

**UNIVERSITY OF CALIFORNIA, DAVIS
AUDIT AND MANAGEMENT ADVISORY SERVICES**

**UC Davis
Workplace Violence Prevention
Audit & Management Advisory Services Project #25-02**

September 2024

Fieldwork Performed by:

Katie McLeod, Campus Audit Manager

Reviewed and Approved by:

Ryan Dickson, Director

**Workplace Violence Prevention
AMAS Project #25-02**

MANAGEMENT SUMMARY

Background

As part of the fiscal year (FY) 2025 audit plan, AMAS reviewed the UC Davis Campus and Health Workplace Violence Prevention (WPVP) plans.

California Senate Bill 553 set forth new requirements for Workplace Violence Prevention (WPVP), effective July 1, 2024. The bill updated California Labor Code, Sections 6401.7 and 6401.9 to include new requirements for employer WPVP plans, employee training, communications and reporting, violent incident log components, and records management. Prior to the new requirements, UC Davis Campus and Health each had separate WPVP teams.

Due to the strict WPVP requirements for healthcare settings, the existing UC Davis Health WPVP plan and threat assessment procedures are in line with the new general requirements. To leverage the experience and knowledge of the UC Davis Health WPVP team and add support to UC Davis campus, the two teams were combined under the leadership of the UC Davis Health WPVP Director. The new WPVP team worked with the UC Office of the President (UCOP) to ensure compliance with the new requirements, including plan development, training, and communications.

Purpose and Scope

The purpose of this audit was to assess the UC Davis WPVP plan(s) and procedures for mitigating threat risk and receiving, assessing, and responding to reports of workplace violence to ensure workplace safety and compliance with state law.

The scope of this audit includes evaluation of the fiscal year 2025 WPVP program(s) at UC Davis, effective July 1, 2024.

To accomplish these objectives, we conducted the following audit procedures:

- Gained an understanding of the California state law requirements, effective July 1, 2024, and the current UC Davis campus and health WPVP program(s).
- Identified best practices for WPVP plans to help ensure compliance with the new state law.
- Obtained documentation and reviewed the following sections of the UC Davis campus and health WPVP programs for compliance with state law and best practices:
 - UC Davis WPVP plans
 - Violent incident reporting systems and logs
 - Mandatory employee training
 - Records management, retention, and employee access to records

Conclusion

During our WPVP plan compliance review, we verified that the UC Davis Health and Campus WPVP plans include all required attributes, in accordance with state law, and determined that the current plans are available on the WPVP website, as required. In addition, we confirmed

compliance with required information and procedures for WPVP plans, set forth in CA Labor Code, sections 6401.7 and 6401.9. UCOP identified the California Division of Occupational Safety (Cal/OSHA) Cal/OSHA WPVP template as a tool to help ensure compliance with WPVP plan development and used it as a guide system-wide. During compliance testing, we also concluded that the campus WPVP plan did not include all sections provided in the Cal/OSHA template, such as employee access to records. After discussing the issue with the WPVP management team, the plan was updated to include the required section. The updated plan was posted publicly, on the WPVP Team website, as required.

We completed the mandatory, system-wide employee training for WPVP and verified that all required attributes are included, except for employee access to records. The system-wide training provides links to campus WPVP plans and resources for additional training and information; however, based on our review of the UC Davis WPVP website and the WPVP plans, we determined that there is no information available on how to access records. In addition, although each WPVP plan includes the records retention policy, we determined that the UC Davis WPVP team does not have formal, written procedures to ensure compliance with records management and retention requirements.

During the violent incident log compliance review, we determined that the campus and Health WPVP teams have separate online reporting systems through Risk and Safety Solutions (RSS) and RLDatix, respectively. Based on our review of the online systems and reports, we verified compliance with violent incident log requirements.

Observations, Recommendations, and Management Corrective Actions**A. Recordkeeping and Retention Procedures**

The UCD WPVP team does not have formal, documented procedures to ensure compliance with records management and retention requirements.

During our compliance review of the UC Davis WPVP plans, we verified that the plans include records management and retention policies, in accordance with state law. However, the procedures in place to ensure compliance have not been formalized or documented. The UC Davis WPVP team currently follows informal records management procedures and is creating a standard work guide that will include procedures to ensure compliance with records management and retention.

CA Labor Code, §6401.9(f) provides records management and retention requirements for workplace violence hazard identification, evaluation, and correction; violent incident logs; employee training; investigations; and access to records for employees and/or their representatives. These records must be maintained for five years, except for training records, which must be maintained for 1one year. Without formal, documented procedures for records management and retention, the risk of noncompliance with these requirements increases significantly.

Recommendations

- 1) To ensure compliance with WPVP recordkeeping and retention requirements, management should implement a standard work guide that includes procedures for recordkeeping, records retention, employee access to records, and WPVP team member roles and responsibilities related to records management and oversight.

Management Corrective Actions

- 1) By April 1, 2025, the WPVP team will implement a standard work guide that includes procedures for recordkeeping, records retention, employee access to records, and WPVP team member roles and responsibilities related to records management and oversight.