

SOUTHWESTERN

LAW SCHOOL Los Angeles, CA

Workplace Violence Prevention Plan

Administrative policy approved June 10, 2024. Effective immediately.

Revision history: This policy replaces and expands the information that had been included in the Workplace Violence Prevention Policy.

Related policies: Student Honor Code; Faculty Manual; Employee Handbook; Sexual Misconduct Policy; Policy to Prevent Discrimination, Harassment, and Retaliation; Additional Campus Safety & Security Policies; Record Retention and Disposal Policy

Scheduled Review Date: July 2025 (Administrative Services Office and General Counsel Office)

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A. Background and Scope

Workplace violence is a concern among employers and employees across the country. Southwestern Law School is committed to providing its employees with a safe and secure working environment. Southwestern strictly prohibits actual or threatened violence by or against employees, students, contractors, visitors, and other individuals conducting business with or on behalf of Southwestern (these other individuals are referred to in this Workplace Violence Prevention Plan (WVPP) as "other stakeholders").

California Labor Code (LC) Section 6401.9 requires Southwestern to establish, implement, and maintain an effective workplace violence prevention plan. This WVPP has been developed to protect employees from aggressive and violent behavior in the workplace and addresses the hazards associated with the four types of workplace violence defined in Section B(6). Except as stated in Section D, this WVPP applies to all Southwestern employees and places of employment.

B. Definitions

1. Act of Violence

An “Act of Violence” means any intentional physical aggression, assault, or behavior that results in bodily harm, injury, or damage to oneself, another individual, their property, or school property within the Workplace or in relation to work-related activities. The following are examples of Acts of Violence: hitting, pushing, slapping, kicking, throwing objects, using weapons, engaging in self-harm, and participating in other violent actions that compromise the safety, health, or well-being of Employees, students, contractors, visitors, or other stakeholders. Acts of Violence may also encompass psychological or emotional harm caused by abusive or self-destructive behaviors, such as bullying, harassment, or self-neglect. An individual does not give up the right to use reasonable force or violence to defend themselves or another against a physical attack; the use of reasonable force for self-defense or defense of another does not violate this WVPP.

2. Emergency

Unanticipated circumstances that can be life-threatening or pose a risk of significant injuries to Employees or other people.

3. Employees

“Employees,” for purposes of this WVPP, include full-time and part-time faculty, staff, and Federal Work-Study Students whose job duties require them to work on campus. Students in a clinic for credit are not Employees.

4. 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.

5. Workplace

“Workplace” includes all physical locations and virtual spaces associated with Southwestern's academic, administrative, and residential operations. More specifically, “Workplace” includes, but is not limited to:

- all on-campus buildings, including The Residences, the law library, common areas, and recreational facilities;

- subject to Section D, off-campus locations where Southwestern business, events, meetings, or activities take place, including facilities, conference centers, and other venues that Southwestern rents, leases, or otherwise uses;
- virtual, remote, or online platforms used to conduct Southwestern business, including teleconferencing, videoconferencing, instant messaging, email, the learning management system, and any other official communication channels used by Employees, students, contractors, visitors, and other stakeholders; and
- any location or situation where Employees or other members of the Southwestern community are engaged in work-related activities or are representing Southwestern in an official capacity, whether in person or through digital means (see Section D below for the applicability of this WVPP when an Employee is working for Southwestern at home).

6. Workplace Violence

Workplace Violence is any act or threat of physical, emotional, or psychological harm, aggression, or intimidation that occurs within the context of Southwestern's operations, involving Employees, students, contractors, visitors, or other stakeholders. Workplace Violence can take various forms, including verbal, non-verbal, and physical actions, as well as direct or implied threats that create fear or concern for one's safety or the safety of others. "Workplace Violence" includes Threats of Violence and Acts of Violence as defined in this WVPP.

A non-exhaustive list of Workplace Violence examples includes, but is not limited to:

- threat or use of physical force that results in, or has a high likelihood of resulting in, injury, psychological trauma, or stress, regardless of whether the Employee sustains an injury;
- 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;
- physical assault or battery, such as hitting, slapping, pushing, or kicking a colleague, student, contractor, visitor, or other stakeholder;
- threatening or intimidating behavior, like raising a fist, making aggressive gestures, or displaying a weapon;
- verbal threats or abusive language, including yelling, cursing, or making derogatory remarks about someone's race, gender, religion, or other protected characteristics;
- bullying or harassment, including persistent or repeated behaviors that belittle, humiliate, or undermine a person's sense of dignity or self-worth;
- stalking or following someone in a manner that causes fear or apprehension;

- sexual harassment or assault, including unwanted touching, sexual advances, or inappropriate comments or gestures;
- cyberbullying or online harassment, such as sending threatening emails, posting derogatory messages on social media, or sharing private or embarrassing information without consent;
- damage to property, like vandalism or destruction of personal or school-owned belongings;
- disrupting or interfering with normal work or academic activities, creating a hostile or unsafe environment;
- encouraging or inciting others to engage in violent or aggressive behavior; and
- retaliation against someone who has reported an incident of Workplace Violence, participated in an investigation, or supported a victim.

Workplace Violence includes the following four Workplace Violence types:

Type 1 violence - Workplace Violence committed by a person who has no legitimate business at the Workplace, and Acts of Violence 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 students or visitors.

Type 3 violence - Workplace Violence against an Employee by a present or former Employee.

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.

C. Prohibited Conduct

Employees, students, contractors, visitors, and other stakeholders are prohibited from engaging in threatened or actual Workplace Violence.

D. Working at Home

If an Employee, student, or other stakeholder visits an Employee who is working at home on Southwestern business and an Act or Threat of Violence occurs between those individuals, this WVPP will apply. This WVPP also applies to Employees who commit an act of Workplace Violence while working at home. This WVPP will not otherwise apply to Employees working for Southwestern in their private residence or in a location of the Employee's choice that is not under Southwestern's control.

E. Personal Situations

Personal situations need not be reported to Southwestern unless they pose a risk of violence in the Workplace. Examples of personal situations that could pose a risk of violence in the Workplace and must be reported to the appropriate authority at Southwestern include, but are not limited to, the following:

- incidents or threats of domestic violence against an Employee where it is possible that the threatening party could seek out the Employee at work;
- incidents or threats of domestic or intimate partner violence against an Employee where the threatening party is also an Employee;
- receiving threatening or harassing telephone calls, emails, or other communications while at work;
- unwanted pursuit or threats by an outside party who has been observed at or near the Southwestern campus or any location or situation where Employees or other members of the Southwestern community are engaged in work-related activities or are representing Southwestern in an official capacity, whether in person or through digital means; and
- any situation in which an Employee has obtained a protective or restraining order naming their Workplace as a prohibited area of contact.

Southwestern is committed to supporting victims of intimate partner violence. For non-student Employees, Southwestern will provide a referral to Southwestern's Employee Assistance Program and community resources and, if requested, will provide reasonable time off for reasons related to intimate partner violence. Southwestern will refer Federal Work-Study Students impacted by intimate partner violence to its Title IX Coordinator.

F. Responsibility

The WVPP administrators identified below have the described authority and responsibility for implementing this WVPP for Southwestern.

Responsible Persons	Job Title/Position	WVPP Responsibility(ies)	Email
Darby Dickerson	President and Dean	Overall responsibility for the WVPP; approves the final WVPP and any major changes.	ddickerson@swlaw.edu
Marcie Canal	Chief Operating Officer	Responsible for Employee involvement and training, Emergency response, hazard identification, and coordination with department heads.	mcanal@swlaw.edu
Michael Garcia	Director of Campus Safety and Security	Organizes safety meetings, updates training materials, handles any reports of Workplace Violence, conducts safety inspections, coordinates Emergency response procedures, and communicates with other employers about the WVPP.	mgarcia@swlaw.edu

In addition to the WVPP administrators identified above, all department heads and supervisors are responsible for implementing and maintaining the WVPP in their work areas and answering Employee questions about the WVPP. Moreover, every member of the Southwestern community shares responsibility for creating and maintaining a civil and respectful Workplace free from Workplace Violence

G. Employee Involvement

Southwestern actively included Employees in developing this WVPP by inviting them to review and provide feedback on the WVPP. Employees are included in implementing the WVPP through our Floor Captain program. Floor Captains are Employees who are trained in campus safety procedures. Floor Captains are provided with additional training to conduct Workplace inspections and identify and report Workplace Violence hazards.

The Director of Campus Safety and Security will host annual safety meetings as part of Southwestern’s WVPP training with Employees to identify Workplace Violence concerns and hazards, evaluate those concerns and hazards, and discuss how to correct them. These meetings may include a review of recent incidents, a review of safety procedures, and brainstorming sessions to identify ways to mitigate Workplace Violence and enhance safety. See also Section R for WVPP training.

Employees are encouraged to participate in designing and implementing training programs. For example, an Employee might suggest a new training scenario based on a

recent incident. Employees can work with the Director of Campus Safety and Security to develop and present relevant training to their co-workers. Employees may participate in training programs by assisting the primary trainer and acting as role players or evaluators in scenario-based training.

All Employees will follow this WVPP and assist in maintaining a safe work environment by:

- Reporting known Workplace Violence hazards using the methods outlined in this WVPP;
- Cooperating with Workplace Violence investigations;
- Complying with Workplace Violence hazard correction measures; and
- Completing required WVPP training as prescribed by WVPP administrators.

H. Communication with Employees

WVPP administrators will ensure that all Workplace Violence policies and procedures within this WVPP are clearly communicated and understood by all Employees. Department heads will review the WVPP with their Employees during a department meeting at the beginning of the fall semester or as needed. Department heads will work with WVPP administrators to report, investigate, and correct any WVPP hazards within their respective departments.

Southwestern's system for communicating this WVPP and Workplace Violence matters includes department head meetings, Crisis Response Team meetings, all-staff meetings, and faculty meetings.

Southwestern recognizes that open, two-way communication among department heads, supervisors, faculty, staff, and other employers who have personnel working at Southwestern about Workplace Violence is essential to a safe and productive Workplace. Southwestern uses the following communication efforts to facilitate a continuous flow of Workplace Violence prevention information among department heads, supervisors, faculty, and staff in a form that is readily understandable by all Employees:

- New Employee orientation includes distribution of the WVPP; new Employees will be invited to any upcoming WVPP training.
- WVPP training programs.
- Annual meetings that address security issues and potential Workplace Violence hazards (see Section G above).
- Effective communication between Employees and supervisors about Workplace Violence prevention and concerns, including using the Employee's first language where appropriate.
- Posted or distributed Workplace Violence prevention information.
- Information regarding how Employees can report a Workplace Violence incident,

threat, or other Workplace Violence concern to Southwestern or law enforcement without fear of reprisal or adverse action (see Section J below for reporting examples).

- Investigation of Employees' concerns in a timely manner. Southwestern will inform Employees of the investigation results and any corrective actions to be taken to the extent feasible or allowed.

Depending on the nature of the incident, Southwestern may communicate directly with the affected individuals and/or the entire campus community. Updates on the status of investigations and corrective actions may be made in person, by telephone, or by email. The frequency of updates will depend on the nature of the incident and be given at appropriate intervals.

I. Coordination with Other Employers

Southwestern will coordinate the implementation of this WVPP with other employers who have personnel working at Southwestern (e.g., campus bookstore, food services, and Campus Security), when applicable, to ensure those employers and their personnel understand their roles, as outlined in this WVPP, and that the other employers' personnel are provided WVPP training. Southwestern will implement the following procedures to coordinate the implementation of its WVPP with these other employers.

- All vendors with employees who work full-time or part-time on a regular basis on Southwestern's campus will be invited to Southwestern's WVPP training.
- If an employee of another company is working at Southwestern and experiences Workplace Violence, Southwestern will ensure the incident is reported, investigated, and recorded on the appropriate log. Southwestern will communicate and share information with the vendor regarding the nature of the incident, investigation status, and corrective actions.
- All vendors with employees working at Southwestern will be provided a copy of this WVPP. To avoid doubt, "working at Southwestern" means vendor employees who work full-time or part-time on a regular basis on Southwestern's campus and does not include employees of vendors who provide occasional services (e.g., delivery or repair services).

J. Workplace Violence Incident Reporting Procedures

Southwestern responds to all reports of Workplace Violence. Employees must report Threats of Violence and Acts of Violence as soon as possible. Employees can report an Act of Violence, a Threat of Violence, or other Workplace Violence concerns to Southwestern department heads, direct supervisors, and via the following individuals and organizations:

Michael Garcia, Director of Campus Safety and Security
mgarcia@swlaw.edu | (213) 738-6848

Marcie Canal, Chief Operating Officer
mcanal@swlaw.edu | (213) 738-6847

Campus Security
security@swlaw.edu | (213) 738-5793

Human Resources
HR@swlaw.edu

Los Angeles Police Department
Emergency: 911
Olympic Station (non-Emergency): (213) 382-9102

Employees must report Workplace Violence against Federal Work-Study Students to the Title IX Coordinator, TitleIX@swlaw.edu.

Employees can anonymously report a Workplace Violence incident, threat, or other violence concerns, by calling Southwestern's Anonymous Crime Tip Line (213) 738-5730. Employees may also confidentially report matters to Campus Security, the Administrative Services Office, the Office of the Dean, the Student Services Office, the Student Affairs Office, the Title IX Office, or law enforcement. Reports received by the aforementioned departments will be recorded on a Violence Incident Log Reporting Form and promptly forwarded to the Director of Campus Safety and Security for investigation. Southwestern will maintain the confidentiality of the reporting Employee to the extent allowed by law.

When reporting a Threat of Violence or an Act of Violence, the reporting person should be as specific and detailed as possible by reporting the location, the people involved, the date and time, and the details of what occurred.

The reporting person should not place themselves in peril or attempt to intervene during an incident unless they can do so safely. If a reporting person believes an immediate threat exists to their safety or the safety of another person, the reporting person should call 911 and then report the incident to Campus Security. In most rooms on campus, signs next to the telephone and near the light switch provide the specific location that the reporting person can provide to the police or Campus Security.

If a member of the public, Employee, student, or contractor makes a Threat of Violence via the telephone, e-mail, or other method of communication or makes statements indicating a Threat of Violence in the future, the person receiving this communication must report these incidents immediately to Campus Security, then to their own supervisor.

Any supervisor or administrator who receives a report of a Threat of Violence or Act of Violence must report the matter immediately to Campus Security, who will report the matter to the Chief Operating Officer.

Southwestern will not tolerate any retaliation against any Employee for reporting in good faith Threats of Violence or Acts of Violence, and violators will be subject to discipline. Any Employee who believes they have experienced retaliation due to reporting Workplace Violence should contact Human Resources at hr@swlaw.edu.

K. Emergency Response Procedures

Southwestern responds to real or potential Workplace Violence Emergencies.

Southwestern has procedures for evacuation or sheltering that are appropriate and feasible for the Workplace. Our procedures include evacuating to a designated area or nearest exit; deploying lockdown shades and engaging pin locks; using Run, Hide, Fight techniques; and locking and barricading doors when appropriate.

Southwestern has procedures for Employees to obtain help from staff assigned to respond to Workplace Violence Emergencies. Our procedures include contacting Campus Security, local law enforcement, Human Resources, Floor Captains, etc.

Southwestern has in place the following specific measures to handle actual or potential Workplace Violence Emergencies:

- Uniformed Campus Security guards (armed and unarmed);
- Effective means to alert Employees of the presence, location, and nature of Workplace Violence Emergencies using SW-Alert (text) mass notification system, public address system announcements, email alerts, and two-way radio;
- Evacuation plans, including maps of evacuation routes and locations of Emergency exits; and
- Information placards on obtaining help by calling Campus Security or local law enforcement. Placards provide location information, including building address, floor, and room number, to be provided to first responders.

In the event of an Emergency, including a Workplace Violence Emergency, contact Campus Security at 213-738-5793 or local law enforcement by dialing 9-1-1. Notify the WVPP administrators listed below.

Responsible Persons	Job Title/Position	WVPP Responsibility(ies)	Phone #	Email
Michael Garcia	Director of Campus Safety and Security	Emergency response, hazard identification, and incident investigation.	213-738-6848	mgarcia@swlaw.edu
Marcie Canal	Chief Operating Officer	Coordination with other employers, Risk Management.	213-738-6847	mcanal@swlaw.edu

L. Post-Incident Response and Investigation Procedures

Southwestern will promptly and thoroughly investigate all reports of Threats of Violence, Acts of Violence, or Employee concerns about Workplace Violence. To maintain Workplace safety and the integrity of its investigation, Southwestern may (i) suspend Employees suspected of Workplace Violence, either with or without pay; (ii) require Employees suspected of Workplace Violence to work from home; (iii) prevent access to the Workplace for third parties suspected of Workplace Violence; or (iv) take other steps as needed by the school in its reasonable discretion. If an investigation involves a member of the full-time faculty, Southwestern will follow relevant procedures in the Faculty Manual, as applicable. In appropriate circumstances, Southwestern will inform the reporting person and other Employees having a need to know the results of the investigation and corrective measures taken.

The identities of all involved parties will be maintained as confidentially as possible, with the information being disseminated to those having a need to know to facilitate the investigation (e.g., Campus Security, Human Resources, appropriate administrators, and the General Counsel’s Office) and preventative or corrective action. Southwestern may, however, need to disclose results in appropriate circumstances, for example, to protect individual safety or to meet its obligations under the Clery Act.

After a Workplace Violence incident, the WVPP administrators or their designee will implement the following post-incident procedures as appropriate. The WVPP administrators may involve others in these response and investigation procedures (e.g., Human Resources, Campus Security, police department, etc.).

- Ensure Employees receive timely and appropriate medical treatment;

- Provide notice of workers' compensation eligibility;
- 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;
- Investigate and evaluate the Workplace Violence incident and determine and implement changes needed to reduce Workplace Violence hazards in the Workplace; 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;
- Record the information required in the violent incident log reporting form (see Section O below);
- Review all previous incidents;
- Provide support and resources, such as counseling services through Southwestern's Employee Assistance Program and time off work, if necessary, to affected Employees;
- Report the incident to Southwestern's insurance broker;
- Review the effectiveness of the WVPP and revise the plan if necessary;
- Ensure that 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 Workplace Violence 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; and
- Implement other post-incident procedures as needed.

As required by [California Code of Regulations \(CCR\), Title 8, Section 342\(a\) - Reporting Work-Connected Fatalities and Serious Injuries](#), Southwestern 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. Serious injury or illness means any injury or illness occurring in a place of Southwestern employment or in connection with any Southwestern 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.

M. Compliance and Corrective Actions

All Employees must comply with this WVPP. Southwestern ensures that all Employees comply with the WVPP by (i) training Employees on the provisions of this WVPP; (ii) conducting drills and other exercises; (iii) retraining Employees whose safety performance is deficient with the WVPP; (iv) recognizing Employees who demonstrate safe work practices that promote the WVPP in the Workplace by Shout Outs or memos/emails from their supervisor, department head, or the Dean; and (v) disciplining Employees for failing to comply with the WVPP.

Anyone found to be responsible for a Threat of Violence, an Act of Violence, or other conduct that violates this WVPP will be subject to prompt disciplinary action, which could include termination of employment for Employees and expulsion for students. Southwestern may also ban these individuals from campus and refer them to law enforcement. With respect to full-time faculty, Southwestern will follow relevant procedures in the Faculty Manual with respect to corrective actions taken under this WVPP.

N. Fitness for Duty

All Southwestern Employees must be "fit for duty" at all times. If, after an investigation and a finding that the Employee has engaged in conduct that violates this WVPP, Southwestern does not terminate the Employee, Southwestern may require the Employee to be evaluated by a medical or mental health professional to determine their fitness for duty before returning to work. Southwestern may request that the Employee participate in counseling, either voluntarily or as a condition of continued employment. On occasion, Southwestern may also require a fitness for duty evaluation as part of an investigation.

Any Employee who believes that they may have a problem that could lead to violent behavior is encouraged to use Southwestern's Employee Assistance Program (EAP) or BisonCares for Federal Work-Study Students. For information concerning the EAP, please contact Human Resources.

O. Violent Incident Log Reporting Form

Southwestern will record information for every Workplace Violence incident in a violent

incident log reporting form. The form will include the following information:

- The date, time, and location of the incident (e.g., the physical address of where the Workplace Violence occurred);
- The Workplace Violence type or types involved in the incident;
- A detailed description of the incident;
- Who committed the Workplace Violence, including whether the perpetrator was a student, family or friend of a student, stranger with criminal intent, another Employee, an Employee's partner or spouse, an Employee's parent or relative, or other perpetrator;
- 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;
- Where the incident occurred, such as inside 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 using 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; or
 - Other; and
- 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; and

- Information about the person completing the form, including their name, job title, and completion date.

See the attached Violent Incident Log Reporting Form, available on the Southwestern Portal. The Director of Campus Safety and Security will maintain all completed forms and a log of all reported Workplace Violence incidents.

P. Workplace Violence Hazard Identification and Evaluation

Southwestern identifies and evaluates Workplace Violence hazards (e.g., unauthorized building access, poor lighting, lack of surveillance cameras, inadequate Campus Security staffing, working with unstable people, etc.). Hazards may be general in nature or specific to an individual employee, department, or workspace. We conduct Workplace inspections as needed to identify unsafe conditions and work practices, investigate Employee reports or concerns related to Workplace Violence, and ensure compliance with this WPVV. Except as stated otherwise below, the Director of Campus Safety and Security will be primarily responsible for Workplace Violence hazard identification and evaluation and will maintain all inspection records.

Southwestern will conduct the following procedures to ensure that Workplace Violence hazards are identified and evaluated:

- Conduct inspections in connection with the development of the WVPP, after each Workplace Violence incident, and whenever Southwestern is made aware of a new or previously unrecognized Workplace Violence hazard;
- Review all submitted/reported concerns of potential Workplace Violence hazards;
- Weekly review of all Daily Activity and Incident Reports submitted by Campus Security;
- Review voicemail/email/text messages regarding Workplace Violence hazards;
- Through WVPP training, annually review the different types of Workplace Violence and related reporting procedures with Employees to ensure all Employees know how to participate in WVPP;
- Annually conduct inspections of Workplace Violence hazards to identify unsafe conditions and work practices; these inspections may require assessment for more than one type of Workplace Violence.

These annual inspections will be performed by the following designated personnel in

the following areas of the Workplace:

Specific Person Name/Job Title	Area/Department/Specific location
Marcie Canal, COO	Administrative Services Office
Michael Garcia, Director of Campus Safety and Security	All other departments, with the support of the responsible department head
Frank Acosta, Director of Facilities	Campus facilities, as directed

Annual inspections for Workplace Violence hazards include assessing the following:

- Exterior lighting in parking lots, building entrances and exits, sidewalks, and pathways;
- Exterior landscaping in parking lots, building entrances and exits, sidewalks, and pathways;
- Access control points, including vehicle entrance gates/arms, pedestrian gates, building entry/exit doors, and perimeter fences;
- Security technology, including mass notification systems, access card readers, surveillance cameras, and alarm systems;
- Security Guard staffing and deployment of guards on campus;
- The need for surveillance measures, such as mirrors and cameras;
- Procedures for Employee response during a criminal act, including an armed intruder incident;
- Procedures for reporting suspicious persons, packages, or activities;
- Effective location and functioning of Emergency buttons and alarms;
- Posting Emergency telephone numbers for law enforcement, fire, and medical services;
- Whether Employees have access to a telephone with an outside line;
- Whether Employees have a designated safe area to go to in an Emergency;
- Adequacy of Workplace security systems, such as door locks, badge readers, security windows, and physical barriers;
- Frequency and severity of threatening or hostile situations that may lead to

- violent acts by a member of our campus community, vendor, guest, or visitor;
- Employees' skill in safely handling threatening or hostile incidents involving a member of our campus community, vendor, guest, or visitor;
- Campus Security's ability to safely handle threatening or hostile incidents, including an armed intruder;
- The availability of Employee Emergency exit routes;
- Access to 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; and
- Any prior Acts of Violence, Threats of Violence, verbal abuse, property damage, or other signs of strain or pressure in the Workplace.

Q. Workplace Violence Hazards Correction

Southwestern proactively corrects identified Workplace Violence hazards. Our correction of Workplace Violence hazards is implemented with effective policies or procedures for correcting and mitigating unsafe or unhealthy conditions, work practices, policies, and procedures in a timely manner based on the severity of the hazard.

Southwestern will implement the following procedures to correct identified Workplace Violence hazards:

- Campus Security will promptly respond to an incident where an imminent Workplace Violence hazard exists and take the appropriate action to mitigate the hazard and remove exposed Employees from the situation. Campus Security guards are trained in Emergency procedures and de-escalation techniques. Security guards carry defensive weapons and wear protective equipment in case of an imminent threat of Workplace Violence. Campus Security will contact local law enforcement to request assistance and make a crime report if appropriate.
- Campus Security will document all acts of Workplace Violence on a Violent Incident Log Reporting Form and Security Incident Report.
- Campus Security will investigate non-urgent reports or complaints of Workplace Violence hazards. Campus Security will assess the nature and severity of the hazard and report it to the appropriate department for correction (e.g., the Information Technology Department for surveillance camera issues, the Facilities Department for lighting issues, etc.). Reports will be made using the ITHelp or CampusHelp email reporting system.
- All corrective actions will be documented and dated on the appropriate forms.

- The Director of Campus Safety and Security, Director of Facilities, and Chief Information Officer will review service requests and take the appropriate corrective measures to mitigate the Workplace Violence hazard. The department head responsible for correcting the hazard will communicate when and what correction has been made.

R. Training and Instruction

Southwestern will provide training on the WVPP to all Employees. These sessions may involve presentations, discussions, and practical exercises. Training and instruction will be provided as follows: (i) when this WVPP is first established; (ii) annually to ensure all Employees understand and comply with the WVPP; and (iii) whenever a new or previously unrecognized Workplace Violence hazard has been identified and when changes are made to the WVPP. The additional training may be limited to addressing the new Workplace Violence hazard or changes to the WVPP.

Southwestern will provide Employees with training consisting of the following elements:

- This WVPP, how to obtain a copy of this WVPP at no cost, and how to participate in the development and implementation of the WVPP;
- The definitions and requirements contained in LC 6401.9;
- How Employees can report Workplace Violence incidents or concerns to Southwestern or law enforcement without fear of reprisal;
- Workplace Violence hazards specific to the Employees' jobs, the corrective measures Southwestern has implemented, how to seek assistance to prevent or respond to Workplace Violence, and strategies to avoid physical harm;
- The violent incident log reporting form described in Section O and how to obtain copies of the following records: (i) records of Workplace Violence hazard identification, evaluation, and correction; (ii) Workplace Violence prevention training records; and (iii) violent incident log reporting forms;
- Opportunities Southwestern has for interactive questions and answers with a person knowledgeable about the WVPP;
- Strategies to avoid or 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; and
 - Ways to defuse hostile or threatening situations;
- How to recognize alerts, alarms, or other warnings about Emergency conditions and

how to use identified escape routes or locations for sheltering;

- Employee routes of escape including Emergency exits; and
- Post-event trauma counseling that is available for Employees desiring such assistance.

S. Employee Access to the Written WVPP

Southwestern will ensure that this WVPP is in writing and available and easily accessible to Employees and representatives of Cal/OSHA at all times by posting this WVPP on the Institutional Policies webpage of its website.

T. Recordkeeping

Southwestern will create and maintain the following:

- Records of Workplace Violence hazard identification, evaluation, and correction; these records will be maintained for a minimum of five years;
- Training records to include the following; these records will be maintained for a minimum of one year:
 - Training dates;
 - Contents or a summary of the training sessions;
 - Names and qualifications of personnel conducting the training; and
 - Names and job titles of all people attending the training sessions;
- Violent incident log reporting forms, which will be maintained for a minimum of five years; and
- Records of Workplace Violence incident investigations; these records will be maintained for a minimum of five years and will not contain “medical information” as defined in subdivision (j) of section 56.05 of the California Civil Code.

The Director of Campus Safety and Security will maintain these records and can be contacted by sending an email to administrativeservices@swlaw.edu for copies or questions.

All records of Workplace Violence hazard identification, evaluation, and correction; training; violent incident log reporting forms; and Workplace Violence incident investigations required by [LC Section 6401.9\(f\)](#) will be made available by Southwestern to Cal/OSHA upon request for examination and copying.

U. Employee Access to Records

Southwestern will make available the following records 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;

- Workplace Violence prevention training records; and
- Violent incident log reporting forms.

V. Review and Revision of the WVPP

Southwestern will review this WVPP for effectiveness and revise it as needed.

Southwestern will review the WVPP (i) at least annually; (ii) when a deficiency is observed or becomes apparent; (iii) after a Workplace Violence incident; and (iv) as otherwise needed (e.g., revisions required by law).

Review and revision of the WVPP will include the procedures listed in Section G above, as well as the following procedures:

- Notice to Employees of the annual WVPP review.
- Review of this WVPP, which will include, but is not limited to: (i) review of incident investigations and the violent incident log reporting forms and (ii) assessment of the effectiveness of security systems, including alarms, Emergency response, and Campus Security.
- Review that (i) Workplace Violence risks are being properly identified, evaluated, and corrected; and (ii) any necessary corrections are being made promptly and communicated to all Employees. These revisions could involve changes to procedures, updates to contact information, and additions to training materials.

Violent Incident Log Reporting Form

Date of Workplace Violence Incident:	Time of Workplace Violence Incident:
Location(s) of Workplace Violence Incident: _____	
Location Type: Inside Workplace <input type="checkbox"/> , Outside Workplace <input type="checkbox"/> , Parking Lot <input type="checkbox"/> , Other <input type="checkbox"/>	Clery report required? Yes <input type="checkbox"/> No <input type="checkbox"/>
Type(s) of Violence: 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/>	Cal/OSHA report required? Yes <input type="checkbox"/> No <input type="checkbox"/>
Type 1 Violence: means <i>Workplace Violence committed by a person who has no legitimate business at the Workplace, and includes Acts of Violence by anyone who enters the Workplace or approaches Employees with the intent to commit a crime.</i>	
Type 2 Violence: means <i>Workplace Violence directed at Employees by students or visitors.</i>	
Type 3 Violence: means <i>Workplace Violence against an Employee by a present or former Employee, supervisor, or department head.</i>	
Type 4 Violence: means <i>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.</i>	
Detailed Description of the Workplace Violence Incident (e.g., physical attack without a weapon, attack with a weapon or object, threat of physical force, or threat of using a weapon or object, sexual assault, animal attack, etc.): _____ _____	
Perpetrator Type (e.g., student, Employee, family, friend, co-worker, stranger, supervisor, etc.): _____	
Circumstances at the Time of the Workplace Violence Incident (e.g., working in a poorly lit area, isolated, unable to get help, working in an unfamiliar location, etc.): _____ _____	
Actions Taken (e.g., steps taken to protect Employees from a continuing threat or from any other Workplace Violence hazards identified as a result of the Workplace Violence incident): _____ _____	
Additional Information/Consequences (e.g., whether law enforcement was contacted and their response): _____ _____	
Southwestern Law School will ensure that individuals' Personally Identifiable Information (PII; information sufficient to allow identification of any person involved in a violent incident, such as a person's name,	

address, electronic mail address, telephone number, or social security number, or other information that, alone or in combination with other publicly available information, reveals the person's identity) and Sensitive Personally Identifiable Information (PII which if lost, compromised, or disclosed without authorization, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual), is not included on this form.

Name and Title of the person completing the form:	Date:
Name and Title of WVPP Administrator reviewing the form:	Date: