

WORKPLACE VIOLENCE PREVENTION PROGRAM for Berkeley School of Theology

Our establishment's Workplace Violence Prevention Plan (WVPP) addresses the hazards known to be associated with the four types of workplace violence as defined by [Labor Code \(LC\) section 6401.9](#).

Date of Last Review: 3.20.2026

Date of Last Revision(s):

DEFINITIONS

Emergency - Unanticipated circumstances that can be life threatening or pose a risk of significant injuries to employees or other persons.

Engineering controls - An aspect of the built space or a device that removes a hazard from the workplace or creates a barrier between the employee and the hazard.

Log - The violent incident log required by LC section 6401.9.

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

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

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

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

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

- The threat or use of physical force against an employee that results in, or has a high likelihood of resulting in, injury, psychological trauma, or stress, regardless of whether the employee sustains an injury.
- An incident involving a threat or use of a firearm or other dangerous weapon, including the use of common objects as weapons, regardless of whether the employee sustains an injury.
- The following four workplace violence types:

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

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

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

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

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

Work practice controls - Procedures and rules which are used to effectively reduce workplace violence hazards.

RESPONSIBILITY

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

Responsible Persons	Job Title/Position	WVPP Responsibility(ies)	Phone #	Email
Marie Lucero	COO	Overall responsibility for the plan; Marie approves the final plan and any major changes.	510-649-2437	mlucero@gtu.edu
Sylvie Tisnado	Director of Human Resources	Responsible for employee involvement and training; Sylvie organizes safety meetings, updates training materials, and handles any reports of workplace violence.	510-649-2577	stisnado@gtu.edu

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

EMPLOYEE ACTIVE INVOLVEMENT

BST ensures the following policies and procedures to obtain the active involvement of employees and authorized employee representatives in developing and implementing the plan:

- Management will work with and allow employees and authorized employee representatives to participate in:

Identifying, evaluating, and determining corrective measures to prevent workplace violence. Employees who are part of the WVPP working group participate in developing and implementing the WVPP. They are involved in identifying and determining corrective measures to prevent workplace violence.

Employees will be able to submit concerns and suggestions anonymously using a form.

At least once a semester at an All-Employee meeting, management and employees will discuss workplace violence related concerns/hazards, evaluate those hazards and/or concerns, and how to correct them.

- Designing and implementing training

Employees who are a part of the WVPP working group will participate in designing and implementing training programs. After the trainings are completed, a survey will be sent to all employees to get feedback and suggestions will be incorporated in future trainings and into the training materials.

- Reporting and investigating workplace violence incidents.

All threats or acts of workplace violence are to be reported. Employees can report incidents to their supervisor, HR, or through an anonymous form. Employees should cooperate fully in investigations/assessments of allegations of workplace violence.

- 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.

All employees will follow all workplace violence prevention plan directives, policies, and procedures, and assist in maintaining a safe work environment.

Employees will behave professionally towards one another, treating one another with respect, even when there are disagreements. If a situation escalates into the definitions in the WVPP, employees should follow the reporting procedures laid out in the plan.

- The plan shall be in effect at all times and in all work areas and be specific to the hazards and corrective measures for each work area and operation.

EMPLOYEE COMPLIANCE

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

- Training employees, supervisors, and managers in the provisions of BST Workplace Violence Prevention Plan (WVPP)
- Effective procedures to ensure that supervisory and nonsupervisory employees comply with the WVPP.

Management will ensure that all workplace security policies and procedures are clearly communicated and understood by all employees. Supervisors will enforce the policy fairly and uniformly.

- Providing retraining to employees whose safety performance is deficient with the WVPP.
- Recognizing employees who demonstrate safe work practices that promote the WVPP in the workplace by recognition by management at quarterly all-employee meetings.
- Discipline employees for failure to comply with the WVPP. Please refer to the “Workplace Conduct” section of the Employee Handbook.

COMMUNICATION WITH EMPLOYEES

BST recognizes that effective, two-way communication between management and employees is essential to

preventing and responding to workplace violence. The following systems are in place to ensure that workplace violence prevention information is clearly communicated and readily accessible:

New employee orientation includes workplace violence prevention policies and procedures, including an overview of the BST Workplace Violence Prevention Plan (WVPP), reporting procedures, and emergency response expectations.

Workplace violence prevention training is provided at hire and annually thereafter.

Regular all-employee meetings, held at least once per semester, address workplace violence concerns, emerging risks, and corrective measures.

Employees are encouraged to communicate directly with supervisors or Human Resources regarding any workplace violence concerns.

Communication is provided in a manner appropriate to employees' language and literacy levels.

Workplace violence prevention information is distributed through email and internal communication platforms.

Employees may report a violent incident, threat, or concern to a supervisor, to Human Resources, or through the BST Workplace Violence Reporting Form, which may be submitted confidentially or anonymously.

Emergency contact information, including procedures for calling 911 and key campus contacts, is posted in common areas.

Employees will not be prevented from accessing mobile or other communication devices to seek emergency assistance or verify safety.

All reported concerns will be reviewed promptly. Employees will be informed, as appropriate, of investigation outcomes and corrective measures consistent with confidentiality requirements and non-retaliation protections.

COORDINATION WITH OTHER EMPLOYERS

BST operates within facilities that are part of a multi-employer campus environment. To ensure effective prevention and response:

BST will coordinate implementation of its Workplace Violence Prevention Plan with the Graduate Theological Union and other campus employers as applicable.

BST will participate in shared safety communications and emergency planning efforts affecting common areas, building access systems, lighting, and security infrastructure.

Where incidents involve shared facilities or impact employees of multiple employers, BST will cooperate in information sharing consistent with privacy requirements.

If a BST employee experiences a workplace violence incident at a multi-employer worksite, BST will record the incident in its Violent Incident Log and provide required documentation to the controlling employer as required by law.

BST remains responsible for implementation of its WVPP for its own employees.

WORKPLACE VIOLENCE INCIDENT REPORTING PROCEDURE

BST maintains procedures to ensure that all threats or acts of workplace violence are reported promptly and addressed appropriately.

Employees must report incidents or threats of workplace violence to:

- Their immediate supervisor; or
- Human Resources; or
- The BST Workplace Violence Reporting Form, which may be submitted confidentially or anonymously.

Reports may include physical acts, threats (verbal, written, or electronic), or behaviors that reasonably convey an intent to cause harm.

Supervisors receiving a report will promptly notify the WVPP Administrator. If an employee believes reporting to a supervisor is not appropriate, they may report directly to Human Resources or through the reporting form.

In cases involving immediate danger, employees should call 911 first and then notify a supervisor or Human Resources as soon as practicable.

BST maintains a strict non-retaliation policy. Retaliation against any individual for reporting a workplace violence concern is prohibited and may result in disciplinary action.

All qualifying incidents will be documented in the Violent Incident Log and investigated in accordance with the Post-Incident Response and Investigation procedures outlined in this plan.

EMERGENCY RESPONSE PROCEDURES

BST has established the following procedures to respond to workplace violence emergencies:

Immediate Threat

If there is an imminent threat of violence or active emergency, employees must call 911 and then notify a supervisor or Human Resources as soon as it is safe to do so.

Emergency Notification

Employees may be alerted to emergencies through direct verbal communication, email, mobile communication, or coordination with GTU emergency systems where applicable.

Evacuation or Shelter-in-Place

Depending on the nature of the emergency, employees will evacuate using designated exit routes or shelter in place as directed. Evacuation routes and emergency exits are posted throughout campus facilities.

Access to Assistance

Employees may contact 911, Human Resources, or campus administration as appropriate.

Post-Emergency Coordination

Following a workplace violence emergency, BST will coordinate with law enforcement and campus partners as necessary, document the incident, and implement corrective measures to prevent recurrence. Employees will have access to support resources as outlined in this plan.

WORKPLACE VIOLENCE HAZARD IDENTIFICATION AND EVALUATION

The following policies and procedures are established and required to be conducted by **BST** 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.

Review all submitted/reported concerns of potential hazards:

- Regular review of all submitted and reported concerns. Workdays only.
- Regular review of building entrance doors, emergency doors, egress paths, and emergency lighting. Workdays only.
- Regular review of camera footage for select areas.

Periodic Inspections

Periodic inspections of workplace violence hazards will identify unsafe conditions and work practices. This may require assessment for more than one type of workplace violence. Periodic Inspections shall be conducted regularly around the buildings and via cameras.

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

Specific Person Name/Job Title	Area/Department/Specific location
Umoja Furaha, Maintenance Technician	Entrance doors, emergency exit doors & stairwells, emergency lights (interior)
Tom Larson, Director of Facilities	Mechanical rooms, exterior lighting, gates
Estifanos Tesfe, Manager of IT	Cameras & access logs
Marie Lucero, COO	Cameras

Inspections for workplace violence hazards include assessing:

- Procedures for employee response during a violent crime.
- Procedures for reporting suspicious persons or activities.
- Effective location and functioning of emergency lighting and exterior lighting.
- Whether employees have effective escape routes from the workplace.
- Adequacy of workplace security systems, such as door locks, entry or badge readers.
- Frequency and severity of threatening or hostile situations that may lead to violent acts by persons who are visiting our campus quad/green space.
- The availability of employee escape routes.
- Access to and freedom of movement within the workplace by non-employees.
- Any prior violent acts, threats of physical violence, verbal abuse, property damage or other signs of strain

or pressure in the workplace

WORKPLACE VIOLENCE HAZARD CORRECTION

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

- If an imminent workplace violence hazard exists that cannot be immediately abated without endangering employee(s) , all exposed employee(s) will be removed from the situation except those necessary to correct the existing condition. Employees necessary to correct the hazardous condition will be provided with the necessary protection
 - All corrective actions taken will be documented and dated on the appropriate forms.
 - Corrective measures for workplace violence hazards will be specific to a given work area or function.
 - Provide workplace violence systems
 - Ensure the adequacy of workplace violence systems
 - Post emergency telephone numbers for law enforcement, fire, and medical services
 - Control, access to, and freedom of movement within, the workplace by non-employees
 - Install effective systems to warn others of a violence danger or to summon assistance
 - Ensure employees have access to a telephone with an outside line. Provide employee training/re-training(refreshers) on the WVPP
 - Ensure adequate employee escape routes.
 - Through training, increase awareness by employees, supervisors, and managers of the warning signs of potential workplace violence.
 - Ensure that employee disciplinary and discharge procedures address the potential for workplace violence.
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PROCEDURES FOR POST INCIDENT RESPONSE AND INVESTIGATION

After a workplace incident, the WVPP administrator or their designee will implement the following post-incident procedures:

- Visit the scene of an incident as soon as safe and practicable.
- Interview involved parties, such as employees, witnesses, law enforcement, and/or security personnel.
- Review security footage of existing security cameras if applicable.
- Examine the workplace for security risk factors associated with the incident, including any previous reports of inappropriate behavior by the perpetrator.
- Determine the cause of the incident.
- Take corrective action to prevent similar incidents from occurring.
- Record the findings and ensuring corrective actions are taken.

- Obtain any reports completed by law enforcement.
- The violent incident log will be used for every workplace violence incident and will include information, such as: See attached Violent Incident Log
 - The date, time, and location of the incident.
 - The workplace violence type or types involved in the incident.
 - A detailed description of the incident.
 - A classification of who committed the violence, including whether the perpetrator was a client or customer, family or friend of a client or customer, stranger with criminal intent, coworker, supervisor or manager, partner or spouse, parent or relative, or other perpetrator.
 - A classification of circumstances at the time of the incident, including, but not limited to, whether the employee was completing usual job duties, working in poorly lit areas, rushed, working during a low staffing level, isolated or alone, unable to get help or assistance, working in a community setting, or working in an unfamiliar or new location.
 - A classification of where the incident occurred, such as in the workplace, parking lot or other area outside the workplace, or other area.
 - The type of incident, including, but not limited to, whether it involved any of the following:
 - Physical attack without a weapon, including, but not limited to, biting, choking, grabbing, hair pulling, kicking, punching, slapping, pushing, pulling, scratching, or spitting.
 - Attack with a weapon or object, including, but not limited to, a firearm, knife, or other object.
 - Threat of physical force or threat of the use of a weapon or other object.
 - Sexual assault or threat, including, but not limited to, rape, attempted rape, physical display, or unwanted verbal or physical sexual contact.
 - Animal attack.
 - Other.
 - Consequences of the incident, including, but not limited to:
 - Whether law enforcement was contacted and their response.
 - Actions taken to protect employees from a continuing threat or from any other hazards identified as a result of the incident.
 - Information about the person completing the log, including their name, job title, and the date completed.
- Reviewing all previous incidents.
- Support and resources, such as counseling services, are provided to affected employees. HR will provide information about the employee assistance program and inform employees that they can take time off work.

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

that, alone or in combination with other publicly available information, reveals the person's identity.

TRAINING AND INSTRUCTION

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

- When the WVPP is first established. It is planned to record this initial training so that the recording can be watched by new employees when they are hired.

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

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

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

- The employer's WVPP, how to obtain a copy of the employer's plan at no cost, and how to participate in development and implementation of the employer's plan.
- How to report workplace violence incidents or concerns to the employer or law enforcement without fear of reprisal.
- Workplace violence hazards specific to the employees' jobs, the corrective measures BST has implemented, how to seek assistance to prevent or respond to violence, and strategies to avoid physical harm.
- The violent incident log and how to obtain copies of records pertaining to hazard identification, evaluation and correction, training records, and violent incident logs.
- Interactive questions and answers with a person knowledgeable about the BST plan.
- Strategies to avoid/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.
 - 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.
- Information about the EAP

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

EMPLOYEE ACCESS TO THE WRITTEN WVPP

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

- Whenever an employee or designated representative requests a copy of the written WVPP, we will provide the requester with a printed copy of the WVPP, unless the employee or designated representative agrees to receive an electronic copy.
 - We will provide unobstructed access through a server, which allows an employee to review, print, and email the current version of the written WVPP. Unobstructed access means that the employee, as part of their regular work duties, predictably and routinely uses the electronic means to communicate with management or co-employees.
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RECORDKEEPING

BST will:

- Create and maintain records of workplace violence hazard identification, evaluation, and correction, for a minimum of five (5) years.
 - Create and maintain training records for a minimum of one (1) year and include the following:
 - Training dates.
 - Contents or a summary of the training sessions.
 - Names and qualifications of persons conducting the training.
 - Names and job titles of all persons attending the training sessions.
 - Maintain violent incident logs for minimum of five (5) years.
 - Maintain records of workplace violence incident investigations for a minimum of five (5) years.
 - The records shall not contain medical information per subdivision (j) of section 56.05 of the Civil Code.
 - All records of workplace violence hazard identification, evaluation, and correction; training, incident logs and workplace violence incident investigations required by [LC section 6401.9\(f\)](#), shall be made available to Cal/OSHA upon request for examination and copying.
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EMPLOYEE ACCESS TO RECORDS

The following records shall be made available to employees and their representatives, upon request and without cost, for examination and copying within **15 calendar days of a request**:

- Records of workplace violence hazard identification, evaluation, and correction.
 - Training records.
 - Violent incident logs.
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REVIEW AND REVISION OF THE WVPP

The BST WVPP will be reviewed for effectiveness:

- At least annually.

- When a deficiency is observed or becomes apparent.
- After a workplace violence incident.
- As needed.

Review and revision of the WVPP will include the procedures listed in the EMPLOYEE ACTIVE INVOLVEMENT section of this WVPP, as well as the following procedures to obtain the active involvement of employees and authorized employee representatives in reviewing the plan's effectiveness:

- Review of BST's WVPP should include, but is not limited to:
 - Review of incident investigations and the violent incident log.
 - Assessment of the effectiveness of security systems, including alarms, emergency response, and security personnel availability (if applicable).
- Review that violence risks are being properly identified, evaluated, and corrected. Any necessary revisions are made promptly and communicated to all employees. [These revisions could involve changes to procedures, updates to contact information, and additions to training materials.]

EMPLOYER REPORTING RESPONSIBILITIES

As required by [California Code of Regulations \(CCR\), Title 8, Section 342\(a\). Reporting Work-Connected Fatalities and Serious Injuries](#), BST will immediately report to Cal/OSHA any serious injury or illness (as defined by [CCR, Title 8, Section 330\(h\)](#)), or death (including any due to Workplace Violence) of an employee occurring in a place of employment or in connection with any employment.

I, Marie Lucero, Chief Operating Officer of BST, hereby authorize and ensure, the establishment, implementation, and maintenance of this written workplace violence prevention plan and the documents/forms within this written plan. I am committed to promoting a culture of safety and violence prevention in our workplace and believe that these policies and procedures will help us achieve that goal.



Marie Lucero, Chief Operating Officer

Violent Incident Log

This log must be used for every workplace violence incident that occurs in our workplace. At a minimum, it will include the information required by LC section 6401.9(d).

The information that is recorded will be based on:

- Information provided by the employees who experienced the incident of violence.
- Witness statements.
- All other investigation findings.

All information that personally identifies the individual(s) involved will be omitted from this log, such as:

- Names
- Addresses – physical and electronic
- Telephone numbers
- Social security number

Date of Incident:

Time a.m./p.m. of incident:

Location(s) of Incident	Workplace Violence Type (Indicate which type(s) (Type 1, 2,3,4)

Check which of the following describes the type(s) of incident, and explain in detail:

Note: It's important to understand that "Workplace Violence Type" and "Type of Incident" have separate requirements. **For this part of the log, "Type of Incident" specifically refers to the nature or characteristics of the incident being logged. It does not refer to the type of workplace violence.**

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

Provide a detailed description of the incident and any additional information on the violence incident type and what it included. Continue on separate sheet of paper if necessary.

Did the severity of the injuries require reporting to Cal/OSHA? If yes, document the date and time this was done, along with the name of the Cal/OSHA representative contacted.

A copy of this violent incident log needs to be provided to the employer. Indicate when it was provided and to whom.

This violent incident log was completed by:

Name: _____

Job Title: _____

Date: _____

Signature: _____