WORKPLACE VIOLENCE PREVENTION PROGRAM

Our establishment's 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: July 1, 2024
Date of Last Revision(s): July 1, 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 required by LC section 6401.9.

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

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

Threat of violence - Any verbal or written statement, including, but not limited to, texts, electronic messages, social media messages, or other online posts, or any behavioral or physical conduct, that conveys an intent, or that is reasonably perceived to convey an intent, to cause physical harm or to place someone in fear of physical harm, and that serves no legitimate purpose.

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

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

- The threat or use of physical force against an employee that results in, or has a high likelihood of resulting in, injury, psychological trauma, or stress, regardless of whether the employee sustains an injury.

- An incident involving a threat or use of a firearm or other dangerous weapon, including the use of common objects as weapons, regardless of whether the employee sustains an injury.

- The following four workplace violence types:

  Type 1 violence - Workplace violence committed by a person who has no legitimate business at the worksite, and includes violent acts by anyone who enters the workplace or approaches employees with the intent to commit a crime.

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

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

_Type 4 violence_ - Workplace violence committed in the workplace by a person who does not work there, but has or is known to have had a personal relationship with an employee.

_Workplace violence_ does not include lawful acts of self-defense or defense of others.

_Work practice controls_ - Procedures and rules which are used to effectively reduce workplace violence hazards

**RESPONSIBILITY**

The WVPP administrator, Executive Director, has the authority and responsibility for implementing the provisions of this plan for Associated Students of San Diego State University (A.S.). If there are multiple persons responsible for the plan, their roles will be clearly described.

<table>
<thead>
<tr>
<th>Responsible Persons</th>
<th>Job Title/Position</th>
<th>WVPP Responsibility(ies)</th>
<th>Phone #</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>Christina Brown</td>
<td>Executive Director</td>
<td>Overall responsibility for the plan</td>
<td>619-594-6903</td>
<td><a href="mailto:cbrown4@sdsu.edu">cbrown4@sdsu.edu</a></td>
</tr>
<tr>
<td>Patty Rea</td>
<td>Associate Executive Director</td>
<td>Responsible for emergency response, hazard identification, and coordination with other employers</td>
<td>619-594-3243 Cell: 619-504-4587</td>
<td><a href="mailto:prea@sdsu.edu">prea@sdsu.edu</a></td>
</tr>
<tr>
<td>Raven Tyson</td>
<td>Associate Director of Business Operations</td>
<td>Responsible for employee involvement and training</td>
<td>619-594-3760 Cell: 619-316-1320</td>
<td><a href="mailto:rtyson@sdsu.edu">rtyson@sdsu.edu</a></td>
</tr>
</tbody>
</table>

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

**EMPLOYEE ACTIVE INVOLVEMENT**

A.S. ensures the following policies and procedures to obtain the active involvement of employees in developing and implementing the plan:

- Area Directors will work with and allow employees to participate in:
  - Departmental safety meetings to discuss identification of workplace violence related concerns/hazards, evaluate those hazards and/or concerns, and how to correct them. These meetings may include discussions of recent incidents and reviews of safety procedures
  - Ensuring training of part-time employees; providing suggestions for training
  - Reporting workplace violence incidents to their Area Director and/or Human Resources

- Human Resources 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

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

- Training employees, supervisors, and managers in the provisions of A.S.’ Workplace Violence Prevention Plan (WVPP) upon hire
- Effective procedures to ensure that supervisory and nonsupervisory employees comply with the WVPP to include:
  - Continued training, communication, monitoring of incidents, and addressing areas of concern as needed
- 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 at departmental staff meetings, Safety Committee, A.S. newsletter and performance awards
- Discipline employees for failure to comply with the WVPP. Any violation of the WVPP policies and procedures will be addressed by the employee’s supervisor in coordination with Human Resources

COMMUNICATION WITH EMPLOYEES

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

- New employee orientation includes workplace violence prevention policies and procedures
- Workplace violence prevention training programs
- Regularly scheduled meetings that address security issues and potential workplace violence hazards
- Effective communication between employees and supervisors about workplace violence prevention and violence concerns
- Posted or distributed workplace violence prevention information
- Employees can report a violent incident, threat, or otherwise workplace violence concern to University Police Department (911), their supervisor or to Human Resources at ashrdept@sdsu.edu without fear of reprisal or adverse action
- Employees will not be prevented from accessing their mobile or other communication devices to seek emergency assistance, assess the safety of a situation, or communicate with a person to verify their safety
- Employees’ concerns will be investigated in a timely manner and they will be informed of the results of the investigation and any corrective actions to be taken depending on the circumstances and nature of the investigation
- Depending on the circumstances, updates during daily/weekly/monthly/quarterly meetings with other employers in the building (at or near and around the same worksite) to discuss the plan and any updates.
- As needed communicating incident reports with other employers to ensure a coordinated response to any incidents
COORDINATION WITH OTHER EMPLOYERS

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

- A.S. shall ensure vendors train their employees on workplace violence prevention
- A.S. will communicate to campus partners and vendors that should any of their employee’s experience workplace violence incident(s) that impacts A.S., they report it to A.S. Human Resources and record the information in a violent incident log

WORKPLACE VIOLENCE INCIDENT REPORTING PROCEDURE

A.S. will implement the following effective procedures to ensure that:

- All threats or acts of workplace violence are reported to the employee’s supervisor or Area Director, who will inform the WVPP administrator. Employees may also report incidents directly to Christina Brown, Executive Director, or Patty Rea, Associate Executive Director
- Employees may anonymously email ashrdept@sdsu.edu
- Employees may complete the online Workplace Violence Incident Form: [Insert Workplace Violence Incident Form weblink] or the paper Workplace Violence Incidents forms

A strict non-retaliation policy is in place, and any instances of retaliation are dealt with swiftly and decisively. An employee who retaliates against a coworker for reporting an incident may be disciplined and/or terminated.

EMERGENCY RESPONSE PROCEDURES

A.S. has the following specific measures to address actual and/or potential workplace violence emergencies:

- Effective means to alert employees of the presence, location, and nature of workplace violence emergencies by the following:
  - Alarm systems (The alarms could be audible alarms, visual alarms, or both.)
  - Cell phone communication
  - Email communication
- San Diego State Emergency Notification System is used to reach the campus community – students, faculty, and staff – during an emergency situation. Outdoor sirens, loud speakers, phone and desktop alerts are some components of the SDSU emergency notification system
- SDSU Phone Alerts and SDSU Desktop Alerts require registration at https://urgent.sdsu.edu/sdsu-alert-platform. Employees are encouraged to sign up for SDSU Alters and download the SDSU Safe app
- A.S. maintains evacuation or sheltering plans in the Emergency Action Plan. Evacuation and sheltering plans may vary depending on the nature of the incident and the department location. All departments have posted maps of emergency exits
  - In the event that evacuation or sheltering is required, employees should follow the directions of their departmental safety representatives and/or responding staff

In the event of an emergency, including a Workplace Violence Emergency, contact the following:
<table>
<thead>
<tr>
<th>Responsible Persons</th>
<th>Job Title/Position</th>
<th>WVPP Responsibility(ies)</th>
<th>Phone #</th>
<th>Email &amp; Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>University Police Department</td>
<td>Chief of Police</td>
<td>Responsible for emergency response</td>
<td></td>
<td><a href="mailto:police@sdsu.edu">police@sdsu.edu</a></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Located across the street from the Aztec Recreation Center, next to Peterson Gym</td>
</tr>
<tr>
<td>Christina Brown</td>
<td>Executive Director</td>
<td>Overall responsibility for the plan</td>
<td>619-594-6903</td>
<td><a href="mailto:cbrown4@sdsu.edu">cbrown4@sdsu.edu</a></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>A.S. Office, third floor of the Aztec Student Union</td>
</tr>
<tr>
<td>Patty Rea</td>
<td>Associate Executive Director</td>
<td>Responsible for emergency response, hazard identification, and coordination with other employers</td>
<td>619-594-3243, Cell: 619-504-4587</td>
<td><a href="mailto:prea@sdsu.edu">prea@sdsu.edu</a></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>A.S. Office, third floor of the Aztec Student Union</td>
</tr>
</tbody>
</table>

**WORKPLACE VIOLENCE HAZARD IDENTIFICATION AND EVALUATION**

The following policies and procedures are established and required to be conducted by A.S. to ensure that workplace violence hazards are identified and evaluated:
WORKPLACE VIOLENCE HAZARD IDENTIFICATION

Campus-wide Potential Workplace Violence Identification
- Active shooter potential
- Public university and open campus allow access to members of general public who may or may not have a reason to visit
- Close proximity to public transportation that provides direct access to the campus at large

Universal A.S. Potential for Workplace Violence Identification
- General public has access to the department main entrance (except Viejas Arena)
- Point of sale and/or check/cash deposit locations in A.S. facilities increase the potential for theft
- Physical altercations involving the general public in A.S. facilities (students, guests, vendors)
- Use of outside vendors and other employers to conduct business in A.S. facilities allow individuals with unknown backgrounds and motivations into A.S. facilities

Aztec Recreation (including all programs and facilities except MBAC) Workplace Violence Identification
- Potential for violence during games on the courts and fields, as well as in fitness spaces, between members or toward staff
- Membership desk does not have a barrier/shield to provide protection between them and the public
- Potential theft of expensive equipment and/or damage
- Early and closing staff arrive early and/or leave late when it may be dark outside and there is potential for violence during these times
- Potential for altercations between spectators at swim/diving events
- Potential for altercations between guests and/or involving staff during private/rental events
- Working at a location where the employee is the only one on duty individual

Aztec Student Union Workplace Violence Identification
- General public has access to the A.S. Office during business hours and does not have a barrier/shield to provide protection between them and the public
- Potential for the general public to follow employees into the A.S. Office from the key access door locations without knowledge
- Paychecks and reimbursement checks are held at the A.S. Office front desk for pick up during business hours
- Student Organizations deposit cash with accounting department staff and count cash in an open space
- The University Information Center does not have a protective barrier/shield between staff and public. There is a roll up metal door in place but it is not fast enough to close in a dangerous situation
- Potential theft of expensive equipment and/or damage
- The Backdoor Studio entrance doors open directly to the public (Ring camera in place)
- Early and closing staff arrive early and/or leave late when it may be dark outside and there is potential for violence during these times
- Aztec Lanes activities include items that may be used as a weapon, such as pool cues, bowling balls, etc.
- Loading dock doors remain open during operational hours and provide direct access to the basement
- The Student Union cannot be completely locked down and therefore can provide places for non-campus community to sleep or camp out overnight
- Students unlock and lock exterior furniture daily and can encounter people camped out at these locations who do not want to move or be disturbed
- The Student Union hosts late night and early morning programming and parking for employees is not immediately next to the Student Union
- University Information Center houses the University Lost and Found which could lead to an argument about lost or found items
- Oggil’s restaurant sells alcohol and could potentially lead to issues with persons who may have had too much to drink
- Aztec Lanes has weekly armored truck monetary pickups that could lead to criminal acts
- The majority of doors within the Student Union are programmed through an electronic system and cannot be immediately locked with a key in an emergency
- The A.S. Food Pantry distributes food to the SDSU community and there is a potential for someone to steal food who is not part of the SDSU community
- The gender inclusive restrooms on the first floor near Starbucks are lockable and therefore can create a dangerous situation for staff and visitors
- The Student Union is generally considered a prime location for activism and could create a dangerous environment during a rally or protest

Children's Center
- Potential for violence between children (i.e., biting, hitting, shoving, etc.)
- Potential for violent conduct from a child toward a staff member (i.e., biting, hitting, kicking, etc.)
- Potential access by the general public into Memory Park from the backside of the fence
- Potential custody issues occurring during child pick up and/or drop off
- Kitchen has access to knives and other sharp objects that could be used as potential weapons
- Proximity to residential housing and their potential for noise and unlawful acts towards the building (lost animals coming onto property, loud parties.)

Viejas Arena/OAT
- General public has many access points to facility(ies) during events
- Ticket Office engages in point-of-sale transactions which increases the potential for theft
- Intoxicated patrons at events could have potential for violence involving other patrons and/or staff
- Potential for violence between fans at games and/or events
- Potential for protests at events and/or because of events
- Event disruptions
- Potential for mass casualty incidents (active shooter, bomb threats, explosives, vehicle born incidents)
- Necessary evictions may lead to violence
- Individuals under the influence (drugs/alcohol/etc.)
- Domestic violence at events

Mission Bay Aquatic Center
- Location of MBAC on city property provides access points to its facility by the general public
- General public has shared access to the parking lot
- General public has shared access to the dock
- Potential custody issues occurring during child pick up and/or drop off
- Limited parking in lot, may require staff to park on the street which increasing potential risk of violence walking to/from their vehicle
- Point of sale transactions which increases the potential for theft
- Close contact with parents who may become upset about issues related to their children’s experience
- Overlap of program use and people living in the park/parking lot
- Location of facility in the beach area near bars and other alcohol related activities
- High transient population/drug use in areas surrounding the facility
- Membership program allows for regular close contact with unscreened, unvetted customers
- Young, college-aged staff demographics that socialize, date, and break up frequently
- Territorial issues related to water/park use amongst various user groups
- Young attractive staff in a fun, welcoming and friendly environment can be misconstrued by the wrong people
- Early opening and late closing hours with low staffing levels
- Multiple unmonitored access points

THE THREAT CYCLE

The “Threat Cycle” model: Non-criminally motivated WPV events are the last part of a cycle that can take months or years to run and follow a pattern of increasingly serious behaviors over time. This is known as “The Threat Cycle” model. While there is no guaranteed predictor of Workplace Violence, applying the Threat Cycle model to observed behaviors can be beneficial in recognizing a higher level of risk for WPV from an individual, serve as an effective form of due diligence, and can help determine which actions to take to mitigate the threat.

Those who interact with someone that may be moving along the Threat Cycle often know of the behaviors, but don't always recognize them as a worsening pattern of behaviors that may lead to a violent event. It is therefore
important for A.S. employees to be trained on these behaviors and to utilize the reporting pathway should they be observed. The Threat Cycle is generally progressive over time. However, any of the behaviors along the cycle can be observed at any time, without the earlier behaviors having been observed. It is important to remember that someone who is somewhere along this cycle is not necessarily going to engage in Workplace Violence.

All A.S. employees are encouraged to report any behaviors they see that cause concern to their supervisor, Human Resources, up to and including the Executive Director and/or the University Police Department.

The Threat Cycle begins with Behaviors of Concern, moves to Behaviors of Heightened Concern, and finally to Behaviors of Imminent Concern where an act of Workplace Violence is likely.

**Stage 1: Behaviors of Concern**
The cycle begins with sudden changes in behavior which are different from how the person normally behaves. As colleagues and friends, we tend to be familiar with someone’s normal behaviors and can generally recognize
sudden changes. Examples of such behavioral changes may include:
- Sudden attendance problems/issues when no such issues existed before
- Complaints and concerns raised by co-workers when no such issues existed before
- A rapid decrease in productivity from formerly productive employees
- Inconsistent work patterns (for example erratic attendance, inconsistent quality of output, unpredictable behavior)
- Poor health and hygiene. Particularly concerning if declining over time
- Sudden personality changes
- Expressions of despair, such as frequent and uncontrollable crying

Such behaviors are not necessarily indicative of violence. They may be caused by life-events such as bereavement or illness and those potential reasons should be noted. However, they should also be considered as Behaviors of Concern because significant life events can be catalysts for WPV events.

Another behavior of concern is the increased expression of desperation or despair. This may include expressions of frustration regarding financial pressures or other external issues such as lawsuits, relationships, or work-related pressures. While such behavior is often normal, sudden, and increasing expressions of anxiety over them, including emotional outbursts, combined with other sudden changes in behavior represent Behaviors of Concern.

Stage 2: Behaviors of Heightened Concern
Further along the Threat Cycle, behaviors can be observed which are fixated upon a specific topic, issue, or person rather than in expressions of generalized distress. They are of particular concern if preceded by Behaviors of Concern, or if they appear suddenly. Examples include:
- Fixation with weapons or violent themes. Repetitive talking about weapons, collecting weapons, weapons handling skills, repeated descriptions of violent scenes in video games or movies, ideological fixation on weapons issues.
- Evidence of possible drug or alcohol abuse. Showing up at work intoxicated, slurred speech, poor coordination, or being caught consuming alcohol or drugs at work. Political or ideological fixation that triggers outrage and inappropriate emotional outbursts, often with an inability to discuss anything else.
- Fixation on another employee, supervisor, or manager. This could be of a romantic, sexual, resentful, or accusatory nature.
- Acting out physically and emotionally. Slamming doors, smashing fists on desks, road rage and emotional outbursts that are both inappropriate for the workplace and disproportionate to the event which caused them.
- Expressions of a desire for self-harm or harm to others. These are veiled threats, indirect threats, non-verbal threats, and conditional threats as outlined in the "Threats" section of this document.
- Attempts to gain access or proximity into systems they are not authorized to access nor needed in their role, and if fixated on an individual, attempts to gain proximity to that person. For example, requesting to be scheduled with that person or asking for private information about that person. This behavior may be considered the probing of pathways or even rehearsing for an act of violence later.

If any Heightened Concern behaviors are observed with an individual, WPV protocols must be activated as outlined in the Protocols section of this document. Such behaviors represent a higher level of threat associated with potential Workplace Violence.

Stage 3: Behaviors of Imminent Concern
"Imminent behavior" refers to situations where there is a clear and immediate risk of violence occurring in the workplace. These threats are serious, specific, and credible, indicating that an individual has the intent and capability to carry out violent actions immediately. These behaviors are considered the final stage of the threat cycle. The primary behaviors are:
- The issuance of a direct threat. This can be done verbally, observed on social media, or through telecommunications tools such as texts or emails.
- "Grand Statements". These are long statements, usually written or recorded, of a highly political or idealistic nature and are often delivered with a tone of finality. They are sometimes referred to as a "manifesto", and include rationalizations for acts that are about to take place, name specific people, and
may indicate suicidal ideation. They can be posted to social media, delivered via email, or handwritten. “Grand Statements” may also be the source of the direct threat.

- End of Life planning. Statements, behaviors, and direct actions which indicate that the subject is getting their affairs in order. This is most frequently observed by family members. Such behaviors can include giving away all of their money, unexpectedly emotional goodbyes, giving up pets, and giving away valuable possessions.
- Brandishing a weapon or brandishing an everyday object as a weapon. Some events of Workplace violence are not planned in advance, but occur in moments of anger. If someone is brandishing a weapon the event is occurring. For crimes in progress, call University Police at 9-1-1

ACTIVE SHOOTER EVENTS

An “Active Shooter” is a person actively engaged in attempting to cause the death of people in a confined area. The Congressional Research Service of the United States defines an active shooter event as an act of gun violence which involves three or more victims.

Active Shooter events are distinct from criminally motivated shootings such as robbery. Active shooters intend to cause the death of people and do so for a variety of reasons including but not limited to: ideological radicalism, revenge for perceived injustices, as a high-profile suicide, or as a combination thereof. Active Shooters target places where people are gathered in larger numbers such as schools, malls, concerts, workplaces, and public events.

Because active shooter situations are often over within minutes, before law enforcement arrives, A.S. employees must be prepared both mentally and physically to deal with an active shooter situation. In alignment with both the CSU system, and with SDSU, A.S. uses the “Run-Hide-Fight” approach to Active Shooter response and training. The basic principle of RUN-HIDE-FIGHT is as follows:

RUN if you can. HIDE if you can’t RUN. FIGHT if you can’t HIDE. The sequence may not be linear. For example, you may have to HIDE before you can RUN. It is good practice to consider each of your options for RUN, HIDE and FIGHT as you go through your daily routine so that on the remote chance such an event unfolds, you are better prepared. For example, familiarize yourself with several possible escape routes from your work area.

Phase 1: Run
When an active shooter event starts, it is likely that you will hear it before you see it. If you hear gunshots, do not attempt to investigate. Move away from the direction of the sound. Active shooters have been known to activate fire alarms during attacks, because these alarms will funnel people into specific areas. DO NOT activate or respond to fire alarms during an active shooter event.

The basics of RUN are as follows:

- Have an escape route and plan in mind. Always be mindful of where the exits are and familiarize yourself with them as part of your daily routine.
- Do not hesitate to break windows or cause other building damage if necessary to escape.
- Leave your belongings.
- Don’t seek consensus. Evacuate regardless of whether others agree to do the same. It is not a group decision.
- Help others escape, but only if they are not incapacitated, and it is safe to do so.
- If you can, and only if it is safe to do so, prevent others from entering the area where the shooter may be.
- Although it may seem counter intuitive, do not attempt to help unresponsive or deceased individuals.
- Always keep your hands visible and empty. Police may already have responded but may not know who the shooter is. You may be mistaken for the shooter if you have something in your hands.
- Exit the building or area, call 911 only when safe to do so.
- Follow all law enforcement commands. Law enforcement is focused only on stopping the shooter, they will not attend to the injured until that objective is reached.
- “Stay off the X”. If you are in the shooter’s line of sight, running in a zigzag pattern makes it more difficult for them to target you.
Phase 2: Hide
If you cannot run because your escape path is blocked by the shooter, you must HIDE. Hiding has two elements: “Cover” and “Concealment”. Concealment means the shooter cannot see you. Cover means bullets cannot penetrate the barrier you are hiding behind. Your hiding place should:

- Be out of the active shooter’s view. (Concealment)
- Provide ballistic protection if shots are fired in your direction (Cover)
- Not trap you or restrict your options for movement. Try not to huddle with others if possible because this can restrict your movement.
- Give you an advantage to “Fight” if needs be. For example, it contains items which can be used as impromptu weapons, such as fire extinguishers, staplers, and scissors.

Active shooters tend not to waste time attempting to breach barricaded or locked doors. If they encounter a locked door they may move on. Lock the door if you can and barricade it with furniture or other heavy objects. Use door stops or improvise with objects nearby. Block automatic door closers (the long hinge at the top of doors that push doors closed) with belts or electrical cord. It doesn’t have to be perfect, but only provides delay and difficulty to the shooter.

Most importantly, while hiding, silence your cell phone and any other devices that may generate noise, including the vibration feature. A mobile device activating can reveal your presence to the shooter.

Phase 3: Fight
If you cannot run or hide, or if your hiding place has been compromised by the shooter, then only then should you fight. An active shooter has intent to kill and usually expects to die. This is typically not a hostage situation, and negotiation is usually not effective. Often, the only option left is to fight in order to survive. Your life is in imminent danger. You should:

- Attempt to disrupt or disable the shooter
- Act as aggressively as possible. Don’t fight fair
- Improvise weapons. Almost anything can be used as a weapon: fire extinguishers, staplers, pens, chairs, computers, keys etc.
- Disrupt their senses. Fluids, even water, in the eyes can cause visual distortion
- In addition to using a fire extinguisher as a blunt weapon, you can discharge it in their eyes
- If available, bright LED lights can dazzle the field of vision, especially if the room is dark
- Hand sanitizers, spray cleaners, deodorizers, bug spray and similar chemical items can be incapacitating to the shooter
- Remember that regardless of how large or strong a person is, their weak points are as vulnerable as anyone else’s: Eyes, throat, ears, nose, knees, neck, groin, and elbows

Commit yourself to your actions because the shooter has committed to theirs. Don’t second guess yourself. There are no other options.

When Law Enforcement Arrives
Active shooter events are chaotic, and when law enforcement arrives, they may not know who and where the active shooter is. For this reason, it is important to follow all instructions, and refrain from distracting the officer’s attention away from the task of finding the shooter. Additionally, you run a risk of being mistaken for the shooter if you carry objects in your hand or run towards the officers.

You may have colleagues that require medical attention. However, upon arrival Law Enforcement will not attend to the injured or deceased and will only seek the shooter. For these reasons, take the following actions upon the arrival of law enforcement:

- Follow police officer’s instructions
- Do not point or scream
- Immediately raise your hand and spread your fingers, and keep your hands visible at all times.
- Do not attempt to assist injured colleagues. Evacuate immediately.

TEMPORARY RESTRAINING ORDER (TRO) or INJUNCTION

Any A.S. employee who has suffered unlawful violence (i.e., assault, battery, or stalking as prohibited in California
Penal Code 646.9) or a credible threat of violence reasonably likely to be carried out in the workplace (See California Civil Procedure Code 527.8) and is seeking to obtain or has obtained a TRO or injunction, should notify Human Resources and/or the University Police Department.

A.S. understands the sensitivity of this information and will treat it with appropriate discretion and confidentiality. If an employee needs information about obtaining a Workplace Violence TRO or injunction, they must contact University Police Department.

Additionally, SB 553 authorizes any employer, including A.S., whose employee has suffered unlawful violence or a credible threat of violence from any individual that can reasonably be construed to be carried out or to have been carried out at the workplace, to seek a temporary restraining order and an order after hearing on behalf of the employee and other employees at the workplace who are at risk. Employees who do not wish to be named in the TRO can have their names redacted from it.

A.S. reserves the right to request TRO’s against any individual who poses a credible threat to its employees, regardless of the existence of an outside order, and regardless of their employment status with A.S.

**WORKPLACE VIOLENCE HAZARD EVALUATION**

- Inspections shall be conducted when the WVPP plan is first established, after each workplace violence incident, and whenever the employer is made aware of a new or previously unrecognized hazard

- Review all submitted/reported concerns of potential hazards

**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. Inspections shall be conducted in coordination with departmental monthly safety inspections.

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

<table>
<thead>
<tr>
<th>Specific Person Name/Job Title</th>
<th>Area/Department/Specific location</th>
</tr>
</thead>
<tbody>
<tr>
<td>Building Services Coordinator</td>
<td>Aztec Recreation</td>
</tr>
<tr>
<td>Building Services Coordinator</td>
<td>Aztec Student Union</td>
</tr>
<tr>
<td>Aztec Aquaplex Manager</td>
<td>Aztec Aquaplex</td>
</tr>
<tr>
<td>Children’s Center Assistant Director</td>
<td>Children’s Center</td>
</tr>
<tr>
<td>Operations Manager</td>
<td>Mission Bay Aquatic Center</td>
</tr>
<tr>
<td>Building Services Coordinator</td>
<td>Cal Coast Credit Union Open Air Theatre</td>
</tr>
<tr>
<td>Building Services Coordinator</td>
<td>Viejas Arena</td>
</tr>
</tbody>
</table>

The Safety Committee shall conduct quarterly assessments for workplace violence hazards to include:

- 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
- 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 (example: security guards)
• Effectiveness of systems and procedures that warn others of actual or potential workplace violence danger or that summon assistance, e.g., alarms or panic buttons
• The use of work practices such as the "buddy" system for specified emergency events
• How well our establishment's management and employees communicate with each other
• Access to and freedom of movement within the workplace by non-employees, including recently discharged employees or persons with whom one of our employees is having a dispute
• Frequency and severity of employees' reports of threats of physical or verbal abuse by managers, supervisors, or other employees
• Any prior violent acts, threats of physical violence, verbal abuse, property damage or other signs of strain or pressure in the workplace

Monthly 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
• 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 where they can 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
• The availability of employee escape routes

WORKPLACE VIOLENCE HAZARD CORRECTION

Workplace violence hazards will be evaluated and corrected in a timely manner. A.S. 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 address the existing condition

• All corrective actions taken will be documented and dated on the A.S. WVPP Incident Form, in email correspondence and/or in findings reports following investigations (if applicable)

• Corrective measures for workplace violence hazards will be specific to a given work area

• May include, but not limited to, the following:
  o Make the workplace unattractive to robbers by:
    • Improve lighting around and at the workplace
    • Post of signs notifying the public that limited cash is kept on the premises and that cameras are monitoring the facility
    • Utilize security measures, such as cameras and mirrors, to provide information as to what is going on outside and inside the workplace and to dissuade criminal activity
  o Provide workplace violence systems, such as door locks, physical barriers, and emergency alarms
  o Post emergency telephone numbers for law enforcement, fire, and medical services
  o Control, access to, and freedom of movement within, the workplace by non-employees, include recently discharged employees or persons with whom an employee is having a dispute
  o Install effective systems to warn others of a violence, danger or to summon assistance, e.g., alarms or panic buttons
  o Ensure employees have access to a telephone with an outside line
  o Provide employee training/re-training(refreshers) on the WVPP, such as:
    • Recognizing and handling threatening or hostile situations that may lead to violent acts by guests and customers within A.S. facilities
    • 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 Human Resources and that the person making the report is not
subject to retaliation by the person making the threat

- Procedures for reporting suspicious persons, activities, and packages
- Provide/review employee, supervisor, and management training on emergency action procedures
  - Ensure adequate employee escape routes
  - Increase awareness by employees of the warning signs of potential workplace violence via training
  - Ensure that employee disciplinary and discharge procedures address the potential for workplace violence. Should the need occur, Human Resources coordinates with the University Police Department
  - A.S. has established policies for prohibited practices such as a no-weapons policy and personal visitors
  - Limit the amount of cash on hand
  - 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 ensuring corrective actions are taken
- Obtain any reports completed by law enforcement

- The violent incident log will be used for every workplace violence incident and will include information, such as:
  - The date, time, and location of the incident
  - The workplace violence type or types involved in the incident
  - A detailed description of the incident
  - A classification of who committed the violence, including whether the perpetrator was a client or customer, family or friend of a client or customer, stranger with criminal intent, coworker, supervisor or manager, partner or spouse, parent or relative, or other perpetrator
  - A classification of circumstances at the time of the incident, including, but not limited to, whether the employee was completing usual job duties, working in poorly lit areas, rushed, working during a low staffing level, isolated or alone, unable to get help or assistance, working in a community setting, or working in an unfamiliar or new location
  - A classification of where the incident occurred, such as in the workplace, parking lot or other area outside the workplace, or other area
The type of incident, including, but not limited to, whether it involved any of the following:

- Physical attack without a weapon, including, but not limited to, biting, choking, grabbing, hair pulling, kicking, punching, slapping, pushing, pulling, scratching, or spitting
- Attack with a weapon or object, including, but not limited to, a firearm, knife, or other object
- Threat of physical force or threat of the use of a weapon or other object
- Sexual assault or threat, including, but not limited to, rape, attempted rape, physical display, or unwanted verbal or physical sexual contact
- Animal attack
- Other

Consequences of the incident, including, but not limited to:

- Whether security or law enforcement was contacted and their response
- Actions taken to protect employees from a continuing threat or from any other hazards identified as a result of the incident
- Information about the person completing the log, including their name, job title, and the date completed

Reviewing all previous incidents

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

TRAINING AND INSTRUCTION

All employees, including managers and supervisors, will have training and instruction on general and job-specific workplace violence practices. These sessions could involve presentations, discussions, online training 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

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

- How to obtain a copy of the A.S. WVPP plan at no cost, and how to participate in plan
- How to report workplace violence incidents or concerns to A.S. or law enforcement without fear of reprisal
- Workplace violence hazards specific to the employees’ jobs, the corrective measures A.S. has implemented, how to seek assistance to prevent or respond to violence, and strategies to avoid physical harm
How to recognize alerts, alarms, or other warnings about emergency conditions and how to use identified escape routes or locations for sheltering

- Employee routes of escape
- Emergency medical care provided in the event of any violent act upon an employee
- Post-event trauma counseling for employees desiring such assistance

**Note:** Employers must use training material appropriate in content and vocabulary to the educational level, literacy, and language of employees.

**EMPLOYEE ACCESS TO THE WRITTEN WVPP**

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

- Whenever an employee requests a copy of the written WVPP, A.S. will provide the requester with a printed copy of the WVPP, unless the employee agrees to receive an electronic copy
- A.S. will provide unobstructed access through a company website, which allows an employee to review, print, and email the current version of the written WVPP

**RECORDKEEPING**

A.S. 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 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 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 A.S. 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 reviewing the plan’s effectiveness:

- Review of the A.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, A.S. 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, Christina Brown, Executive Director of A.S., hereby authorize and ensure, the establishment, implementation, and maintenance of this written workplace violence prevention plan and the documents/forms within this written plan. I am committed to promoting a culture of safety and violence prevention in our workplace and believe that these policies and procedures will help us achieve that goal.

Christina Brown, A.S. Executive Director  
6/27/2024  
Date