

## Workplace Violence Prevention Plan

Keck Graduate Institute's (KGI) Workplace Violence Prevention Plan (WVPP) addresses the hazards known to be associated with the four types of workplace violence as defined by [Labor Code \(LC\) section 6401.9](#).

**Date of Last Review:** June 26, 2024

**Date of Last Revision(s):** June 26, 2024

### 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 is required by LC section 6401.9.

**Plan** - The workplace violence prevention plan is 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,

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 used to effectively reduce workplace violence hazards.

## RESPONSIBILITY

The WVPP administrators, Cheryl Merritt, Assistant Vice President and Chief Human Resources Officer, and Trevor Garrett, Interim Vice President of Finance and Administration, have the authority and responsibility for implementing the provisions of this plan for KGI. If multiple persons are responsible for the plan, their roles will be clearly described.

Responsible Persons	Job Title/ Position	WVPP Responsibility(ies)	Phone Number	Email
Mohamed Abousalem	President	<p>Allocate resources for training, security measures, and support services.</p> <p>Lead by example and promote a culture of respect and zero tolerance for violence.</p>	909-607-0107	<a href="mailto:President@kgi.edu">President@kgi.edu</a>
Cheryl Merritt	Assistant Vice President and Chief Human Resources Officer	<p>Develop and implement workplace violence prevention policies and procedures.</p> <p>Develop and enforce policies related to employee conduct, harassment, and violence prevention.</p> <p>Provide training and education to employees on recognizing and responding to signs of potential violence.</p> <p>Investigate complaints or reports of workplace violence and take appropriate disciplinary action.</p>	909-607-7783	<a href="mailto:Cheryl_Merritt@kgi.edu">Cheryl_Merritt@kgi.edu</a>

<p><b>In partnership:</b></p> <p>Trevor Garrett</p> <p>Efrain Chacon</p>	<p>Interim Vice President of Finance and Administration</p> <p>KGI Campus Safety</p>	<p>Respond promptly to reports or incidents of workplace violence and assist in emergencies.</p> <p>Provide guidance and support to employees during emergencies, including communication protocols and evacuation procedures.</p> <p>Serve as a liaison between the organization and external agencies, such as law enforcement and emergency responders, during an active assailant incident.</p> <p>Develop and implement safety procedures specific to active assailant incidents, including evacuation routes, shelter-in-place protocols, and response actions.</p> <p>Ensure employees are trained in these procedures and conduct regular drills to practice response actions.</p> <p>Monitor and enforce access controls, surveillance systems, and physical security measures.</p> <p>Conduct risk assessments and recommend security enhancements as needed.</p> <p>Implement measures to mitigate risks, such as enhancing physical security, improving access controls, and installing panic alarms.</p>	<p>909-607-0002</p> <p>909-607-8736</p>	<p><a href="mailto:Trevor_Garrett@kgi.edu">Trevor_Garrett@kgi.edu</a></p> <p><a href="mailto:KGI Campus Safety@kgi.edu">KGI Campus Safety@kgi.edu</a></p>
<p><b>In partnership:</b></p> <p>Trevor Garrett</p>	<p>Interim Vice President of Finance and Administration</p>	<p>Implement and enforce physical security measures, such as access controls and surveillance systems.</p> <p>Coordinate with law enforcement to secure the premises and restrict access to affected areas.</p> <p>Assist in evacuating employees and guiding them to safe locations.</p> <p>Ensure that emergency</p>	<p>909-607-0002</p>	<p><a href="mailto:Trevor_Garrett@kgi.edu">Trevor_Garrett@kgi.edu</a></p>

Katrina Minor	CBRE Account Manager	<p>communication systems, such as alarms and intercoms, are functioning properly.</p> <p>Provide guidance to employees on sheltering in place and seeking refuge in designated safe areas.</p> <p>Assess the physical security of the facility and address any damage or vulnerabilities.</p> <p>Assist in the recovery efforts, including facility repairs and restoration of normal operations.</p>	840-229-0827	<a href="mailto:Katrina.Minor@cbre.com">Katrina.Minor@cbre.com</a>
Kenneth Mashinchi	Vice President of Marketing and Communications	<p>Designate a spokesperson to communicate with the media and the public.</p> <p>Establish a crisis hotline or helpline for employees to seek assistance.</p>	909-607-7176	<a href="mailto:Kenneth_Mashinchi@kgi.edu">Kenneth_Mashinchi@kgi.edu</a>
Kelli Sarslow	Director of Benefits Administration	<p>Provide confidential counseling and support services to employees experiencing stress, conflict, or other issues that may contribute to workplace violence.</p> <p>Educate employees on coping strategies, stress management techniques, and resources available through the EAP.</p>	909-607-4130	<a href="mailto:Kelli.Sarslow@claremont.edu">Kelli.Sarslow@claremont.edu</a>

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

## EMPLOYEE ACTIVE INVOLVEMENT

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

- Administration will work with and allow employees and authorized employee representatives to participate in:
  - Safety Committees
  - Surveys and Questionnaires
  - Training and Workshops
  - Safety Audits and Inspections
  - Simulation Exercises
  - Feedback Mechanisms

- Recognition and Rewards
- Reporting and investigating workplace violence incidents by:
  - Implementing formal procedures for employees to report workplace violence, incidents, threats, or concerns.
  - Providing multiple reporting channels such as telephone numbers, online forms, email, or in-person reporting to accommodate different preferences and needs.
  - Ensuring confidentiality and non-retaliation for employees who report incidents.
  - Written incident reports
  - Establishing protocols for immediate notification of supervisors, managers, or designated response teams in the event of a workplace violence incident.
  - Implementing emergency communication systems, alarms, or notification chains to alert relevant personnel quickly.
  - Conducting interviews with employees involved in or witnessing the incident to gather firsthand accounts and details.
  - Maintaining detailed records of workplace violence incidents, investigations, and corrective actions taken.
  - Documenting investigation findings, conclusions, and recommendations for future prevention efforts.
  - Conducting root cause analysis to identify underlying factors contributing to workplace violence incidents.
  - Implementing corrective actions based on investigation findings and recommendations.
- Participate in training sessions on recognizing the warning signs of potential violence, de-escalation techniques, and conflict resolution skills.
- Stay informed about workplace violence prevention policies, procedures, and resources provided by the organization.
- Report any incidents, threats, or concerns related to workplace violence to their supervisor, human resources, or designated security personnel.
- Stay vigilant and aware of their surroundings, recognizing any unusual or suspicious behavior that may indicate a potential threat.
- Participate in workplace safety committees or teams dedicated to violence prevention, providing input and feedback on policies, procedures, and training programs.
- Engage in drills and exercises to practice response actions in the event of an active assailant or other violent incident.
- Support colleagues who may be experiencing stress, harassment, or other issues that could potentially escalate into violence.
- Foster a workplace culture of respect, tolerance, and inclusivity, where all employees feel valued, supported, and safe.
- Lead by example and demonstrate respectful and professional behavior in all interactions with colleagues and customers.
- Participate in post-incident debriefings and discussions to identify lessons learned and implement

changes to enhance safety and security.

- Administration 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**

Our plan ensures 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 that create a security hazard for others in the workplace, including at a minimum:

- Training employees, supervisors, and managers in the provisions of KGI's Workplace Violence Prevention Plan (WVPP)
- Effective procedures to ensure that supervisory and nonsupervisory employees comply with the WVPP through training and education, providing a copy of the WVPP to all employees through employee handbooks, policy manuals, or intranet portals, regular communication, and reinforcement, providing multiple reporting channels, and investigation and follow-up.
- Provide retraining to employees whose safety performance is deficient with the WVPP.
- Recognizing employees who demonstrate safe work practices that promote the WVPP in the workplace through verbal recognition and internal communications.
- Discipline employees for failure to comply with the WVPP.

## **COMMUNICATION WITH EMPLOYEES**

We recognize that open, two-way communication between Administration, staff, faculty, alumni, other employers, and campus visitors 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 the Administration, faculty, 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 with an open door policy, regular meetings, anonymous reporting systems, safety committees, employee surveys, regular communication channels, and an employee assistance program (EAP).
- Posted or distributed workplace violence prevention information.
- Employees can report a violent incident, threat, or other workplace violence concern to KGI or law enforcement without fear of reprisal or adverse action through verbal reporting to managers and supervisors, email or written reports, online reporting on the Human Resources website, and safety

committees.

- 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. They will be informed of the results of the investigation and any corrective actions to be taken through the following methods:
  - Updates on the status of investigations and corrective actions are provided to employees through email and at safety meetings. These updates could include information about the progress of investigations, the results of investigations, and any corrective actions taken.
  - 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. These meetings could involve sharing updates to the plan, discussing recent incidents, and coordinating training sessions.

## **COORDINATION WITH OTHER EMPLOYERS**

KGI will implement the following effective procedures to coordinate 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 in workplace violence prevention.
- Workplace violence incidents involving any employee are reported, investigated, and recorded.

## **WORKPLACE VIOLENCE INCIDENT REPORTING PROCEDURE**

KGI 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 administrators. This will be accomplished by contacting them in person, through email, phone, or by contacting Human Resources at [hr@kgi.edu](mailto:hr@kgi.edu). If that's not possible, employees will report incidents directly to the WVPP administrators, Cheryl Merritt, Assistant Vice President and Chief Human Resources Officer, and Trevor Garrett, Interim Vice President of Finance and Administration.
  - Workplace Violence Reporting Hotline: 909-607-8736
  - [KGI Incident Reporting Form](#)

A strict non-retaliation policy is in place, and any instances of retaliation are dealt with swiftly and decisively. Any employee retaliating against another employee for reporting an incident could be disciplined.

## **EMERGENCY RESPONSE PROCEDURES**

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

- Effective means to alert employees of the presence, location, and nature of workplace violence emergencies by the following:
  - Text and email will be used to alert employees of emergencies.
- KGI will have [evacuation](#) or sheltering plans such as [evacuation maps with routes and assembly areas](#), emergency bags/kits in designated areas, [signs on all emergency exits](#), and [instructions for sheltering in place](#).
- How to obtain help from staff, faculty, security personnel, or law enforcement:

- If there is immediate danger, call KGI Campus Safety at 909-607-8736 and/or emergency assistance by dialing (9) 9-1-1 (dial outside access number first if applicable) and then notify the WVPP administrators, Cheryl Merritt, Assistant Vice President and Chief Human Resources Officer, and Trevor Garrett, Interim Vice President of Finance and Administration.

In the event of an emergency, including a Workplace Violence Emergency, contact the following:

Responsible Persons	Job Title/ Position	WVPP Responsibility(ies)	Phone Number	Email
<b>In partnership:</b> Trevor Garrett	Interim Vice President of Finance and Administration	Respond to reports or occurrences of workplace violence and provide aid during emergencies.	909-607-0002	<a href="mailto:Trevor_Garrett@kgi.edu">Trevor_Garrett@kgi.edu</a>
Efrain Chacon	KGI Campus Safety	Additionally, serves as a bridge between the organization and external entities, such as law enforcement and emergency responders, particularly in the event of an active assailant situation.	909-607-8736	<a href="mailto:KGI Campus Safety@kgi.edu">KGI Campus Safety@kgi.edu</a>
<b>In partnership:</b> Trevor Garrett	Interim Vice President of Finance and Administration	Provide support during the aftermath of incidents, including facilitating debriefing sessions, evaluating the efficacy of response measures, and extracting key insights for future improvements.	909-607-0002	<a href="mailto:Trevor_Garrett@kgi.edu">Trevor_Garrett@kgi.edu</a>
Katrina Minor	CBRE Account Manager		840-229-0827	<a href="mailto:Katrina.Minor@cbre.com">Katrina.Minor@cbre.com</a>
Cheryl Merritt	Assistant Vice President and Chief Human Resources Officer	Investigates reported instances of workplace violence and applies suitable disciplinary measures as necessary.	909-607-7783	<a href="mailto:Cheryl_Merritt@kgi.edu">Cheryl_Merritt@kgi.edu</a>

## WORKPLACE VIOLENCE HAZARD IDENTIFICATION AND EVALUATION

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

- Inspections shall be conducted when the plan is established, after each workplace violence incident, and when the employer is made aware of a new or previously unrecognized hazard.
- Review all submitted/reported concerns of potential hazards from the following: [KGI Incident Reporting Form](#), Human Resources hotline messages, emails, and voicemails.

### 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 when a new hazard is identified when a hazard complaint is received, and as often as needed.

Periodic inspections to identify and evaluate workplace violence and hazards will be performed by the following designated personnel in the following areas of the workplace:

Specific Person Name/Job Title	Area/Department/Specific location
Jasmine Yu, Laboratory Safety Manager Jamie Liu, Laboratory Manager	KGI Laboratories
Efrain Chacon, KGI Campus Safety	Buildings 215, 517, 535, 555, and Oasis
Katrina Minor, CBRE Account Manager	Buildings 215, 517, 535, 555, Oasis, and Shipping and Receiving
Cheryl Merritt, Assistant Vice President and Chief Human Resources Officer	Buildings 215, 517, 535, 555, and Oasis
Trevor Garrett, Interim Vice President of Finance and Administration	Buildings 215, 517, 535, 555, and Oasis

Inspections for workplace violence hazards include assessing:

- The exterior and interior of the workplace for its attractiveness to robbers.
- The need for violence surveillance measures, such as mirrors and cameras.
- Procedures for employee response during a robbery or other criminal act, including our policy prohibiting employees who are not security guards from confronting violent persons or persons committing a criminal act.
- Procedures for reporting suspicious persons or activities.
- Effective location and functioning of emergency buttons and alarms.
- Posting of emergency telephone numbers for law enforcement, fire, and medical services.
- Whether employees have access to a telephone with an outside line.
- Whether employees have effective escape routes from the workplace.
- Whether employees have a designated safe area to go to in an emergency.
- Adequacy of workplace security systems, such as door locks, entry codes or badge 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.
- Employees' skill in safely handling threatening or hostile service recipients (for example, security guards).
- Effectiveness of systems and procedures that warn others of actual or potential workplace violence danger or summon assistance, e.g., alarms.
- The use of work practices such as the "buddy" system for specified emergency events.
- The availability of employee escape routes.
- How well our establishment's Administration 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. KGI 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 who are required to correct the hazardous condition will be provided with the necessary protection. Facilities Services and KGI Campus Safety employees will receive additional training/PPE to correct hazardous conditions.
- All corrective actions taken will be documented and dated on the appropriate forms.
- Corrective measures for workplace violence hazards will be specific to a given work area.
- Make the workplace unattractive to robbers by:
  - Improve lighting around and at the workplace.
  - Post signs notifying the public that cameras are monitoring the facility.
  - Utilize surveillance measures, such as cameras and mirrors, to provide information about what is happening outside and inside the workplace and dissuade criminal activity.
  - Have Campus Safety Officers patrol the workplace interior and perimeter.
  - Install security surveillance cameras in and around the workplace.
  - Provide workplace violence systems, such as door locks, physical barriers, emergency alarms, and restraint systems.
  - Post emergency telephone numbers for law enforcement, fire, and medical services.
  - Control, access to, and freedom of movement within the workplace by non-employees include recently discharged employees or persons with whom one of our employees is having a dispute.
  - Install effective systems to warn others of the danger of violence or to summon assistance, e.g., alarms.
  - Ensure employees have access to a telephone with an outside line. Provide employee training/retraining(refreshers) on the WVPP, which could include but is not limited to the following:
    - Recognizing and handling threatening or hostile situations that may lead to violent acts by persons who are service recipients of KGI.
    - Ensure that all reports of violent acts, threats of physical violence, verbal abuse, property damage, or other signs of strain or pressure in the workplace are handled effectively by Administration, managers, and supervisors and that the person making the report is not subject to retaliation by the person making the threat.
    - Improve how well KGI's Administration and employees communicate with each other.

- Procedures for reporting suspicious persons, activities, and packages.
- Provide/review employee, supervisor, and manager training on emergency action procedures.
- Ensure adequate employee escape routes.
- Increase awareness by employees, supervisors, and managers of the warning signs of potential workplace violence.
- Ensure that employee disciplinary and discharge practices address the potential for workplace violence.
- Establish a policy for prohibited practices.
- Provide procedures for a "buddy" system for specified emergency events.

## **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.
- Interview 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: (See attached Violent Incident Log)
  - 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 any other hazards identified due to the incident.
  - Information about the person completing the log, including their name, job title, and the date completed.
- Reviewing all previous incidents.
- Provide information regarding Employee Assistance Program (EAP)-Optum (Support and resources, such as counseling services, are provided to affected employees).

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

## **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 online training, 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.

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

- KGI's WVPP, how to obtain a copy of KGI's plan at no cost, and how to participate in developing and implementing KGI's plan.
- How to report workplace violence incidents or concerns to the employer or law enforcement without fear of retaliation.
- Workplace violence hazards specific to the employees' jobs, the corrective measures KGI 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 KGI has for interactive questions and answers with a person knowledgeable about KGI's plan.
- 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 use identified escape routes or locations for sheltering.
- Employee routes of escape.
- Emergency medical care is 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**

KGI ensures that the WVPP plan shall be in writing and available and easily accessible to employees, authorized employee representatives, and representatives of Cal/OSHA at all times. This will be accomplished by:

- KGI will furnish a printed copy of the written Workplace Violence Prevention Plan (WVPP) upon request by an employee or their designated representative unless they opt to receive an electronic version.
- We will provide unobstructed access through a company server or website, allowing an employee to review, print, and email the current WVPP version. Unobstructed access means that the employee predictably and routinely uses electronic means to communicate with managers, supervisors, or co-employees as part of their regular work duties.

## **RECORDKEEPING**

KGI 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.
- 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.



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.

**EMPLOYEE ACCESS TO RECORDS**

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.

**REVIEW AND REVISION OF THE WVPP**

The KGI WVPP will be reviewed for effectiveness:

- At least annually.
- When a deficiency is observed or becomes apparent.
- After a workplace violence incident.
- 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 KGI’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, KGI 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.

“I, Cheryl Merritt, Assistant Vice President and Chief Human Resources Officer of Keck Graduate Institute, hereby authorize and ensure the establishment, implementation, and maintenance of this written workplace violence prevention plan and the documents/forms within this written plan.”

*Cheryl Merritt*  
\_\_\_\_\_

6/27/24  
\_\_\_\_\_

Signature

Date

## Violent Incident Log

This log must be used for every workplace violence incident that occurs in our workplace. At a minimum, it will include the information required by LC section 6401.9(d).

The information that is recorded will be based on:

- Information provided by the employees who experienced the incident of violence.
- Witness statements.
- All other investigation findings.

All information that personally identifies the individual(s) involved will be omitted from this log, such as:

- Name(s)
- Address(s) – (physical and electronic)
- Telephone number(s)
- Social security number

Enter the date the incident occurred (Day, Month, Year)

Enter the time (or approximate time) that the incident occurred, a.m./p.m.

Location(s) of Incident	Workplace Violence Type (Indicate which type(s) (Type 1, 2,3,4)
Enter the location(s) where the incident occurred	Enter the workplace violence type(s)

Check which of the following describes the type(s) of incident and explain in detail:

**Note:** It's important to understand that "Workplace Violence Type" and "Type of Incident" have separate requirements. **For this part of the log, "Type of Incident" specifically refers to the nature or characteristics of the incident being logged.** It does not refer to the type of workplace violence.

- 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.

Explain: Provide a detailed description of the incident and any additional information on the violence incident type and what it included. Continue on a separate sheet of paper if necessary.

Workplace violence committed by: For confidentiality, only include the classification of who committed the violence, including whether the perpetrator was a client or customer, family or friend of a client or customer, stranger with criminal intent, coworker, supervisor or manager, partner or spouse, parent or relative, or another perpetrator.

Circumstances at the time of the incident: Write/type what was happening 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.

Where the incident occurred: Where the incident occurred, such as in the workplace, parking lot, or other area outside the workplace.

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 any other hazards identified due to the incident.



Include information on the consequences of the incident.

Were there any injuries? Yes or No. Please explain:

Indicate here if there were any injuries. If so, provide a description of the injuries.

Were emergency medical responders other than law enforcement contacted, such as a Fire Department, Paramedics, or On-site First-aid certified personnel? Yes or No. If yes, explain below:

Did the severity of the injuries require reporting to Cal/OSHA? If yes, document the date and time this was done, along with the name of the Cal/OSHA representative contacted.

A copy of this violent incident log needs to be provided to the employer. Indicate when it was provided and to whom.



This violent incident log was completed by:

\_\_\_\_\_

Name (person completing this log)

\_\_\_\_\_

Job Title

\_\_\_\_\_

Signature (person completing this log)

\_\_\_\_\_

Date