

# **OTIS COLLEGE OF ART & DESIGN**

***9045 Lincoln Blvd, Los Angeles, CA 90045***

## **WORKPLACE VIOLENCE PREVENTION PROGRAM (WVPP)**

FOR COMPLIANCE WITH:

CALIFORNIA CODE OF REGULATIONS (CCR),

TITLE 8 GENERAL INDUSTRY SAFETY ORDERS

SECTION 3342

**JULY 2024**

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# OTIS COLLEGE WORKPLACE VIOLENCE PREVENTION PROGRAM

## POLICY

The Otis College of Art & Design Workplace Violence Prevention Plan (WVPP) addresses the hazards associated with the four types of workplace violence as defined by [Labor Code \(LC\) section 6401.9](#).

Dedicated to creating a safe environment for all employees, Otis College ensures the workplace is free from recognized hazards that could cause physical harm, injury, or death. In line with this commitment and in accordance with the California Code of Regulation (CCR), Title 8 General Industry Safety Orders Section 3342, Otis College of Art & Design has established the following Workplace Violence Prevention Program (Policy).

Date of Last Review: **August 1, 2024**

Date of Last Revision(s):

## DEFINITIONS

**Emergency** – An unforeseen event that can be life-threatening or cause serious injuries to employees or others.

**Engineering controls** – A feature or device in the workplace that eliminates a hazard or provides a barrier between the employee and the hazard.

**Log** – The violent incident log required by Labor Code section 6401.9.

**Plan** – The workplace violence prevention plan required by Labor Code section 6401.9.

**Serious injury or illness** – An injury or illness at a workplace inpatient hospitalization (beyond observation or tests), resulting in amputation, eye loss, or permanent severe disfigurement. This excludes injuries, illnesses, or deaths from accidents on public streets or highways unless in a construction zone.

**Threat of violence** – Any verbal or written communication, such as texts, electronic messages, social media posts, or any behavior or physical act that expresses or is perceived to express an intent to cause physical harm or instill fear of harm, with no legitimate purpose.

**Workplace violence** – Any act of violence or threat of violence that occurs in a place of employment. These include acts such as physical force against employees that can result in injury, psychological trauma, or stress, regardless of the outcome. It also covers incidents involving threats or the use of firearms, dangerous weapons, or ordinary objects as weapons, irrespective of the outcome.

**Otis College of Art & Design recognizes that there are four types of workplace violence:**

**Type 1 violence** – Workplace violence committed by a person who has no legitimate business at the worksite (Otis College) and includes violent acts by anyone who enters the Worksite (Otis College premises) 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 or manager.

**Type 4 violence** - Workplace violence committed in the workplace (Otis College) 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.**

**Workplace controls** - Procedures and rules used to effectively reduce workplace violence hazards.

## RESPONSIBILITY

The following administrative positions have the authority and responsibility for implementing the provisions of this plan for Otis College of Art & Design.

Responsible Person	Job Title/Position	WVPP Responsibilities	Phone #	Email
<b>Ankush Mahindra</b>	<b>VP of Finance &amp; Administration</b>	Approves the final plan and any major changes and oversees the plan's implementation. Other responsibilities are as outlined below.	<b>(310) 665-6916</b>	<a href="mailto:amahindra@otis.edu">amahindra@otis.edu</a>
<b>Karen Hill</b>	<b>VP of Human Resource &amp; Development</b>	Coordinating counseling, facilitating communication with management, and helping with administrative tasks as needed. See below for additional responsibilities.	<b>(310) 665-6910</b>	<a href="mailto:khill@otis.edu">khill@otis.edu</a>
<b>Campus Safety Chief/ Lead Supervisor</b>	<b>Campus Safety Chief</b>	Conducts safety inspection in collaboration with operations office, coordinates emergency response procedures, and the rest of the responsibilities are as outlined below	<b>(310) 665-6965</b>	<a href="mailto:campussafety@otis.edu">campussafety@otis.edu</a>
<b>Mohammed Ahmed</b>	<b>Operations Manager (EHS Officer)</b>	Facilitate Training Record Keeping Investigating incidents as outlined in the section below.	<b>(310) 846-2609</b>	<a href="mailto:mahmed@otis.edu">mahmed@otis.edu</a>
<b>Threat Assessment Team</b>	<b>Karen Hill Ankush Mahindra Jason J. Cha James Birks Julie Spencer</b>	Will oversee the identification of workplace violence and physical hazards and will document it in coordination with the Ops manager and campus safety director It also suggests corrective action based on the outcome of the investigation/incident report. .	<b>(310) 665-6910 (310) 665-6916 (310) 665-6967 (310) 665-6968 (424) 207-3763</b>	<a href="mailto:khill@otis.edu">khill@otis.edu</a> <a href="mailto:amahindra@otis.edu">amahindra@otis.edu</a> <a href="mailto:jcha@otis.edu">jcha@otis.edu</a> <a href="mailto:jbirks@otis.edu">jbirks@otis.edu</a> <a href="mailto:jspencer@otis.edu">jspencer@otis.edu</a>

**VP of Finance and Administration:** Is responsible for assessing the effectiveness of the WVPP.

Additional responsibilities of this office are the following:

- Ensuring the effectiveness of the procedures designed to identify and manage workplace violence risks. Implementing these procedures, which include preventing retaliation against individuals who report incidents.
- Develop, interpret, and enforce policies related to Workplace Violence.
- Ensure that reported acts and threats of violence are investigated and documented by the Campus Safety and Security office.
- Ensuring workplace violence prevention training is provided in a timely manner as stated in this WVPP policy.
- Play a crucial role in early intervention and preventing workplace violence incidents, as identified by the Threat Assessment Committee and the workplace violence hazard inspections by the Operations Manager's (EHS officer) office.

**VP of Human Resources and Development:** Is responsible for handling disciplinary actions associated with the WVPP. Additional responsibilities of this office are the following:

- Helping employees affected by workplace violence, such as coordinating counseling services, facilitating communication with management, and helping with administrative tasks as needed.



- Developing, interpreting, and enforcing organizational policies related to workplace violence. Determine recommendations and proper disciplinary action for employees who threaten another employee for reporting workplace violence incidents or concerns.
- Develop or communicate proper disciplinary action for employees who fail to complete training for workplace violence prevention.
- Collaborate with the Operations Manager's (EHS) office to ensure all employees receive workplace violence prevention training.
- Collaborate with the Operations (EHS) Office to ensure the Workplace Violence Incident Log is current and that any serious injuries or fatalities are reported to OSHA and maintained in the OSHA 300A log form in compliance with Title 8 CCR Sections 330(a) and 342.
- Working with relevant stakeholders in supporting risk assessment by identifying individuals or groups at higher risk of workplace violence due to their protected status, identity, or personal experiences.

**Campus Safety Department** – The main responsibility of this office is to employ procedures to ensure Otis College can effectively address, investigate, and mitigate Workplace Violence incidents. In addition, it is responsible for receiving and investigating reports of violence or threats, documenting findings, and advising on appropriate responses. The department is also responsible for communicating with the Otis community to issue prompt emergency alerts with our available emergency communication channels (**LiveSafe/ Omnilert**) with guidelines on how the community

should respond during these specific emergencies in accordance with the college's [Emergency Operational Plan \(EOP\)](#).

**Operations Manager (EHS Officer)** – Main responsibility is to ensure the effectiveness of procedures established to identify and manage reports regarding physical Workplace Violence hazards. Other responsibilities include:

- Maintaining records of workplace violence inspections Log form in coordination with the Human Resources & Development Office and Campus Safety Department.
- Facilitate training programs that cover recognizing signs of potential violence, preventing violent situations, and responding appropriately if faced with one.
- Assisting the Threat Assessment Team in performing necessary assessments, including initial implementation of WVPP, updates for new hazards, and post-incident evaluations.
- Collaborating with the Threat Assessment Team to develop preventative measures, such as reviewing controls, surveillance systems, physical barriers, emergency communications, secure entries/exits, environment assessments, and alarm systems.
- Coordinating with the Human Resources Department to maintain Otis College OSHA 300 A log, in compliance with reporting serious injuries or fatalities under Title 8 CCR Sections 330(a) and 342.
- Work closely with the Threat Assessment Committee to identify workplace violence hazards, mitigate risks, and address them in a timely manner.

**Facilities Management** – The Director of Facilities Management is primarily responsible for implementing corrective actions after workplace violence hazards are identified. These hazards are typically recognized through a workplace violence hazard assessment report or by the Threat Assessment Committee.

**Managers** – All managers at Otis College are responsible for implementing and maintaining the WVPP in their work areas and answering employee questions about the WVPP. In addition, managers have responsibilities to:

- Report all threats or acts of violence to the Otis College Campus Safety Office.
- Encouraging employee participation in Workplace Violence training seminars.
- Regularly discussing workplace security issues with all staff.
- Referring employees who do not comply with workplace security practices to the HR office for counseling.
- Gathering and presenting feedback from the Otis community to improve the WVPP.

**The Threat Assessment Team (TAT)** will oversee the identification of Workplace Violence and physical hazards and will document the outcomes of all such reports in coordination with the Operations and Campus Safety Office.

The Threat Assessment Team (committee) convenes quickly after an incident is reported to decide the next steps and address the issue in a timely manner.

The TAT suggests corrective action based on the outcome of the investigation or incident report.

**Otis Community** – All Otis employees are responsible for using safe work practices, following and implementing the College’s policies and procedures concerning campus safety, and helping maintain a safe work and learning environment. Everyone is encouraged to review materials regarding campus safety and participate in workplace violence prevention training. To ensure all employees follow safety practices and avoid actions that could lead to workplace violence, Otis College will:

- Communicate and provide employees with training related to WVPP.
- Offer training and counseling to employees who do not meet the standards of work practices aimed at improving workplace security.

## **EMPLOYEE ACTIVE INVOLVEMENT**

Otis College of Art & Design ensures the active involvement of employees and authorized employee representatives in developing and implementing the plan through the following policies and procedures:

- Ensure employees and authorized employee representatives have the opportunity to participate in identifying, evaluating, and implementing corrective measures to prevent workplace violence. Additionally, they should be encouraged to contribute improvements to training programs and promptly report any incidents of workplace violence.
- Communicate all policies and procedures within the WVPP to all employees.

- Mandate that all employees adhere to the WVPP and contribute to maintaining a safe work and learning environment.
- Ensure the WVPP addresses all hazards and corrective actions in every work area, operation, and learning environment.
- The **Threat Assessment Team** will review recent incidents by conducting detailed reviews of any recent workplace violence incidents that fall into any of the four defined types of violence and investigate in an attempt to answer the following questions:
  - How did the incident occur?
  - Who was involved?
  - What could have been done to prevent them?

## **EMPLOYEE COMPLIANCE**

All employees, including managers, are required to complete the Workplace Violence Prevention Plan Training, which will be provided via the **Vector LMS platform** on Cornerstone. Once assigned, the training must be completed within the specified time frame.

To promote compliance with the College's WVPP, Otis College strongly encourages managers to recognize staff who exemplify best practices in enhancing workplace security and eliminating hazards. This recognition can be given during staff meetings, emails, or other forms of acknowledgment.

Employees who fail to comply with WVPP requirements, including not completing the training on time, may face disciplinary actions in accordance with Otis College protocol. These actions may include verbal or written warnings, mandatory retraining, or suspension/termination for repeated or severe violations. For more information, please email the Human Resources Department at [humanresources@otis.edu](mailto:humanresources@otis.edu) or phone at **(310) 846-5728**.

## **COMMUNICATION WITH EMPLOYEES**

Otis College acknowledges that effective communication between management, staff, and other employees is essential for maintaining a safe and productive environment. To achieve this, Otis College will employ multiple channels to regularly disseminate workplace violence prevention information in a clear and accessible manner, including:

- During orientation and onboarding for new employees
- Workplace violence prevention training sessions
- Quarterly scheduled Emergency Response Team meetings
- Ensuring the College's WVPP program, incident reporting form, and other relevant documents are available and easily accessible for all employees through Otis's website and dashboard platform.
- Annual threat assessment report related to workplace violence hazards.

## **COORDINATION WITH OTHER EMPLOYERS**

Otis College of Art & Design will ensure all employees are trained in workplace violence prevention and that incidents are reported, investigated, corrected, and documented in a timely manner. The College will coordinate its plan with other employers, as appropriate.

## **WORKPLACE VIOLENCE INCIDENT REPORTING PROCEDURE**

**Immediate Reporting** - Any Otis employee who witnesses or perceives an act or threat of violence on campus must report such incident immediately by dialing **9-1-1** or the Campus Safety & Security Office, located in Academic Wing Building **Room 170**, either in-person or by phone at **310-665-6965**, when safe to do so. Employees can also notify Campus Safety personnel through the College's emergency communications notification app, **LiveSafe**, by activating the **panic button** option that would instantly inform the security personnel of the location of the reporting employee. Additionally, employees are strongly encouraged to report such incidents to their immediate manager via phone, email, or in-person. Furthermore, employees can report workplace violence hazards/ threats by contacting the HR office at **(310) 846-5728** or email at [humanresources@otis.edu](mailto:humanresources@otis.edu). Employees have the option to report incidents anonymously.

**Non-Emergency Reporting** - Employees are strongly encouraged to report threats of violence in non-emergency situations, and they can do so using the [Workplace Violence Incident Report form](#). All Otis Employees have a duty to report any incident that violates the college's established policy. Reporting workplace violence incidents will help the college document the incident as

required by OSHA, promptly address any hazards or issues, and ensure a similar incident doesn't happen again. Additionally, employees can opt to communicate their concerns via their authorized representatives.

**Otis College's WVPP prohibits retaliation against reporting workplace violence. Any threat or act of retaliation may result in disciplinary action according to California law and regulations and within existing disciplinary protocols of the College.**

To encourage reporting and prepare for emergencies, Otis College will:

1. Train employees on the WVPP
2. Post and distribute WVPP information.
3. Communicate with all employees via the Otis Community blast, monthly staff council meetings, and other mass communication modes with employees detailing how to report violence or threats without fear of retaliation.
4. Convene the Threat Assessment Team (committee) quickly after an incident is reported to decide the next steps and address the issue in a timely manner.
5. Communicate with the employees who reported the incident about actions taken to address their concerns.

## **EMERGENCY RESPONSE PROCEDURES**

In the event of a Workplace Violence Emergency, the Otis College Campus Safety Office will communicate and send emergency notifications to the community via the **LiveSafe** and **Omnilert**



emergency notification systems. Depending on the level of emergency, the College's [Emergency Operational Plan \(EOP\)](#) may be activated, and instructions will be followed accordingly as directed by the Incident Commander and the highest authority of the College structure.

**Note: The alert sent via LiveSafe only reaches individuals who have signed up for the app. The app is available for download for both android and IOS devices.**

When possible and appropriate, these emergency alerts will specify the location and nature of workplace violence emergencies, provide safety instruction (i.e., shelter in place/evacuation), guide how to get assistance from the Campus Safety Office and Law enforcement and indicate where to find further information.

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

**Responsible Person:**

**Job Title:** Director of Campus Safety

**WVPP Responsibilities:** Responsible for implementing procedures for addressing, investigating, and mitigating workplace violence at Otis College. Handles reports of violence or threats, documents findings, and advises on responses in coordination with the Operations Office and Threat Assessment Team. It also issues timely emergency alerts via LiveSafe and Omnilert mass notification channels, providing guidelines aligned with the [Emergency Operational Plan \(EOP\)](#) on community response during specific emergencies.

**Phone #:** 310-665-6965

**Email:** [campussafety@otis.edu](mailto:campussafety@otis.edu)

## **WORKPLACE VIOLENCE HAZARD IDENTIFICATION AND EVALUATION**

The following policies and procedures are established and required to be conducted by Otis College of Art & Design to ensure that workplace violence hazards are identified and evaluated:

The **Threat Assessment Team (Committee)** will oversee the identification of Workplace Violence and physical hazards and will document the outcomes of all such reports in coordination with the Operations and Campus Safety Office.

Otis Staff and Faculty must report workplace violence hazards or concerns through the following communication channels without fear of reprisal/retribution:

- Report workplace hazards/ threats using the [workplace violence incident report form](#) or the Faculty/Staff [Incident Reporting Form](#).
- For emergencies, dial **9-1-1** or the Campus Safety & Security Office at **(310) 665-6965** when it is safe to do so.
- Otis employees or their authorized representatives can also report any incident or workplace hazard to their managers, campus safety office, or Human Resources office by phone or email.

HR: E-mail: [humanresources@otis.edu](mailto:humanresources@otis.edu)

Phone: **(310) 846-5728**

Campus Safety: E-mail: [campussafety@otis.edu](mailto:campussafety@otis.edu)

Phone: **(310) 665-6965**

In addition, in coordination with the Operations and Campus Safety Office, the Threat Assessment Team shall conduct an annual review using a [checklist](#) for assessing workplace safety measures.

### **Periodic Inspections**

Otis College's periodic inspections will identify workplace violence hazards, assessing various types as needed. Inspections shall be conducted annually. The Operations office, along with the Campus Safety Chief, will conduct the inspection using the [workplace hazard inspection form](#).

### **WORKPLACE VIOLENCE HAZARD CORRECTION**

The Office of the Director of Facilities Management will oversee the correction of any identified physical hazards that the department can correct with the resources at its disposal. If the correction requirement is out of the department's scope or functions, outside qualified vendors will be involved in correcting the hazard in a timely manner.

The Facilities Management Director will document and date all corrective actions taken in response to physical hazards identified during inspections or reported incidents. These corrective actions will be based on recommendations from the Threat Assessment Team.

All corrective measures for workplace violence hazards shall be specific depending on the work area. This could be enhancing workplace security by improving lighting, installing surveillance cameras, posting safety signs, adding more safety personnel, controlling access to specific areas, and emergency alarms to prevent and respond to workplace violence.

## **PROCEDURES FOR POST-INCIDENT RESPONSE AND INVESTIGATION**

### **The Threat Assessment Team:**

- Will oversee the identification, evaluation, and correction of Workplace Violence hazards and concerns arising from workplace procedures or processes.
- When an employee reports a workplace violence hazard, threat, or incident, the team will convene, review, and document the outcomes and evaluate any new or previously unrecognized hazards identified during routine inspections.
- After an incident, the team representative may visit the scene to evaluate safety concerns. The Campus Safety Chief and Operations Manager will interview the involved employee or their representative and review security footage if necessary to determine the cause and identify security risks. Corrective actions will be taken, and findings will be documented to prevent similar incidents in the future.
- The investigation report will not include any personal identifying details of individuals involved, such as names, addresses, email addresses, phone numbers, or other identifiable information.

## TRAINING

Otis College will provide employees with training on:

- How do you access and participate in the WVPP?
- Reporting workplace violence without fear of reprisal.
- Specific Job-related violence hazards and prevention measures.
- Accessing the violent incident log and related records,
- Lastly, the training will include an interactive questions-and-answer session with the trainees. Additionally, employees who have further questions or need clarification will have the opportunity for one-on-one meetings with the Operations Manager (EHS Officer).

The workplace violence training for employees will be provided via the **Vector LMS** employee training platform. Once assigned, the training must be completed within the specified time frame.

The training will be available for all Otis employees:

- When the Otis WVPP is initially established (beginning July 2024),
- During the new employee orientation and onboarding process and
- When retraining is required.

All training materials will be accessible on the LMS platform for the specified timeframe.

## **EMPLOYEE ACCESS TO THE WRITTEN WVPP & RECORDS**

Otis College of Art & Design will maintain a Workplace Violence Prevention Plan (WVPP) reviewed annually by the Threat Assessment Team. Each new employee will receive a copy of the WVPP plan upon employment. Additional copies of the written WVPP Plan will be made available to all Otis College employees, authorized employee representatives, and CAL/OSHA representatives upon request. In addition, the plan will also be available on Otis's dashboard and official website ([www.otis.edu](http://www.otis.edu)) for easy access.

Upon request, the following records will be made available to employees and their representatives for examination and copying, at no cost, within 15 calendar days:

- Workplace violence hazard identification, evaluation, and correction.
- Training records
- Violence incident logs

## **RECORDKEEPING**

Otis College will maintain records of workplace violence hazard identification, evaluation, and correction for a minimum of five (5) years.

**Operations Manager (EHS Officer)**, in partnership with the Threat Assessment Team, will create and maintain records of Workplace Violence hazard identification and evaluation for a minimum of

three (3) years. The Operations Office will also maintain a copy of violent incident logs and workplace violence investigations for a minimum of five (5) years.

Additionally, in collaboration with HR, it will 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.

**Facilities Management Department** – will create and maintain records of Workplace Violence hazard correction for a minimum of five (5) years.

**Campus Safety Department** – will maintain a copy of violent incident reports and investigations for a minimum of five (5) years.

**Human Resources & Development and Operations Manager (EHS Officer)** – will also maintain a copy of records of workplace violence incident investigations for a minimum of five (5) years. These records shall not contain medical information in accordance with subdivision (j) of section 56.05 of the Civil Code. Additionally, the HR office will also maintain a copy of training records for a minimum of one (1) year.

Otis College will make all records of workplace violence hazard identification, evaluation, correction, training, incident logs, and workplace violence incident investigations available to Cal/OSHA upon request for examination and copying, as required by [LC section 6401.9\(f\)](#).

## **REVIEW AND REVISION OF THE WVPP**

The Otis College Threat Assessment Team will oversee and support the College's WVPP, ensuring that it is reviewed at least annually, after any workplace violence incidents, and as needed to maintain effectiveness. The review will cover incident investigations, the incident log form, security system assessments, and security personnel readiness to address gaps. Annual reviews will ensure timely identification and management of violence risks, with necessary updates and any revisions to the plan communicated to all employees promptly. These revisions may include procedure changes, contact information updates, and additions to training materials.



## EMPLOYER REPORTING RESPONSIBILITIES

As mandated by [CCR Title 8, Section 342\(a\)](#), Otis College of Art & Design will promptly report to Cal/OSHA any serious injury, illness (as defined by [CCR Title 8, Section 330\(h\)](#)), or death – including those resulting from workplace violence – occurring at or related to the workplace.

I, \_\_\_\_\_, of Otis College of Art & Design, 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 ensuring our employees' safety and well-being and believe these policies and procedures will help us achieve that goal.

**X Ankush Mahindra** Digitally signed by Ankush Mahindra  
Date: 2024.09.11 13:06:34 -07'00'

Ankush Mahindra  
VP, Finance & Administration

## **Appendix**

[Workplace Violence Inspection Checklist](#)

[Workplace Safety Inspection Form Final](#)

[Workplace Violence Employee Training Log Form](#)

[Log of Workplace Violence Incidents](#)

[Workplace Violence Incident Report Form](#)