Purpose

This document outlines the components of the Carnegie Mellon University's Silicon Valley campus ("CMU-SV") workplace violence prevention plan ("WVPP") in compliance with California's Senate Bill 553.

University resources referred to in this policy are linked in the Related Resources section at the end of this document.

Scope

This WVPP applies to all CMU-SV faculty, staff and student workers.

Definitions   -

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

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

Refer to California Labor Code Section 6401.9 for associated definitions.

Responsibilities

The WVPP administrator, the Senior Director of Operations, has the authority and responsibility for implementing the provisions of this program for the CMU-SV campus location.   The CMU-SV Associate Facilities Manager serves as the backup to the Senior Director and is responsible for maintenance of the violent incident log.

The WVPP administrator is responsible for coordination of investigations of incidents of workplace violence, workplace violence hazard correction procedures, and post incident reporting obligations. The WVVP administrator will coordinate with NASA Emergency Services and NASA OIG special agents for emergency response support, as well as local law enforcement authorities.

Enterprise Risk Management ("ERM") is responsible for the university's Emergency Preparedness and Response Plan.
- Note: While the CMU-SV campus may be covered by sections of the university's plan depending on the emergency and needs, ERM would primarily support the CMU-SV WVPP administrator in instances of workplace violence with post-incident reporting protocol.

The Office of Human Resources is responsible for coordination of annual workplace violence training and ensuring the WVPP is posted in a location(s) to promote employee awareness.

Supervisors are responsible for implementation and maintenance of the WVPP in their respective work areas, answering employee questions about the WVPP, and promptly responding to employee reports of threats or incidents of workplace violence.

Employees are responsible for being familiar with the WVPP and related university policies, completing the required annual training, and reporting hazards or incidents relating to workplace violence.

Compliance

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

- Train employees and supervisors in the provisions of the WVPP.

- Provide retraining to employees whose safety performance is determined to be deficient with the WVPP.

- Recognize employees who demonstrate safe work practices (e.g. reporting unsafe conditions) that promote the WVPP in the workplace. HR's Staff Award and Recognition Programs webpage provides information on employee recognition options available to supervisors.

- Discipline employees for failure to comply with the WVPP in accordance with the Disciplinary Guidelines outlined in Section IV. Staff Relations in the California Staff Handbook.

Refer to the university's Workplace Threats and Violence Policy for more information regarding the university's procedures and internal sanctions for dealing with threats and violence towards members of our campus community.

Note: Employees will not be threatened with adverse action or retaliated against in any way if they refuse to report to or leave a workplace or worksite because they have a reasonable belief that the workplace or worksite is unsafe.

Communication with Employees

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

- New employee orientation includes an overview of workplace violence prevention policies and procedures.

- Workplace violence prevention training program.

- Regularly scheduled staff meetings are used to address security issues and/or potential workplace hazards.

- Effective communication between supervisors and employees about security and violence concerns, including translation where appropriate.

- Posting of workplace violence prevention information with other required workplace postings.

- The university utilizes the CMU-Alert emergency notification system to communicate important information during an emergency and is available to all students, faculty, and staff members.

- 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.

Workplace Violence Incident Reporting Procedure

CMU-SV employees can report a violent incident, threat, or other workplace violence concern to their supervisor, HR Business Partner, or to the WVPP administrator. To report an emergency at the CMU-SV campus, employees should call 911 from a landline or 650-604-5555 from a cell phone. For non-emergencies, employees can call NASA Protective Services at 650-604-5416.

Employees can anonymously file a report with the university's confidential ethics reporting hotline by calling 844-587-0793 or visiting cmu.ethicspoint.com.

Employees can report a violent incident, threat, or other workplace violence concern to employer or law enforcement without fear of reprisal or adverse action. Refer to the university's Policy Against Retaliation.

Emergency Preparedness and Response Procedures

The university maintains an Emergency Preparedness and Response Plan to provide governance, guidelines, and structure for the management of actions and operations needed to address immediate requirements for an emergency incident or planned event.

The goals of the plan are:
- Preserve life and safety of students, faculty and staff;

- Provide concept of operations and direction, control, and coordination of resources needed for incident or event response and stabilization;

- Protect university property, the community, and the environment;

- Manage communications and information regarding incident and event response operations and safety; and

- Provide and analyze information to support decision-making and action plans.

In the event of an emergency at the CMU-SV location, refer to the Carnegie Mellon Silicon Valley emergency information page for who to contact or dial 911.

Workplace Violence Hazard Assessment

To ensure that workplace violence hazards are identified and evaluated, inspections shall be conducted when the plan is first established, after each workplace violence incident, and whenever the CMU-SV WVPP administrator is made aware of a new or previously unrecognized hazard through the reporting procedures described above.

Inspections for workplace violence hazards include, but are not limited, to the following:
- 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 workers have effective escape routes from the workplace.

- Whether doors to offices and rooms can be locked.
- Whether workers have a designated safe area where they can go to in an emergency.

Workplace Security Hazard Correction

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

1. When first observed or discovered.

2. If an imminent hazard exists that cannot be immediately abated without endangering employee(s) and/or property, all exposed employees will be removed from the situation except those necessary to correct the existing condition. Employees necessary to correct the hazardous condition will be provided with the necessary protection.

3. All corrective actions taken and dates they are completed will be documented on the appropriate forms [Violent Incident Log.]

Procedures for Post Incident Response and Investigation

After a workplace incident, the CMU-SV 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.

- o A classification of where the incident occurred, such as in the workplace, parking lot or other area outside the workplace, or other area.

- o 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.

- o 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.

- Encouraging employees who show signs of stress to obtain assistance, such as that offered by the university's [Employee Assistance Program](#).

Training and Instruction

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

- When the WVPP is first established.

- Annually to ensure all employees understand and comply with the plan.

- Whenever a new or previously unrecognized workplace violence hazard has been identified and when changes are made to the plan. The additional training may be limited to addressing the new workplace violence hazard or changes to the plan.

Employee Access to the WVPP

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

This will be accomplished by providing unobstructed access through a company server or website, which allows an employee to review, print, and email the current version of the WVPP. Unobstructed access means that the employee, as part of their regular work duties, predictably and routinely uses the electronic means to communicate with management or co-employees.

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.

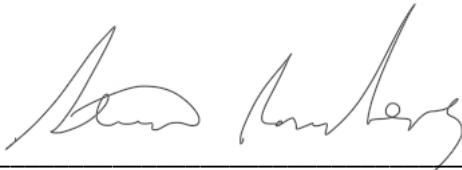* Violent incident logs.

Employee Access to the WVPP

The CMU-SV WVPP, including the violent incident log, will be reviewed for effectiveness:

* At least annually.

* When a deficiency is observed or becomes apparent.

* After a workplace violence incident.

* As needed.

The WVPP is to be updated whenever deficiencies are identified during the review. Employees will be promptly communicated on any changes.

Employee Access to the WVPP

As required by California Code of Regulations (CCR), Title 8, Section 342(a). Reporting Work-Connected Fatalities and Serious Injuries, Carnegie Mellon 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.

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CMU Silicon Valley WVPP Administrator

7-1-2024
Date

Related Resources

HR Business Partner Directory

Carnegie Mellon University in California Staff Handbook[pdf]

Workplace Threats and Violence Policy

Policy Against Retaliation