



**SONOMA
STATE
UNIVERSITY**

Workplace Violence Prevention Plan

Sonoma State University

Workplace Violence Prevention Plan

Version 1.0 - **Interim Plan**

Prepared by: Risk Management & Safety Services

California Labor Code section 6401.9 Compliant

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Table of Contents

- Section I | Introduction and Background..... 1**
 - Purpose..... 1
 - Definitions..... 1
 - Scope and Applicability..... 3
 - Employee Compliance..... 4
 - Responsibilities..... 4
 - Plan Implementation..... 6
- Section II | Employee Involvement..... 8**
 - Campuswide Safety Committee..... 8
- Section III | Preventing Workplace Violence..... 10**
 - Identifying Workplace Violence Hazards..... 10
 - Correcting Workplace Violence Hazards..... 12
 - Recognizing Concerning Behavior in Employees..... 13
- Section V | Responding to Workplace Violence..... 16**
 - How to Report Incidents or Threats of Workplace Violence..... 16
 - Accepting/Referring Reports..... 17
 - Emergency Response..... 19
 - Initial Non-emergency Response..... 20
 - Reporting Incidents of Workplace Violence to Employees..... 21
 - Administrative Investigation Response..... 22
 - Post-Incident Response..... 23
- Section VI | Training..... 25**
 - Program Training and Education..... 25
 - Plan Partners Training..... 26
- Section VII | Workplace Violence Records..... 27**
 - Violent Incident Log..... 27
 - Access to WVPP Records..... 28
- Section VIII | Records Maintenance..... 29**
- Section IX | Plan Maintenance..... 30**

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Section I

Introduction and Background

Sonoma State University aims to provide a working environment that minimizes the potential for workplace violence and other safety and security risks. Violence in the workplace poses a significant threat to the safety and wellbeing of our employees and the general public. It is the responsibility of all employees to help minimize workplace violence. This program establishes procedures to minimize the threat of violence in the workplace and provides guidelines for responding promptly and effectively to workplace violence.

This plan is intended to provide the provisions for compliance with California Labor Code section 6401.9 and supports University Policy 1998-5, "[Violence-free Campus](#)," which states that "Sonoma State University is committed to creating and maintaining a campus environment for all members of the university community that is free from violence."

Purpose

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.
- 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.
- Communicate post-incident response and investigation processes.

Definitions

Correction is the elimination or control of a workplace hazard (per The Occupational Safety and Health Administration (OSHA)). For the purpose of this plan, **controls** are actions and

mechanisms that reduce the incidence or severity of a hazard or threat. The identification of corrections and controls will be guided by the [OSHA Hazard Prevention and Control](#) guidance.

Employee refers to any employee or volunteer of Sonoma State University, including student employees.

Department Official in Charge is the manager in SSUPD, HR/FAS, OPHD, or Student Affairs/Student Conduct who is assigned responsibility for the primary investigation of the workplace violence incident.

Impacted employees are those employees who are directly impacted by an incident of workplace violence. Impact may be experienced through proximity at the time of the incident, proximity or similarity of the workplace, similarity of workplace conditions, or shared physical, emotional, or psychological impacts of the incident.

Plan partners are those employees who are responsible for the development, implementation, and execution of this plan. These are generally employees from the Sonoma State University Police Department, Human Resources, Faculty Affairs and Success, Risk Management, Environmental Health & Safety, and Office for the Prevention of Harassment and Discrimination.

Threat of violence means 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 means any act of violence or threat of violence that occurs in a place of employment. Acts of violence include, but are 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.
- does not include lawful acts of self-defense or defense of others.

There are four common types of workplace violence (any incident may include overlaps of multiple types of violence as defined below):

- **Type 1 Violence:** Workplace violence committed by a person who has no legitimate business at the worksite, including violent acts by anyone who enters the workplace or approaches workers 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.

Scope and Applicability

This plan applies to all employees and volunteers of Sonoma State University. Additionally, the plan applies to all members of the University community including students, contractors, vendors, guests, and visitors when engaged in University academic, business, or co-curricular programs and activities, whether on or off-campus (unless exempted below). University auxiliary organizations and contractors are responsible for applying similar practices to their respective programs and activities and complying with the university program when applicable.

Employees who are assigned to telework locations of the employee's choosing that are not under the control of the university are not subject to this plan when working at such locations. Note that the lack of applicability of this plan under specific circumstances applies only to the plan, not the [Violence-free Campus policy](#) of Sonoma State University.

The plan shall be in effect at all times and in all work areas owned and controlled by Sonoma State University and be specific to the hazards and corrective measures for each work area and operation. These work areas include, but are not limited to, the university preserves, leased offices, and leased/rented classrooms or offices where university employees may be assigned to work.

Workplace Violence at Non-campus Workplace Assignments

The university is committed to providing a safe, violence-free workplace to all employees, whether they are performing work on campus or at an alternative location on behalf of the university. It is not uncommon for employees to be regularly assigned to perform work at a location other than campus or other properties owned or controlled by the university. This may include primary or secondary school sites or hospital or health care sites.

Any site contracted with the university to have university employees working on their sites are required to have workplace violence prevention plans that are compliant with California Labor Code §6401. Conversely, all university employees will agree to comply with applicable site plans and will report any incidents of workplace violence for inclusion in the appropriate site workplace violence log.

Employee Compliance

All Sonoma State University employees, including managers and supervisors, are expected to adhere to this plan and are responsible for ensuring they have read this plan and act in compliance with it.

To ensure that employees comply with the rules and safe work practices included in this plan, the university, will take the following steps, at a minimum:

- Inform employees of the provisions of this plan.
- Educate employees about what does (and doesn't) constitute workplace violence, as well as the workplace hazards that are relevant to their specific role.
- Establish accessible channels for employees to report workplace hazards and violence, including anonymously.
- Provide training to all employees when the plan is created, and as new hazards are identified.
- Conduct post-incident investigations and implement corrective measures.
- Discipline employees that fail to comply with the WVPP.

Responsibilities

The Associate Vice President for Risk Management & Safety Services serves as the Program Administrator and has the authority and responsibility for implementing and maintaining the provisions of this WVPP program for Sonoma State University. The Program Administrator will participate in all post-incident reviews and ensure campus leadership is aware of incidents of workplace violence, as appropriate.

Program Administrator (as of July 1, 2024):

Tyson Hill
Associate Vice President
Risk Management & Safety Services
(707) 664-3823
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To support the campuswide implementation and maintenance of the WVPP, the following departments will support the program administrator in the following areas:

Environmental Health & Safety is responsible for maintaining the Violent Incident Log, collecting logs from outside employers for incidents occurring on campus or involving campus employees, monitoring regulations for updates, receiving and forwarding reports of workplace violence incidents or threats, and conducting post-incident reviews. EH&S will coordinate WVPP training by ensuring CSU Learn modules are assigned by HR and completed by employees, supporting

the development of content for new employee orientation to be delivered by Risk Management, coordinating department or audience specific training, and developing web content.

Risk Management is responsible for participating in post-incident reviews of workplace violence and supporting other university departments in identifying employees exhibiting concerning behaviors. Risk Management will host the WVPP website and ensure site contents are up to date and accessible to the campus community. Risk Management will deliver new employee orientation training.

The Sonoma State University Police Department is responsible for the protection of public safety, enforcement of laws on campus, criminal investigation of incidents or threats of workplace violence, and the enforcement of protective orders that may affect university employees. The police department will work closely with campus departments to identify students and employees who may be exhibiting concerning behaviors.

Human Resources/Faculty Affairs and Success is responsible for personnel investigations of incidents or threats of workplace violence involving employees, enforcing collective bargaining agreements, supporting employees needing leaves and other assistance, supporting managers working with challenging personnel situations, and assigning WVPP training to all employees through CSU Learn. HR/FAS will participate in all WVPP planning, response, and maintenance activities. Human Resources participates when matters involve non-faculty employees and/or volunteers. Faculty Affairs and Success participates when matters involve faculty employees and/or volunteers. Both units will participate if a matter involves members from both groups.

Office for the Prevention of Harassment and Discrimination (OPHD) is responsible for the administrative investigation of incidents and threats of workplace violence involving incidents that are motivated or believed to be motivated by discrimination or otherwise involve sexual misconduct. OPHD will also support EH&S in the development of training addressing discrimination-specific recognition and prevention of workplace violence.

Student Affairs/Student Conduct is responsible for administrative investigation of incidents or threats of workplace violence against employees involving students and supporting other university departments in identifying students exhibiting concerning behaviors. *(Note: If an act of workplace violence is committed by a student actively serving in a role as a student employee, that individual is considered an employee for the purpose of this plan, and is investigated by Human Resources.)*

In addition to these departmental responsibilities, the following general responsibilities are shared across the university:

Management employees are responsible for ensuring that all employees within their department are trained and understand the expectations for supporting a violence-free workplace, how to report incidents or threats of violence, how to report concerns over potential or escalating conflict in the workplace, how to identify and report hazards in the workplace, and how to conduct these activities themselves.

All employees are responsible for supporting a violence free workplace by seeking resolution to conflict without the use of violence, physical force, or threat. Employees will ensure they are familiar with the provisions of this plan, how to report incidents or threats of violence, how to report concerns over potential or escalating conflict in the workplace, how to identify and how to report hazards in the workplace.

Students are responsible for supporting a safe workplace for university faculty and staff by being good citizens and engaging in responsible behaviors that reflect well upon the university. Students are expected to be civil to those in the campus community, and contribute positively to university life. Students should seek resolution to any conflict with employees or other issues without the use of violence, physical force, or threat. Student behavior that is not consistent with the Student Conduct Code will be addressed through an educational process designed to promote safety and good citizenship and, when necessary, impose appropriate consequences. Students will further support a safe workplace for employees by reporting concerns about student and employee conduct or behavior to a university official.

Additional Responsibilities and Reporting Requirements

Many university employees are subject to specific responsibilities and reporting requirements related to the Nondiscrimination Policy (responsible employees), Clery Act (campus security authorities), Donahoe Act (campus safety authorities), mandatory reporters of child abuse, reporting requirements for medical providers, and student conduct violations. Nothing in this plan relinquishes or alters the responsibilities of those employees if they become aware of a workplace violence reportable incident. Reports made pursuant to this plan must also be accompanied by any mandated reports required by their special status or reporting requirement.

Plan Implementation

Sonoma State University is committed to the development of a workplace violence prevention and response program that includes the engagement and support of university employees and their representatives. To ensure both compliance with SB533 and appropriate opportunities for the participation of all university employees, including those not traditionally working during the implementation date of July 1, 2024 of this plan, the university will approach the implementation of this plan in two phases.

- Phase I: The interim plan will be implemented by July 1, 2024 and will be in effect until the final plan is approved. The final plan will be developed with the engagement of all employee groups who choose to participate during the Fall 2024 semester in the manner detailed below.
- Phase II: The final plan is expected to be adopted by January 1, 2025 or sooner following the engagement of all employee groups during the Fall 2024 semester.

- Phase III: The final phase of the plan will incorporate additional requirements of SB533 that commence on January 1, 2025 that authorize a collective bargaining representative of an employee to seek a temporary restraining order and an order after hearing on behalf of the employee and other employees at the workplace upon demonstration of credible threat of violence.

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Section II

Employee Involvement

During development of the final plan, the university will work directly with employees and their authorized representatives in each of the following components of the WVPP. The university will identify multiple avenues of employee engagement to ensure the opportunity to engage is afforded to those who wish to participate.

Campuswide Safety Committee

The Campuswide Safety Committee is charged with the consultative responsibilities of the program. However, for the first 12 months, to ensure the breadth of consultation and program development is accomplished, the committee will support a Subcommittee on Workplace Violence Prevention. The subcommittee will report its activities to the campuswide safety committee. The subcommittee will be charged with ensuring employees from all represented and unrepresented areas have the opportunity to participate. Representatives of represented employees will also be invited and encouraged to participate as well.

During the development phase of the planning process, the subcommittee will work directly with employees in the development of the following plan elements:

- Identifying and implementing the most effective means to engage employees in the planning process
- Identifying, evaluating, and mitigating workplace violence hazards present at SSU
- Assist in the design, evaluation, and implementation of training
- Identifying the mechanisms for employees to report incidents of workplace violence
- Identifying and evaluating strategies for implementing the plan across campus
- Evaluating the investigative process to ensure it adequately addresses the causes of workplace violence and allows for the correction of hazards and prevention of future incidents

Once the plan and program are finalized and fully compliant with the updated statutes, the subcommittee may dissolve upon majority vote and approval of the campuswide committee. Once dissolved, the remaining responsibilities of the subcommittee will transfer to the safety committee. These ongoing responsibilities include:

- Monthly review of any logged violent incidents and mitigations of hazardous conditions that occurred as a result of that incident (unless confidential)
- Review of any OSHA related investigations related to workplace violence
- Periodic review of risk assessments related to workplace violence site assessments
- Annual review of the Violent Incident Log, training efforts and compliance, risk assessment summary,

- Serving as the forum for ongoing discussion of identification of workplace violence related concerns/hazards, evaluation of such hazards and/or concerns, and how to correct them.

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Section III

Preventing Workplace Violence

Sonoma State University will instill a culture of safety through active and ongoing efforts to prevent workplace violence through education and training, identification of hazards and threats, and prompt investigation and correction of such hazards and threats.

Identifying Workplace Violence Hazards

Identifying conditions in the workplace that could lead to incidents of workplace violence involves a comprehensive approach including observation of how the space is used, feedback from employees, evaluation of the physical environment, and review of actual incidents, crimes, and regulatory violations in the space. Hazards contributing to workplace violence may be operational, human caused, or a result of the physical environment. Examples of hazards that contribute to workplace violence risk are below:

Operational hazards:

- Cash handling on site
- High conflict or high stress interactions
- Work with persons with mental illness, addiction, or under extreme stress
- Layoffs or other labor stresses
- Poor customer service
- Excessive overtime
- Employees working solo

Physical environment hazards:

- Public access to the space
- Physical barriers between customers and employees
- Security cameras
- See-through windows
- Adequate lighting
- Overcrowded workspaces

Human caused hazards:

- Poor supervision of employees
- Employee mental health/personal issues
- Abusive conduct
- Poor interpersonal skills
- Lack of training/poor performance

- Employee/student misconduct

The presence of any hazards in a workplace does not inherently mean a workplace is unsafe. While an incident of workplace violence may occur at any place at any time, the goal of an effective workplace prevention plan is to identify and mitigate as many hazards as possible to reduce the risk of workplace violence.

In addition to identifying hazards, it is important to recognize escalating hazards. Escalating hazards may be identified through:

- Actual incidents of workplace violence or threats
- Near miss incidents including verbal altercations
- Increases in absenteeism among employees
- Damage to or lack of care for property
- Increase in public complaints
- Increase in turnover
- Increase in grievances
- Presentation of negative performance/conduct indicators in employees (see below)

Methods for Identifying Hazards

The university will proactively identify and evaluate workplace violence hazards to help ensure the ongoing safety and security of our employees. Our comprehensive approach involves:

- Risk assessments conducted by a multidisciplinary group of employees (Workplace Safety Assessment Team (WSAT)) from the following departments identifying hazards and vulnerabilities and strategies to mitigate them:
 - Risk Management
 - EH&S
 - Facilities Management
 - Sonoma State University Police Department
 - Human Resources/Faculty Affairs & Success (both if spaces house both classifications)
- The WSAT team will provide EH&S with inspection criteria to be included in existing inspection forms. EH&S inspections are conducted on an annual basis to check for compliance fire, life/safety, ADA, general housekeeping, and campus policy compliance.

Risk assessments will be provided at least once within two years of the implementation of this plan, following any incident of workplace violence directly affecting a specific worksite, or when the university is made aware of a new or previously unrecognized hazard impacting a specific worksite(s).

Additionally, we encourage open communication with employees, providing a platform for any employee to report concerns, observations, or experiences related to workplace violence hazards. This can occur through any of the following means:

- Annual department safety meeting (this is a regularly scheduled department level meeting to cover department-specific safety issues)
- Workplace violence incident or hazard reporting form
- Direct reporting to:
 - AVP, Risk Management & Safety Services
 - AVP, Human Resources
 - AVP, Faculty Affairs & Success
 - Office of Environmental Health & Safety
 - Office for the Prevention of Harassment and Discrimination (OPHD)
 - Sonoma State University Police Department

Correcting Workplace Violence Hazards

Once identified, workplace violence hazards will be evaluated and corrected in a timely manner. Hazards will be corrected as soon as possible, based on available resources, ability to perform the work/access the space, and severity of the hazard.

Once a hazard has been identified by the WSAT, Campuswide Safety Committee, EH&S, Sonoma State University Police Department, Human Resources or other body as a workplace violence hazard, the department receiving the complaint will notify the program administrator. If there is an immediate course of action identified to resolve or significantly control the hazard, the department that identified the issue or the resolution will provide a summary of the hazard and the correction or control to the program administrator for approval. The program administrator or designee will identify the employees impacted by the hazard and correction and will communicate the information to those affected employees as soon as practicable.

If there is not an immediate course of action identified, Risk Management will convene a Safety Resolution Team (SRT) to oversee the resolution of the issue. The SRT will oversee the resolution process, which involves:

- The SRT will define the problem and the hazard presented to employees
- If the issue presents an imminent hazard to one or more employees, identify immediate control measures
- The responsible department (Facilities Management/HR/FAS) will be tasked to propose a solution within a reasonable time frame
- When a hazard cannot be fully corrected, intermediate controls will be considered to reduce the impact, scope, or severity of the hazard

- Determine a communication plan for impacted employees, including definition of the issue, hazard resolution plan, and communication through completion of the plan.
- Consider if the conditions in that workplace apply to other workplaces on campus or if the corrective measures are applicable at other locations.

The Workplace Violence Safety Resolution Team will vary based on the nature of the hazard and the department but will generally include:

- Risk Management
- EH&S
- Human Resources and/or Faculty Affairs & Success
- Facilities Management
- Sonoma State University Police Department

All workplace violence hazards and corrections/mitigations will be documented and reported to the Campuswide Safety Committee.

Recognizing Concerning Behavior in Employees

The most challenging aspect in identifying threats of workplace violence involves the identification of individuals who may pose a direct threat to the workplace, but is also a critical prevention strategy. This particular area of study is based on the post-incident examination of the actions of hundreds of offenders prior to an incident of violence to attempt to identify predicting behaviors or triggers that might help identify future offenders.

The university is currently evaluating the most effective model for the proactive identification and intervention of behavioral issues for employees and the assessment of threats and hazards associated with employee behavior. Prior to the adoption of a formal model, concerns about employee behavior will be evaluated by a consultative team consisting of leadership from the departments who are tied to the involved employee group(s) and who possess the information and the expertise to suitably resolve the situation.

While complex evaluation and intervention of employees who may be in crisis and pose a threat in the workplace is done by trained professionals, all employees should be familiar with recognizing the signs of workplace violence threats and know how to confidentially and sensitively report concerns.

Although it is possible that only one of these indicators will occur, it is more likely that a pattern will occur or that these behaviors will represent a change from normal behavior. The presence of any of these characteristics does not necessarily mean a violent act will occur, rather the behavior may be an indication of another type of problem such as being ill, depressed, bereaved, etc.

Some examples of performance and/or conduct indicators that an employee is in crisis are listed below (this listing is not intended to be all inclusive):

- attendance problems – excessive sick leave, excessive tardiness, leaving work early, improbable excuses for absences;
- adverse impact on supervisor's time – supervisor spends a disproportionate amount of time coaching and/or counseling employee about personal problems, re-doing the employee's work, dealing with co-worker concerns, etc.;
- decreased productivity – making excessive mistakes, poor judgment, missed deadlines, wasting work time and materials;
- inconsistent work patterns – alternating periods of high and low productivity and quality of work, inappropriate reactions, overreaction to criticism, and mood swings;
- concentration problems – easily distracted and often has trouble recalling instructions, project details, and deadline requirements;
- safety issues – more accident prone, disregard for personal safety as well as equipment and machinery safety, needless risks;
- poor health and hygiene – marked changes in personal grooming habits;
- unusual/changed behavior – inappropriate comments, threats, throwing objects;
- evidence of possible drug or alcohol use/abuse;
- evidence of serious stress in the employee's personal life – crying, excessive phone calls, recent separation;
- continual excuses/blame – inability to accept responsibility for even the most inconsequential errors; and/or
- unshakable depression – low energy, little enthusiasm, despair.

The following behaviors may indicate an employee is more likely to display violent behaviors:

- Perceives self as being treated unfairly and/or humiliated.
- Believes there are unfulfilled promises, i.e. waiting for a promotion or a raise that hasn't happened
- Shows signs of unpredictable behavior
- Blames others for problems
- Has strained work relationships and isolates self from others or suddenly 'becomes a loner
- Inability to manage feelings; outbursts of swearing or slamming doors
- Stated wishes for leadership to be hurt or die
- Has recently been disciplined and did not respond well to it
- Has a history at work of engaging in verbal abuse/fighting and/or uses insulting language
- Displays contempt for other workers
- Has an attitude of intimidation
- Has an obsession with weapons
- Is using or is under the influence of drugs or alcohol (including the abuse of prescription drugs)

The following is a non-inclusive list of verbal and non-verbal physical indicators of immediate distress and anger that may be displayed for the purpose of intimidation or causing a disruption in the workplace that should be immediately reported during conflict:

- Clenched fists
- Slamming doors
- Throwing objects or tools
- Getting too close – invading others personal space
- Heavy or fast breathing
- Shaking or trembling
- Angry yelling
- Foul language

Non-threatening and Misconstrued Behaviors

While the lists above are intended to assist in the identification of potentially concerning behaviors, it is important to recognize that both the expression and interpretation of behaviors may vary for those who are neurodivergent, have experienced prior trauma, or live with mental or psychological disabilities. The evaluation of behavior and the perception of the threat associated with that behavior must be considered by individuals trained and/or experienced in discerning threatening or concerning behavior from other causes and intentions.

Employees who are questioned or confronted about their behavior or about how they perceived another's behavior due to the reasons listed above can be candid about their personal perspective without fear of reprisal. In such situations, the university will work with the affected individuals to assist in providing a safe work environment that is conducive to the needs of all employees.

Reporting Concerning Behaviors

An employee exhibiting signs of being in immediate distress and who may be a threat to themselves or others should be reported to the Sonoma State University Police Department immediately by calling 911. Other, non-emergency, behaviors may be reported to the appropriate department using the [How to Report Incidents or Threats of Workplace Violence](#) section of this plan.

When reporting concerns about an employee's behavior, the reporting party should include the specific behavior that is concerning, when and where it was observed, any other persons who observed or experienced the behavior, any documentation or digital evidence of the behavior, any known circumstances in that person's life, and any incidents that may have already occurred, whether previously reported or not.

Section V

Responding to Workplace Violence

Responding to an incident or threat of workplace violence is a multi-phased process that must be focused first on the safety of those directly involved and the greater campus community, then shifting to ensuring a prompt and effective investigation and resolution, followed by examination of the response to identify any opportunities for improvements in the plan. Our response procedures reflect our commitment to maintaining a workplace where safety is paramount, fostering a culture of cooperation, trust, and well-being for all.

The response will include cooperation between multiple departments, employees, and their representatives working for a common goal.

How to Report Incidents or Threats of Workplace Violence

Any person who becomes aware or concerned about an actual or potential act of workplace violence should make a report to an appropriate university official as soon as possible. The department/official to make a report to depends upon the nature of the threat or incident.

The list below includes university departments that are integral to workplace violence prevention and response at SSU. While it is important to report an incident or concern to the most appropriate and relevant department to ensure a prompt and effective response, employees should not let confusion over where to report cause undue delay in reporting. **If the incident involves the ongoing commission of a crime, physical harm to another person, or threat to property, the report should be made to Sonoma State University Police Department without delay.**

Other than those reports that require an immediate report to SSUPD, reporters may use the workplace violence incident reporting form to report incidents or concerns over workplace violence hazards and conditions. In lieu of the reporting form, reporters may directly contact the following departments.

- The **Sonoma State University Police Department** should be notified of any imminent threat to life or property, crime, physical assault, threat of physical assault, hate crime or incident, suspicion of or incident involving abuse, or other situation that requires immediate intervention to avoid a physical altercation or ensure the safety of others.
- **The Workplace Violence Prevention Program Administrator** may be notified about any incident of workplace violence.
- **Human Resources/Faculty Affairs and Success** may be notified of any concerns over employee conduct or an incident of workplace violence that does not represent an imminent threat of violence or other concern that should be referred to SSUPD.

- **The Office for the Prevention of Harassment and Discrimination (OPHD)** may be notified of any concerns over employee conduct or an incident of workplace violence involving discrimination against another person due to age, disability (physical or mental), gender (or sex), genetic information, gender identity (including transgender), gender expression, marital status, medical condition, nationality, race or ethnicity (including color or ancestry), religion or religious creed, sexual orientation, and veteran or military status; or sexual misconduct including domestic or dating violence, sexual harassment, sexual assault or battery, rape, or stalking.

The workplace violence program webpage will include specific contact information for reporting to these individual departments.

Employees may report incidents or threats of workplace violence or concerns about workplace violence without fear of reprisal or retaliation. Any reports of reprisal or retaliation should be reported immediately to the Program Administrator. Alternatively, such reports may be directed to OSHA by calling (707) 649-3700 or emailing DIRDOSHAmericanCanyon@dir.ca.gov.

Anonymous Reporting

In addition to reporting an incident, threat, or concern to one of the departments above, employees may make an anonymous report using the workplace violence incident report form. Incidents or threats reported anonymously through the report form will be investigated to the extent possible, based on the information provided. The form data will be received by the program administrator or designee and reported to the most appropriate department based on the information in the report.

Accepting/Referring Reports

Once an incident is reported to a department, the Program Administrator should be notified as soon as practicable. Upon receipt of a report, the Program Administrator will take the following steps, based on the information known:

- Conduct an initial assessment of the report to determine if the report falls within the workplace violence definitions; if the report is determined to not be related to workplace violence, see [Unfounded and Non-Workplace Violence Incident Reports](#)
- Determine the appropriate department(s) for investigation; the administrator may convene a review team consisting of SSUPD, HR/FAS, OPHD, and/or other officials to consult on the appropriate referrals
- Identify and refer any immediate remediations or corrective measures to ensure the safety of impacted employees
- Seek periodic updates from the investigating department to ensure the investigation is completed, the violent incident log is completed and posted, and determine if additional hazard resolutions may be needed.

Unless the report is made to SSUPD, reports will generally only be accepted and referred on university business days.

The officials with whom the program administrator may consult with may be from:

- **HR/FAS** should be consulted for all incidents or threats of workplace violence.
- **The Sonoma State University Police Department** should be immediately notified when there is any imminent threat to life or property, and should be consulted when there is information indicating that an assault, act of violence, threat of violence, and/or a crime has occurred or is threatened.
- **OPDH** should be consulted when the act or threat involves discrimination or sexual misconduct.
- **Student Affairs** should be consulted when the act or threat involves one or more students or could directly impact students.

Once a department accepts a report that has been referred to that department, that department official is responsible for ensuring that the report is appropriately investigated and responded to (see [Responding to Workplace Violence](#)). That response includes communicating the incident or threat to other impacted employees. That department official should identify what other university officials should be consulted with as part of the response and communication plan.

If, at any time, the responsible department determines that the report is unfounded, is not defined under the workplace violence definitions, or should be investigated by another department, they should make the appropriate referral and notify the Program Administrator.

Confidential Information

There may be information included in a report that are confidential and cannot be shared with other university personnel pursuant to this plan. In such instances, those departments must consider which information is necessary to be reported for the purpose of the workplace violence report and what information is restricted to the reported department.

In the event that there is inadequate information that may be released by the receiving department to support an administrative investigation, the receiving department will provide the plan administrator with the minimum information required to complete the Violent Incident Log. The plan administrator will determine, based on that information, if adequate information exists to conduct a full review of the hazards that may have contributed to the incident.

When there is uncertainty about the confidentiality of certain information that cannot be resolved between the reporting department and the plan administrator, the Office of General Counsel should be consulted.

Unsubstantiated and Non-Workplace Violence Incident Reports

If, at any time from the initial report through the investigation, there is a determination that a report is unsubstantiated or is not defined under the workplace violence definition, the following steps will be taken and documented by the responsible department or Program Administrator:

- If determined by the responsible department, notification to the Program Administrator, including the information that led to the determination that the report is unsubstantiated or not workplace violence related.
- If the report is only deemed not workplace violence related, the responsible department will determine if the report still requires notification and/or investigation through any other legal requirement or responsibility the university bears. This may occur through a consultative process as occurred during report intake.
- Determine, in consultation with at least the Program Administrator, if it is necessary and appropriate to communicate the determination to the reporting party, victim, perpetrator, or other impacted employees.

Emergency Response

Upon report of an incident of workplace violence or threat of violence, the university will prioritize the safety of all persons when responding. The Sonoma State University Police Department will have primary authority for response and control of any scene where there is an imminent threat to life or property, where a crime is or has occurred, or any other situation that requires immediate intervention to avoid a physical altercation or ensure the safety of others.

Reporting Emergencies

If the incident is in progress and warrants a police notification as defined above, the reporting party should call 911 with the following information, if known;

- Involved parties (university, non-university)
- Nature of incident
- Injuries, if known/applicable
- Medical transport, if known/applicable
- Location where incident occurred
- Current location of involved employee(s)
- Any information about the nature of the dispute

Police Response

The SSUPD will follow established response procedures following the report of any workplace violence incident emergency. If the incident is not deemed an emergency, the department will follow existing protocol to respond and investigate, if appropriate. SSUPD's investigation is limited to criminal violations or other matters under the department's purview but will not

address administrative or university policy violations. Once the department has reason to believe that the incident meets the definitions for workplace violence, they will notify the Plan Administrator using department procedures. SSUPD will follow existing protocols for the provision of security measures, support services, or other mitigating measures to ensure the safety of the involved parties.

To ensure the safety of potentially impacted persons or the campus community, SSUPD will follow existing communication protocols. The protocols are outlined in the [Reporting Incidents of Workplace Violence to Employees](#) section below.

SSUPD will follow existing procedures for referrals and reports pursuant to other statutory requirements including Title IX, the Clery Act, Donahoe Act, child abuse reporting requirements, etc. regardless of the case also involving workplace violence.

Initial Non-emergency Response

Following a report of an incident of workplace violence or incidents, threats, or conduct requiring investigation under this program, the Program Administrator will either convene a consultative group to consider the investigation and communications plan or will make the appropriate notifications if that determination is made without consultation. Human Resources (non-faculty employee(s) or Faculty Affairs & Success (faculty) (HR/FAS) will be notified of all reports of workplace violence that are at least initially validated by the Program Administrator.

HR/FAS will endeavor to contact the involved employee(s)** to determine their welfare and current condition and location. No attempt should be made at this time to investigate the matter. HR/FAS will follow existing protocols for notification to employee emergency contact, if applicable. If not already in contact, HR/FAS will also contact the affected employee(s) manager(s). HR/FAS and the employee's manager, in consultation with the employee, if possible/appropriate, must consider:

- Is the employee able to continue work? Can they change the modality of work?
- If the employee is faculty and unable to work, how will students be notified?
- Is there a reason that the employee should not return to their normal worksite?
- Does the employee or those around the employee require additional security measures?
- What other support measures may be needed for the employee or the work unit?
- Do one or more employees need to be separated from each other temporarily?
- Are the employee's injuries reportable under worker's compensation?
- Are the employees injuries reportable to OSHA?
- Are any other notifications necessary as a result of this incident (conditional to the setting - Children's School, Nursing, Health Center, CAPS, Office of Student Conduct, etc.)

In addition to the employee(s) directly involved in the incident, HR/FAS will work with the involved manager(s) to ensure the safety and well being of any employees who were witness to or who otherwise feel/felt threatened by the incident. This may involve additional security

measures, support measures beyond the Employee Assistance Program (EAP), or other adjustments to department operations.

HR/FAS will take care during the initial response to ensure the health and safety, including mental health, of the involved employees. Any accommodations, however, are subject to the conditions of the collective bargaining agreements, when applicable, and university policy.

** SSU Police Department is the appropriate police agency for any incident occurring on the main campus of Sonoma State University or at the Fairfield Osborn Preserve. Employees who are regularly assigned to alternate worksites are encouraged to identify the police agency and contact information for that location. In such cases, the manager of the worksite is responsible for reporting the incident to another appropriate university official.*

*** In the event an involved employee is in custody (under arrest), Human Resources will work with the Chief of Police or designee to coordinate any contact with the employee, when appropriate.*

Adjustments to Department Operations

When considering additional security measures or accommodations to ensure the safety or well-being of employees who have experienced or been witness to an incident of workplace violence, managers may consider adjustments to department operations. Such adjustments may include closing offices to the public, changes in office hours, pivot to remote operations, or temporary closure of an office. Existing university protocol requires such adjustments be approved by the Vice President for each unit. Any suspension of operation or closure of an office requires the approval of the University President.

Note, the Chief of Police may order an evacuation of any space for life/safety reasons or may close an area for safety reasons or if designated a crime scene. These circumstances do not change the Vice Presidential approval requirement, but should be shared as part of the consideration in making adjustments.

Reporting Incidents of Workplace Violence to Employees

Once the university is aware of an incident or threat of workplace violence, the report will be investigated and reported to any other employees that may be directly impacted as soon as practicable. When making notification, the university will notify impacted employees of the **presence, location, and nature of the incident**, when known.

When reporting incidents or threats of workplace violence to employees, in order to consider the appropriate mechanism for notification, the department official in charge of the incident must consider whether the incident or threat:

- may cause physical injury or harm
- is imminent or represents a future or potential incident
- impacts all of campus, subsets of campus, or even a single individual

Any of these considerations may impact the manner in which employees are notified. However, the department official in charge will endeavor to utilize existing notification protocols, when possible. Mechanisms for notification include, but are not limited to:

- Activation of the emergency notification system, per Executive Order 1052 and university internal protocols (limited to Sonoma State University Police Department and Clery Director)
- Issuance of a timely warning crime alert, per Executive Order 1052 and university internal protocols (limited to Sonoma State University Police Department and Clery Director)
- Police crime bulletins (limited to Sonoma State University Police Department)
- Issuance of additional standardized police crime alerts and bulletins (such as Amber Alerts, Silver Alerts, etc.) (limited to Sonoma State University Police Department)
- Campuswide emails
- Departmental or other targeted communications to impacted employees
- In-person or virtual meetings for impacted individuals
- Telephone calls to impacted individuals

Any notification will include the location and nature of the incident. Instructions for evacuation or lockdown/shelter in place will be pursuant to procedures established in department and building emergency plans. Employees are expected to be familiar with these plans prior to any emergency. Contact the [SSU Office of Emergency Services](#) for more information.

Once an incident is resolved and any evacuation or lockdown/shelter in place orders are lifted, an “all clear” message will be issued or individual units or employees will be notified that the threat has been resolved.

Once an investigation is complete, the department official in charge will determine if additional notifications to the impacted employees is appropriate. All communication regarding personnel actions, criminal charges, or student conduct actions related to the incident will be pursuant to existing procedures. If the incident results in changes to the workplace to address existing hazards, communication will be made pursuant to the [Post-incident Response](#) section of this plan.

Administrative Investigation Response

Incidents of workplace violence, including threats, will be promptly and thoroughly investigated by the university. The university will use existing protocols for investigation, depending on the type of violence and the circumstances known about the conflict. These investigations are separate from criminal investigations conducted by the Sonoma State University Police Department (or the police agency of jurisdiction where the incident occurred). Although one department may be designated as the primary investigating department, multiple investigations may be concurrent and ongoing.

- **Type 1 Violence** (Employee and non-campus person(s)):
 - HR/FAS, if preliminary information indicates the employee played a role or may have played a role in instigating, initiating, or causing violence
 - SSUPD (exclusively), if preliminary information indicates the employee did not play a role in instigating, initiating, or causing violence (this is not an administrative investigation)
 - OPHD, if preliminary information indicates the employee was targeted as a result of an act of discrimination or sexual misconduct
- **Type 2 Violence** (Employee(s) and customers/clients/students/visitors/etc):
 - HR/FAS, if preliminary information implicates the employee played a role or may have played a role in instigating, initiating, or causing violence
 - SSUPD (exclusively), if preliminary information indicates the employee did not play a role in instigating, initiating, or causing violence and the aggressor was a non-campus person (this is not an administrative investigation)
 - OPHD, if preliminary information indicates the employee was targeted as a result of an act of discrimination or sexual misconduct
 - Student Conduct, if preliminary information indicates the employee did not play a role in instigating, initiating, or causing violence and the aggressor was a university student
- **Type 3 Violence** (Employee(s) and other current/former employee/manager):
 - HR/FAS, if preliminary information implicates the employee played a role or may have played a role in instigating, initiating, or causing violence
 - OPHD, if preliminary information indicates the employee was targeted as a result of an act of discrimination or sexual misconduct
- **Type 4 Violence** (Employee(s) and personal relationship):
 - HR/FAS, if preliminary information implicates the employee played a role or may have played a role in instigating, initiating, or causing violence
 - SSUPD (exclusively), if preliminary information indicates the employee did not play a role in instigating, initiating, or causing violence

All investigations involving represented members will follow protocols allowing for representation pursuant to applicable collective bargaining agreements.

In consultation with the appropriate departments, HR/FAS will determine if appropriate safety and supportive measures should be implemented during the investigation, regardless of where the investigation began.

The outcomes of investigation will also be pursuant to established protocols related to employee discipline.

Post-Incident Response

Following an incident, the university will review and evaluate the incident response to determine if the program worked effectively to prevent and respond to incidents of workplace violence. Post-incident reviews generally will be conducted by Environmental Health & Safety. EH&S management are trained in incident investigation, focused on root-cause analysis and program evaluation and improvement. The university may elect to utilize outside investigators for especially complex, mass casualty incidents, or in the absence of adequately trained EH&S personnel.

EH&S will lead the review with a multidisciplinary group of employees who were involved in the initial response, with the aim being no-fault program improvement. The post-incident review will focus (as applicable) on the following:

- Current program compliance
- Impact of prevention efforts on impacted employees/departments
- Security measures in place for impacted employee(s)
- Effectiveness of security measures in place
- Presence of conduct indicators for offender(s)
- Preliminary response of university management to initial concerns/complaints from employee(s)
- Root cause of incident, as related to the university, it's facilities and it's programs/policies
- Employee feedback on supportive measures, investigative process, and overall program efficacy
- Deficiencies/opportunities for improvements in the WVPP or other policies/programs that may enhance employee safety

EH&S will document the review in a report, removing all identifying information of involved parties, focusing on the programmatic elements. The WVPP requires annual review and updating, and a review following a workplace violence incident. The review will be noted in the WVPP, even when no program changes are recommended. When program improvements are recommended, they will be incorporated into the program, implemented, and communicated immediately.

Section VI

Training

All employees, including managers, are required to have training and instruction on this plan, including:

- Key definitions
- How to report workplace violence incidents or concerns
- Workplace violence hazards specific to an employee's role
- How to seek assistance to prevent or respond to violence
- Strategies to avoid physical harm
- Knowledge of how to access the most up-to-date version of this plan.
- How employees can participate in the development, implementation, and maintenance of this plan.

Initial training will be provided through the systemwide CSU Learn training module.

Additionally, all employees with direct responsibility for investigation and reporting related to this plan (plan partners) will be trained in the program requirements and procedures.

Program Training and Education

The university's WVPP general employee training efforts include the following:

- New employee orientation, including a discussion of workplace hazards identification and reporting channels.
- Annually scheduled training through CSU Learn
- A minimum of one in person or virtual training and engagement session per year where employees are permitted the opportunity to ask questions and get answers about the plan; this session may be offered as a stand alone training or will be hosted by the Campuswide Safety Committee in a format that is open to all employees to participate in
- Dedicated workplace violence website including reporting channels, tools to recognize potential threats, the Violent Incident Log, and safety and support services.
- Annual email communication notifying employees about workplace hazards, violent incidents, threats, and other workplace violence concerns, which includes anonymous reporting channels, and information about the rights of employees to report incidents, threats, or concerns with fear of reprisal, retaliation or adverse action.

Training and instruction about this plan are provided:

- When this plan is first established.
- To all employees annually.

- Whenever new or previously unrecognized workplace violence hazards have been identified; or
- When changes are made to this plan.

To the extent that training is provided when a new or previously unrecognized workplace violence hazard has been identified – or when changes are made to this plan – such training is only required to cover the new hazards and/or changes to this plan.

Plan Partners Training

Plan partners are those employees who play a direct role in the development, implementation, and execution of this plan. They will receive training as employees who are covered by this plan but also require advanced training as plan partners.

Plan partner training will be directed by the Plan Administrator and specific to their department's responsibilities. The Plan Administrator designates Environmental Health & Safety as the department responsible for Plan Partner training, which will include:

- How to identify workplace violence incidents and reports
- How to report workplace violence incidents the Plan Administrator
- Methods to prevent workplace violence
- How to identify hazards that may contribute to workplace violence
- Available supportive and security measures to ensure the safety of impacted employees of workplace violence and how to recommend/implement said measures
- Services provided by other Plan Partners as related to the WVPP
- Post-incident investigative and improvement process

Training will be provided to new employees within 90 days of employment to Plan Partners and refresher training will be provided annually. Refresher training will include a summarization of the initial training along with a focus on plan updates and may include a focus on enhancing university response efficacy based on prior incidents.

Section VII

Workplace Violence Records

Violent Incident Log

Environmental Health & Safety will maintain the Violent Incident Log. The department official in charge will work with EHS to ensure they have adequate information to complete the log.

The information included on the log will be based on information solicited from the employees who experienced the workplace violence, on witness statements, and on investigation findings.

The log must include the following information:

- Date/time/location of the incident.
- The workplace violence type or types involved in the incident.
- A detailed description of the incident.
- Classification of the perpetrator (e.g., client, customer, friend, coworker, etc.).
- Classification of circumstances at the time of incident (e.g., working regular job duties, rushed, working during low staffing, isolated/alone, working in unfamiliar or new location, poorly lit area, etc.).
- Classification of the location where the incident occurred.
- Whether security or law enforcement was contacted.
- Actions taken by the employer to protect the employee or other hazards identified because of the incident.
- Information about the person completing the log, including name, job title, and date completed.
- The type of incident
 - Physical attack without a weapon (e.g. biting, choking, grabbing, hair pulling, kicking, punching, slapping, pushing, pulling, scratching, spitting)
 - Attack with a weapon or object
 - Threat of physical force or threat of the use of a weapon or other object
 - Sexual assault or threat (e.g. rape, attempted rape, physical display, or unwanted verbal or physical sexual contact)
 - Animal attack
 - Other

The log does *not* include any personal identifying information sufficient to allow the identification of any person involved in a violent incident.

If an incident on university property involved or impacted employees of a university contractor or auxiliary, the employer or employers whose employees experienced the workplace violence incident shall record the information in a violent incident log pursuant to their workplace policies

and shall also provide a copy of that log to Sonoma State University Office of Environmental Health & Safety as soon as practicable.

Please contact the Director for Environmental Health and Safety, email safety@sonoma.edu, visit ehs.sonoma.edu, or call (707) 664-2100 for copies of any of these records. Logs will begin July 1, 2024.

Access to WVPP Records

A copy of Sonoma State University's WVPP shall be kept in writing and made available and easily accessible to employees, authorized employee representatives, and representatives of Cal-OSHA at all times. The WVPP will be posted online at <https://risk.sonoma.edu/safety/workplace-violence-prevention>. A printed copy of the plan may be obtained by contacting the Office of Environmental Health & Safety or the University Records Office.

The following records shall be maintained by the Office of Environmental Health & Safety and will 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.

Records of workplace violence incident investigations shall be maintained for a minimum of five years. These records shall not contain "medical information," as defined in subdivision (j) of Section 56.05 of the Civil Code. Incident investigation records, as well as the WVPP, Records of workplace violence hazard identification, evaluation, and correction, training records, and violent incident logs will be made available to Cal-OSHA upon request.

Section VIII

Records Maintenance

Sonoma State University is required to:

- 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 a violent incident log for each workplace violence incident and must maintain such records for at least five (5) years.
- Maintain records of workplace violence incident investigations for a minimum of five (5) years. *(The records shall not contain medical information per subdivision (j) of section 56.05 of the Civil Code.)*

Records should be maintained only for the required timeframe unless otherwise required to be retained due to pending claim, litigation, or other legal order.

Workplace violence incidents may also involve crimes or violations that are regulated under the Clergy Act, Title IX, Title V, or other regulatory authority. Reports of such crimes or policy violations must still be reported using established protocols and records maintained pursuant to applicable requirements.

Section IX

Plan Maintenance

This plan will be reviewed and updated for effectiveness:

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

Review of the WVPP will include:

- Incident investigations and the violent incident log.
- Control measures in place and the effectiveness of those controls.

All plan reviews will include the opportunity for a representative from the following operational areas:

- Environmental Health & Safety
- Human Resources
- Faculty Affairs and Success
- Sonoma State University Police Department
- Office for the Prevention of Discrimination and Harassment
- A member of each bargaining group and their representatives

Plans reviews will take place during the academic year to ensure all employees may participate. Plan reviews will be documented through agendas and minutes and posted to the WVPP website.