

#### **Injury and Illness Prevention Program (IIPP)**

Responsible Administrator: Safety and Injury Prevention Division

Revised: June 2024

**Summary:** This section outlines the policy and procedures related to the Injury and Illness Prevention Program (IIPP) that is administered through the Environmental Health and Safety (EHS) Department.

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# 1. Program Description

Per the California Code of Regulations, Title 8, Section 3203, UC Irvine has adopted an Injury and Illness Prevention Program (IIPP), which describes specific requirements for program responsibility, compliance, communications, hazard assessment, accident/exposure investigations, hazard correction, training, and recordkeeping. The University of California, Irvine (UC Irvine) complies with Title 8 of the California Code of Regulations, Section 3203 strives to maintain a safe and healthful working environment and has implemented this Injury and Illness Prevention Program (IIPP) for this purpose.

UCI's IIPP is posted on the Environmental Health and Safety website at <a href="www.ehs.uci.edu">www.ehs.uci.edu</a>, under "Safety and Injury Prevention" and under the "How Do I" drop down page. This document is posted for all UCI employees to access at any time.

#### 2. Scope

The University of California, Irvine:

- Provides procedures for identifying and evaluating hazards and unsafe conditions:
- Develops procedures for correcting hazards and unsafe conditions;
- Communicates with employees regarding health and safety matters and how to report hazards;
- Provides employee training programs;
- · Develops compliance strategies;
- Maintains documentation for health and safety programs; and identifies a person or persons with authority and responsibility for implementing the program

#### 3. Responsibilities

#### 3.1 Program Administrator

The ultimate responsibility for providing resources towards the goal of effective policies regarding environmental health and safety issues rests with the Chancellor. General policies, which govern the activities and responsibilities of the Environmental Health and Safety program, are established under the authority of the Chancellor. As designated by the Chancellor, the individual with responsibility for implementing the IIPP is the Executive Director of Environmental Health and Safety (EHS), hereafter referred to as the Program Administrator. The Program Administrator has the authority to implement all provisions of this program. All University employees are responsible for supporting the program and for working safely and maintaining a safe and healthful work environment.

#### 3.2 Environmental Health and Safety (EHS)

- Provides consultation to all levels of UC Irvine staff and faculty regarding program compliance.
- Develops templates to assist Schools, Departments, and Work Units in implementing effective injury and illness prevention programs.
- Consults on issues of hazard identification and evaluation, procedures for correcting unsafe conditions, systems for communicating with employees, regularly scheduled safety meetings, employee training programs, compliance strategies, and recordkeeping.
- Provides centralized monitoring of campus-wide activities in the areas of environmental compliance, biological safety, chemical hygiene, emergency preparedness, fire safety, hazard communication, hazard identification, hazardous materials management, industrial hygiene, occupational safety, sanitation, and safety education and training.
- Maintains centralized environmental and employee exposure monitoring records, allowing employee access to records as directed by law.

# **3.3 Schools and Business Units** - Associate Vice Chancellors, Deans, Directors, Department Chairs, and other managers are responsible for ensuring that:

- Individuals under their management have the authority to implement appropriate health and safety procedures, practices, and programs.
- Areas under their management have adequate funding for health and safety programs, practices, and equipment.
- Areas under their management are in compliance with UC Irvine health and safety practices, policies, and programs.
- A responsible person (Safety Representative), within each work unit under their management is designated to partner with EHS to implement the work unit specific component of the IIPP.

#### **3.3.1 Work Unit** - lowest level group of individuals that:

- Includes at least one of the following:
  - o-Principal Investigator
  - o-Academic Business Officer

- o Director
- Manager/Supervisor
- Unit/Department Head
- Holds periodic meetings where safety is discussed.
- Includes people who work closely and perform similar work activities on a regular basis
- Has unique training needs in order to successfully implement unit specific procedures.

#### 3.4 Supervisors

In partnership with EHS, Supervisors are responsible for implementing the UC Irvine Injury and Illness Prevention Program. Supervisors implement the IIPP through the following actions:

- Identify a Safety Representative (SR). This person may also be the PI or Supervisor.
- Ensure that work unit health and safety practices are communicated and understood through training and other programs.
- Ensure that health and safety practices are consistent throughout the work unit and that work unit specific training is provided.
- Include compliance with health and safety procedures as part of the annual performance evaluation.
- Encourage employees to report safety concerns without fear of reprisal.
- Report injuries promptly to Workers' Compensation.
- Where appropriate, facilitate the implementation of:
  - Hazard Identification Checklist
  - Work unit specific staff training beyond the required EHS safety courses offered.

#### Laboratory Principal Investigators (PIs) / Lab Supervisors

Laboratory Principal Investigators and Laboratory Supervisors must satisfy the list of items on the <u>Principal Investigator's Checklist</u> to implement the IIPP.

#### 3.5 Employee Responsibilities

The Safety on Site (SOS) program has been developed by UC Irvine to ensure that employees implement and follow the Injury and Illness Prevention Program (IIPP). Employees are responsible for following the requirements of the IIPP through the following actions:

- Complete all EHS required training identified by the Safety Training Self-Assessment (STSA) in the <u>UC Learning Center</u>, including Safety Fundamentals, Laboratory Safety Fundamentals, or School of Medicine Annual Training.
- Know who is the designated Safety Representative (SR) for your work unit.
- Participate in all work unit specific training recommended and/or coordinated by your designated SR.
- Ask your SR, supervisor or faculty when concerned about an unknown or hazardous situation or substance.
- Report all unsafe conditions, practices, or equipment to your supervisor, SR, or to campus EHS.

#### 3.6 Safety Representative (SR)

Safety Representatives are responsible for following the requirements of the Injury and Illness Prevention Program through the following actions:

- Complete all EHS required training identified by the STSA in the <u>UC Learning Center</u> every three (3) years and for new employees.
- Complete the work unit specific <u>Hazard Identification Checklist</u> and ensure that identified hazards are corrected and addressed.
- Develop a <u>Standard Operating Procedure (SOP)</u> as necessary.
- Ensure work unit employees take their Safety Training Self-Assessment and take all EHS required training.

Conduct and/or coordinate work unit specific training for all employees in your work unit.

- Maintain written records for work unit specific training using template.
- Conduct work unit inspections. (Recommended)

Qualifications of a Safety Representative:

- Competency in administrative work activities or area of research.
- Ability to communicate safety procedures.
- For SRs in laboratories, a background in chemical, biological, and/or radiological safety issues, where applicable.

#### 3.7 Student Employees

Student employees are responsible for following the requirements of the Injury and Illness Prevention Program through the following actions:

- Ask your supervisor or faculty questions when concerned about an unknown or hazardous situation or substance.
- <u>Report</u> all unsafe conditions, practices, or equipment either to your supervisor or to EHS.
- Keep informed about conditions that may impact your health and safety.

Participate in EHS training programs, as required.

# 4. Program Components

#### Communication

UC Irvine communicates with employees, faculty, and staff in a form readily understandable and accessible to all affected parties on matters pertaining to occupational safety and health, including provisions designed to encourage employees to inform their supervisor or EHS of hazards at the worksite without fear of reprisal. University employees shall not suffer any type of reprimand, discipline, or punishment as a result of reporting a safety hazard or concern. UC Irvine uses various systems and methods to communicate or relay information on these matters, which include:

- Training Programs
- Regularly scheduled safety committee meetings
- Publications including:
  - o EHS Programs Manual
  - UCI Emergency Procedures
- Participation in <u>research compliance panels</u>, and <u>anonymous and confidential hazard</u> reporting

#### Hazard Identification and Evaluation

UC Irvine has procedures for identifying and evaluating workplace hazards, including scheduled periodic inspections to identify unsafe conditions and work practices. EHS conducts periodic inspections of campus buildings and laboratories, including routine radiation safety and biological safety inspections.

Safety Representatives complete Hazard Assessments for their work unit. The following tools are used to identify hazards and unsafe conditions in the work unit:

- Hazard Identification Checklist
- Workstation Ergonomic Evaluations
- Work Unit Inspection Tools
- Laboratory Safety Inspection Checklist
- Self-Inspections for Labs Checklist
- Title 19 Inspection Program

UC Irvine has developed a COVID-19 Prevention Plan (<u>Appendix A - University of California</u>, <u>Irvine COVID-19 Prevention Plan</u>) that addresses all of the elements as set forth in the Cal/OSHA Emergency COVID-19 Prevention Regulation, 8 CCR 3205.

#### **Hazard Correction**

Unsafe or unhealthful work conditions, practices, or procedures are corrected in a timely manner based on the severity of the hazards and available university funds. For serious hazards that are immediately dangerous to life or health, immediate action will be taken to mitigate the hazard. The Supervisor/Principal Investigator, department heads, EHS, and all affected employees will be notified of the hazard. If the hazard cannot be immediately abated, all personnel will be removed from the affected area. Access to the area will be controlled until the safety of personnel can be assured.

#### **Training and Instruction**

Training is provided to each employee, including managers and supervisors, with regard to general safety procedures and to any hazards specific to an employee's job.

All employees must complete required safety training as identified by the STSA in the UC Learning Center. The STSA identifies safety training based upon work environment and work activities. Results may include Safety Fundamentals, Laboratory Safety Fundamentals, or School of Medicine Annual Training. Training occurs:

Upon the hiring of a new employee;

- When an employee is given a new job assignment for which training has not been provided; or
- When new substances, processes, procedures, or equipment that represent a new hazard are introduced.
- When recertification is due.

Training records for all EHS training courses can be found within UC Learning Center.

#### Recordkeeping

The University has taken the following steps to document and maintain the IIPP:

- All IIPP related documents are maintained a minimum of 10 years.
- Employee exposure records are maintained for at least 30 years.

#### 5. Reporting Requirements

When an injury or illness occurs that is serious enough to require immediate medical treatment, notify University Police by calling 911 on a campus phone or (714) 456-6123 at the UC Irvine Medical Center.

**Reporting.** The Online Incident Report must be completed for all employee work-related injuries and illnesses within 24 hours of the incident. For additional information, please refer to the Workers' Compensation website.

**Investigations.** As part of completing the Online Incident Report, the employee and supervisor work together to determine the cause of the incident and to ensure that appropriate follow-up, hazard communication, and hazard correction has occurred. EHS reviews online incident reports. Incident reports and EHS investigations are documented and filed with EHS and Workers' Compensation.

#### Additional Resources:

- Report a Safety Concern
- Report a Work-related Injury or Illness
- Workers' Compensation
- UC Irvine Injuries & Medical Treatment

#### 6. References & Appendices

#### UC Irvine:

Training Schedule and Registration
Report a Safety Concern/Near Miss
Report a Work-related Injury or Illness

#### State Agencies:

<u>California Division of Occupational Safety and Health (Cal/OSHA)</u>
<u>California Environmental Protection Agency</u>
California Air Resources Board

# Appendices:

Appendix A - University of California, Irvine COVID-19 Prevention Plan

Appendix B - Interim UC Workplace Violence Prevention Plan

# Appendix A - University of California, Irvine COVID-19 Prevention Plan

University of California, Irvine COVID-19 Prevention Plan

Revised: March 2024

**Summary:** The University of California, Irvine's COVID Prevention Plan addresses the Cal/OSHA emergency COVID-19 Prevention Regulation, 8CCR 3203.

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#### 1. Identification and correction of COVID-19 hazards

The campus identifies and evaluates COVID-19 hazards and correction of hazards from submitted safety concerns from campus, including COVID-19 related whistleblower complaints. Leadership of these units are notified of hazards and unsafe behaviors and expected to resolve them by communication to unit employees. Repeated COVID-19 safety concerns are elevated to campus Senior Leadership.

Campus units working on campus during the first 16 months of the COVID-19 pandemic have submitted Return to Work plans and completed a Risk Assessment, Protection, and Monitoring Plan. The submitted plan included a physical assessment of the workspace performed by EHS. Non-Research plans were submitted to the Campus Recovery Implementation Team (CRIT) for approval. Research plans were submitted to the Office of Research for approval. Starting July 1, 2021, units are instructed to complete a COVID-19 Prevention Checklist, reviewing all of the information with their staff, and attesting to following COVID-19 control measures, taking COVID-19 Returning to Campus training, COVID-related information contained on the UCI Working Well website, and all current campus Executive Directives.

In addition to following the regulations set forth by Cal/OSHA, UCI frequently consults

other regulatory agencies (i.e., California Department of Public Health (CDPH), Centers for Disease Control (CDC), Orange County Health Care Authority (OCHCA)) for changes and guidance on COVID-19 related information. UCI also references the California State Guidance for Institutes of Higher Education document for additional information.

# 2. Investigation of COVID-19 positive cases, including communication to potentially exposed employees

Investigation of COVID-19 cases at UCI, including giving notice to all exposed employees within one business day to meet compliance with the Cal/OSHA COVID-19 Prevention Non-Emergency Regulations, follows the following process:

Positive or suspected COVID-19 case notifies UCI in one of several methods:

- a. Through the COVID-19 Intake Questionnaire, form available at: <a href="Intake">Intake</a> Questionnaire
- b. By contacting the COVID-19 Response Center at <u>covid19@uci.edu</u> or (949) 824-9918
- c. By notifying their supervisor of their status

Response:

After the form is completed by the employee, notification is sent to Contact Tracing.

EHS assigns the positive case to an EHS representative for investigation, who determines and recommends control measures that should be taken in the workplace. Investigation questions are completed by EHS staff:

Employee Name: Title: Email: Department: Supervisor Name: Supervisor Email: Supervisor Phone:
Essential Worker: Critical worker identified under the department's continuity of operations plan whose work cannot be completed remotely for any duration of their work hours.  O Yes O No Represented Worker O Yes O No
Case Last Day On-Site: Date of Onset: Description of Incident: Potential Route of Exposure: Supervisor

Check all control measures in place:

- Physical Distancing
- Signage
- Communications
- Barrier/Space Assessment
- Training
- Face Covering
- Other

## Covid-19 Returning to

Campus Training Yes

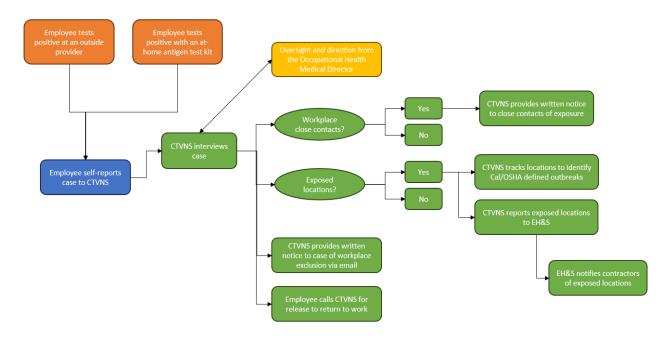
O No

# **EHS** Recommendations

- Physical Distancing
- Signage
- Communications
- Barrier/Space Assessment
- Training
- Face Covering
- Other

UCI Contact Tracing follows the attached flowchart after being notified of a positive COVID-19 case:

UCI COVID-19 Contact Tracing Staff & Faculty Flowchart



Written notification, required from the positive COVID-19 case which resulted in COVID-19 exposed workplace(s), applies to all campus non-healthcare workers including student employees, staff, faculty/academics, and employers of contractors is via daily email if there were previous positive cases. As a result of contact tracing investigations, Contact Tracing provides a list of exposed workplaces to Strategic Communications and maintains records for five years, according to UCOP policy.

Individual employee written notification for anyone who may have had a COVID- 19 exposure applies to all campus employees. Communication is in the form of a written letter to employees deemed as having close contact to a positive COVID-19 case. Contact Tracing will maintain these records for five years based on UCOP policy.

Contract Tracing will use the process above for any employee who tests positive.

#### Contractor/Vendor Communication:

All contractors/vendors are notified via email about all locations where there may be a potential COVID-19 exposure. Contractors are instructed to contact Contact Tracing (contacttracing@uci.edu) or at (949) 824-2300 with the names of any UCI persons who may have been exposed by a contractor with a confirmed COVID-19 positive case. This information will contain the names of the affected individuals, infectious periods, and campus work locations. Contact Tracing will obtain the applicable information and identify any campus locations of potential COVID-19 exposure and these locations are included in the email sent to contractors/vendors.

#### 3. COVID-19 Training

COVID-19 training content has been developed and is available in an online course for UCI campus employees: Returning to Campus Training // Environmental Health & Safety // UCI

Campus employees are required to take this training as directed by Cal/OSHA nonemergency standard for COVID-19.

Returning to Campus COVID-19 training content includes:

- What COVID-19 is, how it spreads and how to identify the symptoms;
- The importance of healthy hygiene practices, including but not limited to hand washing, and routine surface cleaning;
- The fact that particles containing the virus can travel more than six feet, especially indoor, so physical distancing, face coverings, increased ventilation indoors, and respiratory protection decrease the spread of COVID-19 but are most effective when used in combination.;
- Information on face coverings, process on providing respirators, and information on how to obtain a voluntary use respirator, commonly known as

- N95s, how to properly wear and perform a seal check, and that upon request, employees may obtain these around various locations on campus.
- UCI's Working Well program, which helps employees identify potential COVID-19 symptoms on a daily basis and provides guidance on seeking medical care:
- Who to contact in the event of a positive case;
- Websites and additional resources to help keep employees up to date on UCI's policies regarding COVID-19: and
- Supplemental modules for employees working in specific job functions at UCI.

For employees who have taken the COVID-19 Returning to Campus training prior to

June 30, 2021, supplemental information related to COVID-19 protection measures and controls was distributed via the EHS website: <a href="https://ehs.uci.edu/">https://ehs.uci.edu/</a>

#### Aerosol Transmissible Disease Training

Aerosol Transmissible Disease (ATD) training is available to any UCI employee who performs cleaning and disinfecting activities related to COVID-19 control measures. This training is conducted by EHS staff. ATD training and Bloodborne Pathogens (BBP) training is also provided to all Student Health Center employees. This training is conducted by EHS staff and is also available in UC Learning Center.

#### 4. Face Coverings

A "compliant face covering" is defined as a surgical mask, a medical procedure mask, a respirator worn voluntarily, or a tightly woven fabric or non-woven material of at least two layers. Face coverings must not have visible holes or openings and must cover the nose and mouth. Face coverings do not include a scarf, ski mask, balaclava, bandana, turtleneck, collar, or single layer of fabric.

Regardless of vaccination status, UCI continues to provide face coverings and voluntary use respirators to all employees if requested. Voluntary use respirators, commonly known as N95s, are available to all employees upon request. The UCI Logistics Team has stocked face coverings for all UCI employees and EHS and Facilities Management distribute to campus departments, via several campus distribution locations, and as requested. Additionally, HR has created a process to evaluate medical accommodations and provides an alternate face covering that is non-restrictive.

Information on how to obtain a face covering or a voluntary use respirator is provided on EHS' webpage: <u>Face Coverings and Voluntary Use Respirators (N95s) // Environmental Health & Safety // UCI</u>

#### 5. Engineering controls, administrative controls, and PPE

UCI implements COVID-19 control measures that follow the hierarchy of controls: engineering controls, administrative controls, and personal protective equipment (PPE).

Engineering controls currently in place:

- Facilities Management maintains campus buildings with appropriate
  Minimum Efficiency Reporting Value (MERV)-rated filter and maintains
  Heating Ventilation and Air Conditioning (HVAC) systems with the
  appropriate air changes per hour and replaces filters, as necessary.
- Plexiglass partitions and barriers are available upon request as a result of a minor or major outbreak.

Administrative controls currently in place:

- Hazard assessments have been conducted for all cleaning activities.
   Appropriate training and PPE recommendations have been shared with these departments.
- Proper handwashing information is provided to the campus community.
- For positive COVID-19 cases, decontamination is based on the last day the individual was on site and how long the space can be left unoccupied. UCI follows CDC recommendations on disinfection after a space was occupied by a COVID-19 positive individual.

#### PPE controls in place:

 Based on the hazard assessments conducted for cleaning activities, appropriate PPE has been recommended and has been provided to custodial employees. Disposable nitrile gloves and safety glasses are required to be worn when performing cleaning activities.

#### 6. Keep potentially exposed employees away from the workplace

Positive employees are not allowed to return to work based on set criteria from the California Department of Public Health (CDPH).

A COVID-19 positive case may return to work when all of these conditions are met:

- At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications;
- COVID-19 symptoms are mild and improving

#### 7. Multiple and major COVID-19 infections and outbreaks

Definitions (abbreviated and not exclusive):

- "COVID-19 case" is a person who has a confirmed positive case, is subject to an order to isolate, or has died as a result of COVID-19.
- "COVID-19 exposed workplace" is a worksite or work area location the COVID-19 case used or accessed during the high-risk exposure period.
- "COVID-19 exposure" means physical or close contact with a COVID-19

- case (greater than or equal to 15 minutes cumulatively over a 24-hour period).
- "Minor Outbreak" means 3 or more employee cases in an exposed workplace within a 7-day rolling period and continues until there are 0 cases for 14 days. Epidemiology links are now included per CDPH quidance.
- "Major Outbreak" means 20 or more employee cases in an exposed workplace within a 30-day period and continues until there are 0 cases for 14 days.
- Hazard assessments have been conducted for all cleaning activities.
   Appropriate training and PPE recommendations have been shared with these departments.
- Proper handwashing information is provided to the campus community.
- For positive COVID-19 cases, decontamination is based on the last day the individual was on site and how long the space can be left unoccupied. UCI follows CDC recommendations on disinfection after a space was occupied by a COVID-19 positive individual.

# PPE controls in place:

 Based on the hazard assessments conducted for cleaning activities, appropriate PPE has been recommended and has been provided to custodial employees. Disposable nitrile gloves and safety glasses are required to be worn when performing cleaning activities.

#### 8. Keep potentially exposed employees away from the workplace

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- "Minor Outbreak" means 3 or more employee cases in an exposed workplace within a 7-day rolling period and continues until there are 0 cases for 14 days. Epidemiology links are now included per CDPH guidance.
- "Major Outbreak" means 20 or more employee cases in an exposed workplace within a 30-day period and continues until there are 0 cases for 14 days.

Appendix B - Interim UC Workplace Violence Prevention Plan

# UC Workplace Violence Prevention Plan INTERIM

University of California, Irvine (UCI) 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. 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.

Date of Last Revision(s): n/a

Date of Approval(s): July 1, 2024

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#### **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.
- Inspect A Risk Safety Solutions product utilized to manage workplace violence inspections.
- **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. It does not include lawful acts of self-defense or defense of others. This includes but is not limited to:
  - 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, students, or visitors.
    - Type 3 violence Workplace violence against an employee by a present or former employee, supervisor, or manager.
    - o **Type 4 violence** Workplace violence committed in the workplace by a person who does not work there but has or is known to have had a personal relationship with an employee.
  - Workplace violence does not include lawful acts of self-defense or defense of others.
- Work practice controls Procedures and rules used to effectively reduce workplace violence hazards.

#### **ROLES AND RESPONSIBILITY**

The WVPP administrator has the authority and responsibility for implementing the provisions of this plan for UCI. If there are multiple persons responsible for the plan, their roles will be clearly described.

Responsible Persons	Job Title/Position	WVPP Responsibility(ies)
John Sterritt	Director, Environmental Health and Safety (EHS)	Safety Concerns and implementation of the Injury and Illness Prevention Program

Joe Brothman	Director, Facilities Maintenance	Oversight of UCI Health WVP
Nathan Tabita	EHS and Emergency Management (EM)	Management of UCI Health WVP department
Marcelle Hayashida	Associate Vice Chancellor, Wellness, Health, and Counseling Center	Maintain oversight of WVP admin on the campus side

All managers and supervisors are responsible for implementing and maintaining the WVPP in their work areas, answering employee questions about the WVPP, and working with the building facility manager to conduct workplace inspections via RSS INSPECT.

#### **EMPLOYEE ACTIVE INVOLVEMENT**

UCI will implement the following procedures to obtain the active involvement of employees and authorized employee representatives in:

- Developing and implementing the plan
  - Providing unions the opportunity to review and provide feedback on the WVP plans and training prior to publishing.
- Management will work with and allow employees and authorized employee representatives to participate in:
  - o Identifying, evaluating, and determining corrective measures to prevent workplace violence.
  - Designing and implementing training by:
    - Requesting feedback on the program and provide a link to do so at the end of the annual UCLC training.
    - Providing feedback forms at the conclusion of any in person training conducted by the WVP administrator.
    - Adding a link on the EHS website under the WVP page to provide feedback.
- Reporting and investigating workplace violence incidents.
  - An autogenerated email is sent out to the individual who submitted the incident report and provides a link for feedback on the WVP process.
- Reviewing the plan at least annually or when a deficiency is observed or becomes apparent, and after a workplace violence incident.
  - o A ZotMail will be sent out annually with a link to the WVP plan asking for comments.
  - After a workplace violence incident, the department WVP admin will collaborate with the supervisor to ensure all department employees have an opportunity to review the plan and provide feedback.

#### **EMPLOYEE COMPLIANCE**

Our system ensures that employees adhere to the rules and work practices designed to enhance workplace security and avoid engaging in threats or physical actions that create security hazards for others. This includes, at a minimum:

- Training employees, supervisors, and managers in the provisions of UCI Workplace Violence Prevention Plan (WVPP).
- Providing retraining to employees whose safety performance is deficient with the WVPP.

- Employees are expected to comply in accordance with Section 3 of the <a href="IIPP">IIPP</a> and failure to comply may result in corrective action in accordance with UC policies or applicable collective bargaining agreements.
- Recognizing employees who demonstrate safe work practices that promote the WVPP in the workplace. Refer to Section 3 of the IIPP.
- Management 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.

#### **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 and consists of the following:

- New employee orientation includes information about workplace violence prevention policies and procedures.
- Workplace violence prevention training programs and opportunities.
- Employees can report a workplace violence incident, threat, or other workplace violence concern to UCI or law enforcement without fear of reprisal or adverse action by:
  - Using the WVPP Online Incident Reporting Tool
  - o Phone call/text/voicemail to the WVP admin
  - Call or text 9-1-1 for life-threatening emergencies
  - Report incident to your supervisor/manager
- 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 with autogenerated messages from our Service Now Online Incident Reporting Tool.
  - o Autogenerated message to individual submitting the incident report.
  - Autogenerated message to individual when the incident has been closed out.
- WVP admin will be included on regularly scheduled meetings with the Consultation Team (CT) that address security issues and potential workplace violence hazards.
- Posted or distributed workplace violence prevention information.
- Providing briefings/trainings at different forums across UCI departments.
- WVP admin will notify supervisor if the workplace violence incident has resulted in an injury.
- Managers/supervisors should share the corrective actions identified in the hazard identification and evacuation process outlined in the appropriate section, below.

# **COORDINATION WITH OTHER EMPLOYERS (Contractors)**

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

- All employees will be trained on workplace violence prevention.
- Workplace violence incidents involving any employee are reported, investigated, and recorded.
- At a multiemployer worksite, the other contracted employer will ensure that if their employees
  experience a workplace violence incident, they will notify UCI by contacting the WVP Administrator

who will record the information in a violent incident log and shall also provide a copy of that log to the contracted employer.

#### WORKPLACE VIOLENCE INCIDENT REPORTING PROCEDURES

Acts or threats of workplace violence that are urgent in nature and which threaten the safety of UCI employees or affiliated individuals must be immediately reported to law enforcement by dialing or texting 9-1-1.

- All acts or threats of workplace violence that are non-life threatening or concerns of workplace violence are reported by using the WVP Online Reporting Tool via the EHS website.
- If an injury has resulted from a workplace violence incident, the supervisor or manager must be notified by the WVP Administrator and will be annotated on the workplace violence incident log.

The <u>Whistleblower Protection Policy</u> will be used to manage any instances of retaliation. Information on how to file a retaliation compliant can be located on the <u>UCI Whistleblower website</u> under the Protection from Retaliation section.

#### **EMERGENCY RESPONSE PROCEDURES**

UCI has in place the following specific measures to manage actual or potential workplace violence emergencies:

- In the event of an emergency, in response to an actual or potential workplace violence incident or concern, UCI affiliated can obtain assistance from UCI PD and/or security personnel by:
  - O Dialing or texting 9-1-1.
  - o Activating the nearest **Emergency Blue Light Phone**.
  - Activating a duress/panic alarm, if available in your work area.
- UCI affiliated individuals may be notified of the presence, location, and nature of workplace violence emergencies by one or more of the following:
  - zotALERT mass warning and notification will alert employees of emergencies (This could be in the form of an IPAWS message, SMS/text message, email notification, computer desktop pop-up and/or Alertus beacons).
  - Certain facilities may also be able to broadcast systems/overhead announcement using paging systems.
- If appropriate for the situation or directed to do so, UCI affiliated individuals can evacuate or shelter.
  - Each facility will have evacuation plans posted near every entrance of the facility, stairwells, and near elevators. This evacuation plan signage will indicate accessible exits from the building, surrounding assembly area locations, the evacuation zone identifier for that building, instructions on how to report a life-threatening incident, and a link to additional emergency response procedures such as sheltering in place.

### WORKPLACE VIOLENCE HAZARD IDENTIFICATION AND EVALUATION

The following policies and procedures are established and required to be conducted by UCI 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 employer is made aware of a new or previously unrecognized hazard
using the INSPECT database.

- All departments that have had a workplace violence incident in the last 5 years are deemed a highrisk unit. These units will be inspected by UCIPD and WVP admin on an annual basis and reported through INSPECT.
- Review all submitted/reported concerns of potential hazards submitted via:
  - Online Incident Reporting Tool
  - INSPECT Database
  - Feedback link on the WVP website
  - Reported from a supervisor/manager
  - Phone call/text/voicemail to the WVP admin (non-affiliates only)

Periodic inspections of workplace violence hazards will identify unsafe conditions and work practices. This may require assessment for more than one type of workplace violence. Periodic Inspections shall be conducted as follows:

- Initial inspection for all units once the WVPP is finalized.
- Annual inspection for all high-risk units identified in the chart below.
- After an incident is reported at any workplace location.
- Identification of a new or previously unrecognized hazard.
- At random and at the discretion of the WVP admin to provide a proactive approach to WVP
- Units that have been deemed high-risk, will be assessed using the High-Risk Workplace Violence Unit Inspection Checklist in coordination with UCI PD. The following is a list of the campus high-risk units:

Area/Department/Specific Location
UCI Transportation and Distribution Services
Aldrich Hall
Human Resources
UCI Student Health Services
Facilities Management
Academic Personnel

For any units that are not listed as high-risk, they will be assessed using the General Workplace Violence Unit Inspection Checklist in the INSPECT database. This checklist includes, but is not limited to the following:

- Evaluating the exterior and interior of the workplace for its attractiveness to criminal activity.
- Posting of procedures for reporting suspicious persons or activities.
- Posting of emergency telephone numbers for law enforcement, fire, and medical services.
- Employees' skill in safely managing threatening or hostile service recipients (example: security guards).
- The use of work practices such as the "buddy" system for specified emergency events.
- The availability of employee escape routes.
- 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.

In addition to the items on the general inspection checklist, all units that are identified as high-risk will be required to use the specific High-Risk Workplace Violence Unit Inspection Checklist in INSPECT database that includes, but is not limited to:

- Surveillance measures, such as mirrors and cameras.
- Effective location and functioning of emergency buttons and alarms.
- 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.
- 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.

#### WORKPLACE VIOLENCE HAZARD CORRECTION

Workplace violence hazards will be evaluated and corrected in a timely manner, as appropriate based on the severity of the hazard.

UCI shall take measures to protect employees from **imminent hazards** immediately and shall take measures to protect employees from identified **serious hazards** within seven days of the discovery of the hazard, where there is a realistic possibility that death or serious physical harm could result from the hazard.

When an identified corrective measure cannot be implemented within this period, UCI shall take interim measures to abate the imminent or serious nature of the hazard while completing the permanent control measures.

- If an imminent workplace violence hazard exists that cannot be immediately abated without endangering employee(s), all exposed employee(s) will be removed from the situation except those necessary to correct the existing condition. Employees necessary to correct the hazardous condition will be provided with the necessary protection. This will be determined in coordination with department supervisor, FM, and the WVP Admin.
- All corrective actions taken will be documented and dated on using INSPECT database.
- Corrective measures for workplace violence hazards will be specific and appropriate for the work area.

#### TRAINING

Developed and managed by the University of California Office of the President (UCOP), a WVP training is required to be taken annually. The training will cover the recognition and avoidance of workplace violence, how to report incidents or concerns without fear of retaliation, and how to access available support services. At the end of the standardized WVP training, there will be an option to select your campus and receive more campus specific training on the program. It will also allow you the opportunity to provide feedback upon completion.

#### ANNUAL PLAN REVIEW

The WVPP will undergo a comprehensive annual review to ensure its continued effectiveness and relevance. This review will include an evaluation of all incidents logged during the year, an assessment of the effectiveness of

implemented corrective actions, and an analysis of any new or emerging workplace violence hazards. The review process will involve key stakeholders, including representatives from UCI PD, Behavioral Intervention Team (BIT), Environmental Health and Safety (EHS), as well as input from employees. Based on the findings, the WVPP will be updated to incorporate any necessary changes or improvements. This iterative process aims to enhance our strategies for preventing workplace violence, ensuring the safety and well-being of all university community members. All changes and updates will be communicated to employees, and additional training will be provided as necessary to address any new protocols or procedures.

#### RECORDKEEPING

- Records of workplace violence hazard identification, evaluation, and correction shall be created and maintained for a minimum of seven years.
- Training records shall be created and maintained for a minimum of one year and include training
  dates, contents or a summary of the training sessions, names and qualifications of persons
  conducting the training, and names and job titles of all persons attending the training sessions.
- Violent incident logs required by subdivision shall be maintained for a minimum of five years.
- Records of workplace violence incident investigations shall be maintained for a minimum of five years. These records shall not contain "medical information," as defined in subdivision (j) of Section 56.05 of the Civil Code.
- All records required by this subdivision shall be made available to the division upon request for examination and copying.
- All records required by paragraphs (1) to (3), inclusive, shall be made available to employees and their representatives, upon request and without cost, for examination and copying within fifteen calendar days of a request.

#### LINKS TO RELEVANT UC POLICIES AND UCI PROCEDURES:

- Injury and Illness Prevention Plan (IIPP)
- UC Policy on Sexual Violence and Sexual Harassment
- UC Anti-Discrimination Policy
- Clery
- Abusive Conduct