



**Santa Clara
University**

Workplace Violence Prevention Plan

**Santa Clara University
500 El Camino Real
Santa Clara, CA 95053**

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Purpose

Santa Clara University (SCU) has developed this Workplace Violence Prevention Plan (WVPP) in compliance with California Labor Code Sections 6401.7 and 6401.9. The purpose of this plan is to further the University's efforts to identify, evaluate, and determine corrective measures to prevent incidents of workplace violence.

This WVPP will be reviewed at least annually, when a deficiency is observed or becomes apparent, and after a workplace violence incident.

Applicability

The Workplace Violence Prevention Plan as described in this document is applicable to all Santa Clara University employees (staff, faculty and student employees).

Definitions

Emergency: Unanticipated circumstances that can be life threatening or pose a risk of significant injuries to employees or other persons.

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.

Log: The violent incident log required by LC section 6401.9.

Plan: The workplace violence prevention plan required by LC section 6401.9.

Serious injury or illness: Any injury or illness occurring in a place of employment or in connection with any employment that requires inpatient hospitalization for other than medical observation or diagnostic testing, or in which an employee suffers an amputation, the loss of an eye, or any serious degree of permanent disfigurement, but does not include any injury or illness or death caused by an accident on a public street or highway, unless the accident occurred in a construction zone.

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.

Workplace violence: Any act of violence or threat of violence that occurs in a place of employment.

Workplace violence includes, but is not limited to, the following:

- The threat or use of physical force against an employee that results in, or has a high likelihood of resulting in, injury, psychological trauma, or stress, regardless of whether the employee sustains an injury.
- An incident involving a threat or use of a firearm or other dangerous weapon, including the use of common objects as weapons, regardless of whether the employee sustains an injury.

The following four workplace violence types:

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 or approaches employees with the intent to commit a crime.

Type 2 violence - Workplace violence directed at employees by customers, clients, patients, students, inmates, or visitors.

Type 3 violence - Workplace violence against an employee by a present or former employee, supervisor, or manager.

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.

Workplace violence does not include lawful acts of self-defense or defense of others.

Work practice controls: Procedures and rules which are used to effectively reduce workplace violence hazards.

Responsibility

The Emergency Planning Manager is the WVPP administrator and has the authority and responsibility for implementing the provisions of this plan for Santa Clara University. The Emergency Planning Manager can be contacted at: 408-551-3636 or tmasamori@scu.edu.

Others responsible for the implementation of the provisions of this plan include:

Job Title/Position	WVPP Responsibility(ies)	Phone #	Email
Director, Campus Safety Services	Responsible for plan overview, assisting with employee involvement and training	408-554-4161	pjbeltran@scu.edu
Assistant Director, Campus Safety Services	Responsible for coordinating emergency response, hazard identification follow-up, and coordination with other departments	408-554-5082	jmalae@scu.edu

All managers and supervisors are responsible for implementing and maintaining the WVPP in their work areas and for answering employee questions about the WVPP.

Employee Active Involvement

Santa Clara University ensures the following policies and procedures to obtain the active involvement of employees and authorized employee representatives in developing and implementing the plan:

- Management will work with and allow employees and authorized employee representatives to participate in:
 - Identifying, evaluating, and determining corrective measures to prevent workplace violence.
 - Designing and implementing training.
 - Reporting and investigating workplace violence incidents.

- Management will ensure that all workplace violence policies and procedures within this written plan are clearly communicated and understood by all employees. Managers and supervisors will enforce the rules fairly and uniformly.
- All employees will follow all workplace violence prevention plan directives, policies, and procedures, and assist in maintaining a safe work environment.
- The plan shall be in effect at all times and in all work areas and be specific to the hazards and corrective measures for each work area and operation.

Employee Compliance

The University's system to ensure that employees comply with the rules and work practices that are designed to make the workplace more secure, and do not engage in threats or physical actions which create a security hazard for others in the workplace, include at a minimum:

- Training employees, supervisors, and managers in the provisions of Santa Clara University's Workplace Violence Prevention Plan (WVPP).
- Effective procedures to ensure that supervisory and nonsupervisory employees comply with the WVPP. Examples include the completion of training and education and taking appropriate corrective action to respond when an employee fails to comply.
- Provide retraining to employees whose safety performance is deficient with the WVPP.
- Discipline employees for failure to comply with the WVPP.

Communication with Employees

We recognize that open, two-way communication between our management team, staff, and other employers about workplace violence issues is essential to a safe and productive workplace. The following communication system is designed to facilitate a continuous flow of workplace violence prevention information between management and staff in a form that is readily understandable by all employees, and consists of one or more of the following:

- New employee orientation includes workplace violence prevention policies and procedures.
- Workplace violence prevention training programs.
- Regularly scheduled meetings that address security issues and potential workplace violence hazards.
- Effective communication between employees and supervisors about workplace violence prevention and violence concerns.
- Posted or distributed workplace violence prevention information.
- How employees can report a violent incident, threat, or other workplace violence concern to employer or law enforcement without fear of reprisal or adverse action.
 - Employees can anonymously report a violent incident, threat, or other violence concerns through EthicsPoint.
 - Employees can also report a violent incident, threat, or other violence concerns to Campus Safety Services, the Department of Human Resources, the Office of the Executive Vice President and Provost, or the Office of Equal Opportunity and Title IX.
 - In the event of an emergency, dial or text 911 if it is safe to do so, then call Campus Safety Services Emergency at 408-554-4444.
- Employees will not be prevented from accessing their mobile or other communication devices to seek emergency assistance, assess the safety of a situation, or communicate with a person to verify their safety. Employees' concerns will be investigated in a timely manner and they will be informed of the results of the investigation and any corrective actions to be taken.

- Other methods of effective communication depend on circumstances, and may include the following:
 - Updates during daily/weekly/monthly/quarterly meetings with other employers in the building (at or near and around the same worksite) to discuss the plan and any updates.
 - Sharing training materials and incident reports with other employers to ensure a coordinated response to any incidents.
 - Communications, as appropriate, regarding incidents.

Coordination with Other Employers (Contract Staff)

Santa Clara University will implement the following effective procedures to coordinate implementation of its plan with other employers to ensure that those employers and employees understand their respective roles, as provided in the plan.

- All employees will be trained on workplace violence prevention.
- Workplace violence incidents involving any employee are reported, investigated, and recorded.
- Santa Clara University will ensure that if its contract employees experience workplace violence incidents that Santa Clara University will record the information in a violent incident log and shall also provide a copy of that log to the appropriate contacts for contract staff.

Workplace Violence Incident Reporting Procedure

Santa Clara University will implement the following effective procedures to ensure that:

All threats or acts of workplace violence are reported to an employee's supervisor or manager, who will inform the WVPP administrator. This will be accomplished by contacting [Campus Safety Services](#) in-person or by phone at 408-554-4444. If that's not possible, employees will report incidents directly to the WVPP administrator.

Additional options for reporting incidents, threats, hazards, and concerns of workplace violence:

- The Department of Human Resources
- Office of the Executive Vice President and Provost
- [The Office of Equal Opportunity and Title IX](#)
- [EthicsPoint](#)
- Workplace Violence Reporting Form

The University prohibits retaliation against any individual who reports threats or acts of workplace violence. The University will investigate reports of retaliation and take appropriate corrective action based on the results of the investigation. Engaging in retaliation may result in disciplinary action, up to and including termination from employment. For more information, see the University's Whistleblower Protection Policy.

Emergency Response Procedures

Santa Clara University has in place the following specific measures to handle actual or potential workplace violence emergencies:

- [SCU Bronco Alert](#) is the University's mass communication platform to alert employees of the presence, location, and nature of workplace violence emergencies.
- The following are modes of communication through SCU Bronco Alert:
 - SMS Text Message
 - Voice Calls
 - Email
 - [Guardian App](#)
 - [Emergency Blue Phones](#) equipped with "Giant Voice"

- For each campus building, and during special events, designated [Emergency Assembly Points](#) are established.
- During an environmental emergency, SCU Bronco Alert will be utilized to issue a [Shelter-in-Place](#).
- During an active threat, SCU Bronco Alert will be utilized to issue a [Lockdown](#).

Emergency Planning: Develops, implements, and continuously improves a comprehensive campus emergency management program. This includes developing, maintaining, and facilitating implementation of the University's emergency operations plan; developing and conducting exercises to test plans and procedures. Emergency Planning manages the SCU Bronco Alert mass communication system. The program is based on fire and occupational health and safety regulations and standards, California Standardized Emergency Management System (SEMS), National Incident Management System (NIMS), the Clery Act, and accepted emergency planning and management professional practices, operating under the umbrella of the campus Emergency Operations Plan (EOP).

Evacuation: In the event of an immediate, life-threatening emergency during which a campus building(s) must be evacuated, Campus Safety Services will coordinate safe travel to the designated Emergency Assembly Point. SCU Bronco Alert will be used to provide information about this type of evacuation.

Lockdown (immediate threat to your location):

A lockdown request is triggered during situations such as the presence of an active threat inside a building, a dangerous incident at, or near, your location or immediate neighborhood.

A lockdown requires locking doors, windows, and barricading oneself (and others), blocking entry to a campus building, a classroom, or to an office or office suite. Additionally, a lockdown requires:

- Lock or barricade class and office doors.
- Close any windows and window shades.
- Turn off all lights.
- Instruct everyone to remain silent and not to go into hallways.
- Crouch down in areas that are out of sight from doors and windows to conceal yourself as much as possible.
- If you are in hallways during the emergency, seek shelter immediately in the nearest classroom or office suite.
- If you are in outdoor areas, you should immediately take cover.

- Monitor SCU Bronco Alert for additional incident information, and for further instructions, or an “all clear” signal from the Police Department or Campus Safety Services.

Shelter-in-Place (no immediate threat to your location):

You may be advised to "shelter in place" rather than evacuate your building during emergency situations such as a dangerous incident near your building, or in the surrounding neighborhood. Other triggers include a large hazardous material release, or severe weather emergency. The request to shelter-in-place will be conveyed through SCU Bronco Alert or the Police Department. In the event of a shelter-in-place, please follow these guidelines:

- Stay inside the building or go indoors as quickly as possible if you are working outside.
- Close windows to provide tighter seal against chemicals vapors, smoke and/or fumes.
- Locate supplies you may need such as food, water, radio, or flashlights, if you have them.
- In the event of a hazardous material release, turn off fans, air conditioning or ventilation systems (if you have control of these systems).
- Monitor SCU Bronco Alert for additional incident information and for further instructions.

Campus Safety Staff: Campus Safety Services (CSS) collaborates across divisions and departments to support a diverse and inclusive University community in a manner that fosters safety and belonging, and that encourages student learning and success. CSS operates 24/7/365, serving the community of students, faculty, staff, alumni and University guests. CSS staff are collaborative partners in implementing the Jesuit commitment to cura personalis with all members of our community, particularly with regard to the holistic formation of our students.

Non-emergency situations (i.e. verbal abuse, perceived intimidation, harassment, etc.)

Santa Clara Police Front Desk	408-615-4700
Counseling Center	408-554-4172
Cowell Student Health Center	408-554-4501
Kaiser Hospital - Santa Clara	408-236-4400
O'Connor Hospital - San Jose	408-947-2666
Rape Crisis Center	408-287-3000
San Jose Medical	408-977-4444
Santa Clara Valley Medical Center	408-885-6950
Suicide Hotline (Santa Clara County)	408-279-3312

In the event of imminent threats, violent incidents, or dangerous or emergency situations, contact the following:

Responsible Department	Phone #	Email
Fire, Police, EMS	Call or text 911	N/A
Campus Safety Services	408-554-4444	campussafety@scu.edu

Workplace Violence Hazard Identification and Evaluation

The following policies and procedures are established and required to be conducted by Santa Clara University to ensure that workplace violence hazards are identified and evaluated:

- Inspections shall be conducted when the plan is first established, after each workplace violence incident, and whenever the employer is made aware of a new or previously unrecognized hazard.
- Review all submitted/reported concerns of potential hazards:
 - Submitted as reports to Campus Safety’s ARMS Case Management module
 - Direct Emails
 - Direct Phone Calls
 - EthicsPoint Reports
 - Workplace Violence Reporting Form

Periodic Inspections

Periodic inspections of workplace violence hazards will identify unsafe conditions and work practices. This may require assessment for more than one type of workplace violence. Periodic inspections shall be conducted monthly.

Periodic inspections of workplace violence hazards will be conducted by Campus Safety Services staff to identify unsafe conditions and work practices. This may require assessment for more than one type of workplace violence.

Inspections for workplace violence hazards include assessing:

- The use of the [SITE ASSESS](#) app. This app examines building and ground safety, security, accessibility, and emergency preparedness.
- The exterior and interior of the campus buildings for its attractiveness to potential criminals.
- The need for increased violence surveillance measures, such as additional security cameras.
- Procedures for employee response during criminal acts, including prohibiting employees, who are not Campus Safety Staff, from confronting violent persons or persons committing a criminal act.
- Procedures for reporting suspicious persons or activities.
- Effective location and functioning of panic and lockdown initiating buttons.
- Posting of emergency procedure posters across campus.
- Whether employees have access to a telephone with an outside line.
- Whether employees have knowledge of effective escape routes from the workplace via evacuation route maps.
- Whether employees have a designated safe area where they can go in an emergency.
- Adequacy of workplace security systems, such as door locks, entry codes or access card readers, security windows, physical barriers, and restraint systems.
- Frequency and severity of threatening or hostile situations that may lead to violent acts by persons who are service recipients of our establishment.
- Campus Safety Services' skill in safely handling threatening or hostile service recipients.
- Effectiveness of systems and procedures that warn others of actual or potential workplace violence danger or that summon assistance, e.g. alarms or panic buttons.
- How well the University's management and employees communicate with each other.

- 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.
- Frequency and severity of employees' reports of threats of physical or verbal abuse by managers, supervisors, or other employees.
- Any prior violent acts, threats of physical violence, verbal abuse, property damage, or other signs of strain or pressure in the workplace.

Workplace Violence Hazard Correction

Workplace violence hazards will be evaluated and corrected in a timely manner. Santa Clara University will implement the following effective procedures to correct workplace violence hazards that are identified:

- If an imminent workplace violence hazard exists that cannot be immediately abated without endangering employee(s), all exposed employee(s) will be removed from the situation except those necessary to correct the existing condition. Employees necessary to correct the hazardous condition will be provided with the necessary protection. This applies to all student workers, staff, faculty, and contractors.
- All corrective actions taken will be documented and dated on the appropriate forms through ARMS Case Management.
- Corrective measures for workplace violence hazards will be specific to a given work area.

Procedures for Post-Incident Response and Investigation

After a workplace incident, the WVPP administrator or their designee will implement the following post-incident procedures:

- Visit the scene of an incident as soon as safe and practicable.
- Interviews involved parties, such as employees, witnesses, law enforcement, and/or security personnel.
- Review security footage of existing security cameras if applicable.

- Examine the workplace for security risk factors associated with the incident, including any previous reports of inappropriate behavior by the perpetrator.
- Determine the cause of the incident.
- Take corrective action to prevent similar incidents from occurring.
- Record the findings and ensure corrective actions are taken.
- Obtain any reports completed by law enforcement.
- The violent incident log will be used for every workplace violence incident and will include information, such as:
 - The date, time, and location of the incident.
 - The workplace violence type or types involved in the incident.
 - A detailed description of the incident.
 - 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 other perpetrator.
 - 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.
 - A classification of where the incident occurred, such as in the workplace, parking lot or other area outside the workplace, or other area.
 - The type of incident including, but not limited to, whether it involved any of the following:

- Physical attack without a weapon including, but not limited to, biting, choking, grabbing, hair pulling, kicking, punching, slapping, pushing, pulling, scratching, or spitting.
 - Attack with a weapon or object including, but not limited to, a firearm, knife, or other object.
 - Threat of physical force or threat of the use of a weapon or other object.
 - Sexual assault or threat including, but not limited to, rape, attempted rape, physical display, or unwanted verbal or physical sexual contact.
 - Animal attack.
 - Other.
- Consequences of the incident including, but not limited to:
 - Whether security or law enforcement was contacted and their response.
 - Actions taken to protect employees from a continuing threat or from any other hazards identified as a result of the incident.
 - Information about the person completing the log including their name, job title, and the date completed.
- Reviewing all previous incidents.

Ensure that no personal identifying information is recorded or documented in the written investigation report. This includes information which would reveal identification of any person involved in a violent incident, such as the person's name, address, electronic mail address, telephone number, social security number, or other information that, alone or in combination with other publicly available information, reveals the person's identity.

Training and Instruction

All employees, including managers and supervisors, will have training and instruction on general and job-specific workplace violence practices. These sessions could involve presentations, discussions, and practical exercises. Training and instruction will be provided as follows:

- When the WVPP is first established.
- Annually to ensure all employees understand and comply with the plan.
- 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.

Santa Clara University will provide its employees with training and instruction on the definitions found on page 1 of this plan and the requirements listed below:

- The employer's WVPP, how to obtain a copy of the employer's plan at no cost, and how to participate in development and implementation of the employer's plan.
- How to report workplace violence incidents or concerns to the employer or law enforcement without fear of reprisal.
- Workplace violence hazards specific to the employees' jobs, the corrective measures Santa Clara University has implemented, how to seek assistance to prevent or respond to violence, and strategies to avoid physical harm.
- The violent incident log and how to obtain copies of records pertaining to hazard identification, evaluation and correction, training records, and violent incident logs.
- Opportunities Santa Clara University has for interactive questions and answers with a person(s) knowledgeable about the Santa Clara University WVPP.
- Strategies to avoid/prevent workplace violence and physical harm, such as:
 - How to recognize workplace violence hazards, including the risk factors associated with the four types of workplace violence.
 - Ways to defuse hostile or threatening situations.

- How to recognize alerts, alarms, or other warnings about emergency conditions and how to use identified escape routes or locations for sheltering.
- Employee routes of escape.
- Emergency medical care provided in the event of any violent act upon an employee.
- Post-event trauma counseling for employees desiring such assistance.

Employee Access to the Written WVPP and Records

Santa Clara University ensures that the WVPP plan shall be in writing and shall be available and easily accessible to employees, authorized employee representatives, and representatives of Cal/OSHA at all times.

This will be accomplished by providing an employee or designated representative a printed copy of the written WVPP, unless the employee or designated representative agrees to receive an electronic copy.

The following records shall be made available to employees and their representatives, upon request and without cost, for examination and copying within 15 calendar days of a request:

- Records of workplace violence hazard identification, evaluation, and correction.
- Training records.
- Violent incident logs.

Recordkeeping

Santa Clara University will:

- Create and maintain records of workplace violence hazard identification, evaluation, and correction, for a minimum of five (5) years.
- Create and maintain training records for a minimum of one (1) year and include the following:
 - Training dates.
 - Contents or a summary of the training sessions.
 - Names and qualifications of persons conducting the training.
 - Names and job titles of all persons attending the training sessions.
- Maintain violent incident logs for a minimum of five (5) years.
 - Note: The records shall not contain medical information per subdivision (j) of section 56.05 of the Civil Code.
- Maintain records of workplace violence incident investigations for a minimum of five (5) years.
 - Note: The records shall not contain medical information per subdivision (j) of section 56.05 of the Civil Code.
- All records of workplace violence hazard identification, evaluation, and correction; training, incident logs and workplace violence incident investigations required by [LC section 6401.9\(f\)](#), shall be made available to Cal/OSHA upon request for examination and copying.

Review and Revision of the WVPP

The Santa Clara University WVPP will be reviewed for effectiveness

- At least annually;
- When a deficiency is observed or becomes apparent;
- After a workplace violence incident; and
- As needed.

Review and revision of the WVPP will include the procedures listed in the EMPLOYEE ACTIVE INVOLVEMENT section of this WVPP, as well as the following procedures to obtain the active involvement of employees and authorized employee representatives in reviewing the plan's effectiveness:

- Review of Santa Clara University's WVPP should include, but is not limited to:
 - Review of incident investigations and the violent incident log.
 - Assessment of the effectiveness of security systems, including alarms, emergency response, and security personnel availability (if applicable).
- Review that violence risks are being properly identified, evaluated, and corrected. Any necessary revisions are made promptly and communicated to all employees.

Employer Reporting Responsibilities

As required by [California Code of Regulations \(CCR\), Title 8, Section 342\(a\), Reporting Work-Connected Fatalities and Serious Injuries](#), Santa Clara University will immediately report to Cal/OSHA any serious injury or illness (as defined by [CCR, Title 8, Section 330\(h\)](#)), or death (including any due to Workplace Violence) of an employee occurring in a place of employment or in connection with any employment.