplace Violence hazard identification and evaluation
266 for a minimum of three (3) years.
267 2. Cal Poly Partners HR will create and maintain training records for a minimum of three (3) years.
268 3. John Thompson, Cal Poly Partners Facilities, will create and maintain records of Workplace
269 Violence hazard correction for a minimum of five (5) years.
270 4. CPPD will maintain violent incident logs and Workplace Violence incident investigations for a
271 minimum of five (5) years. These records shall not contain medical information per subdivision (j)
272 of Section 56.05 of the Civil Code.
273 5. Cal Poly Partners will make all records of WVPP, as required by Section 6401.9(f), available to
274 Cal/OSHA upon request for examination and copying.
275 6. Cal Poly Partners will make the records available to Employees and employee representatives upon
276 request and without cost for examination and copying within fifteen calendar days of a request.
277 These records include Workplace Violence hazard identification, evaluation, correction, training
278 records, and violent incident logs.

279 **362.4.8.4 WVPP Review:** A committee of Cal Poly Partners leaders under the purview of the HR Director
280 provides collaborative oversight and support to the Cal Poly WVPP program and will ensure that the WVPP is
281 reviewed for effectiveness at least annually, or when a deficiency is observed or becomes apparent.

282 **362.4.9 Accountability:** Any Employee, or volunteer who engages in an act or threat of violence or who retaliates
283 against another individual for reporting a Workplace Violence incident or concern is subject to disciplinary action
284 under California law and regulations, CSU/Cal Poly/Cal Poly Partners policies, up to and including termination for
285 Employees. If a contractor, vendor, or visitor engages in an act or threat of violence or retaliates against another
286 individual for reporting a Workplace Violence incident or concern, they may be barred from Cal Poly-owned or leased
287 property and have their business relationship with Cal Poly and Cal Poly Partners suspended or terminated.

288 **Appendix A: Example of Violent Incident Log from CA.Gov:** [Workplace Violent Incident Log \(ca.gov\)](#)

289 **Appendix B: Cal Poly Emergency Operations Plan:**



emergency-operation
s-plan.pdf

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291 **Appendix C: Example of the Workplace Violence Prevention Checklist from OSHA:** [Preventing Violence in the](https://www.osha.gov/preventing-violence-in-the-workplace)
292 [Workplace \(osha.gov\)](https://www.osha.gov/preventing-violence-in-the-workplace)

293 **Appendix D: Appendix D: Draft of the WVPP Training that is being developed by CO:**