# Workplace Violence Prevention Plan

Updated: **June 28, 2024**

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**COMMITMENT TO PREVENTING AND ADDRESSING WORKPLACE VIOLENCE**

We are committed to creating a positive, caring, and safe work environment, which includes taking the initiative to maintain a secure work environment and practice safe work habits. This Workplace Violence Prevention Plan (WVPP or Plan) of Wayfinder Family Services (Company) is designed with our Company values in mind while complying with the applicable law and operates along with other Company policies relating to workplace safety, including our Emergency Preparedness Plan (EPP) and Safe at Work Playbook.

The purpose of the WVPP is to protect employees, clients, visitors, and vendors from any threat of violence or workplace violence and effectively address such incidents should they arise. The Plan does not apply to employees who are teleworking from a location of their choice that is not under the Company's control.

You should be familiar with the Company's WVPP and your role in preventing and addressing incidents of workplace violence. If you have questions, your supervisor, the WVPP Administrator, and the management team are all available to answer them.

Thank you for all you do to create and foster a safe and secure work environment.

**IMPORTANT DEFINITIONS:**

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

***"Threat of violence"*** means 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"*** means 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.

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

Workplace violence is one type of Active Threat as defined in our EPP.

There are four types of workplace violence under the workplace violence prevention law:

- *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 workers 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.

## RESPONSIBILITY FOR IMPLEMENTING THE PLAN

The WVPP summarizes individual responsibilities, how we strive to safeguard employees, clients, and visitors while ensuring continuity of operations, and specific tools and procedures for doing so. While compliance is critical, our overarching goal is worker safety.

The WVPP Administrator identified below has overall authority and responsibility for the implementation of the provisions of the WVPP. The WVPP Administrator can be reached at the contact information below.  The WVPP Administrator, or designee, works closely with management in the formation and support of the WVPP Safety  Group, which will be responsible for addressing workplace violence issues at the individual facility level.  The key positions responsible for WVPP, including those who work closely with the WVPP Administrator are:

| Function | Name/Title | Contact Information |
|---|---|---|
|  |  |  |
| WVPP Administrator | Donna Roberts | Work phone: (323) 290-4393 Cell phone: (310)748-8764 |
| HR Coordinator | Sandra Cisneros | Work phone: (323) 295-4555 Ext 204 Cell phone: (323) 854-5765 |
| Safety Coordinator | Joan Marason | Work phone: (323) 290-6296 Cell phone: (310) 912-0798 |
| Site Safety Lead | The most senior person assigned to the site or site administrator per CCL |  |

WVPP Administrator-The WVPP Administrator will ensure that:

- The Plan is complete and updated as required.
- The Plan is available to all employees.
- Oversee workplace violence hazard assessment and inspections, as appropriate, to evaluate the work tasks of all employees and determine the presence of hazards, conditions, operations, and other situations that might place workers at risk of workplace violence incidents.

- Review previous incidents of violence or threats of violence in the workplace and other records identifying patterns that may indicate causes and severity of incidents and identify changes necessary to correct hazards.

**The Safety Coordinator and HR** Coordinator will:

- Implement the Plan's provisions with assistance from the management/supervisor team, Safety Committee, and all employees.
- Ensure all managers and supervisors are trained in their individual safety responsibilities related to the Plan.

**Site Safety Lead (Department Heads, Managers, Supervisors, and CCL Administrators)** must:
- Inform team members of the Plan and enforce compliance.
- Ensure employees know specific procedures for dealing with workplace threats and emergencies and how to contact police, fire, and other safety and security officials.
- Ensure employees with special needs and employees responsible for clients with special needs are aware of emergency evacuation procedures and have assistance (as necessary) regarding emergency evacuation situations.
- Respond to potential threats and escalating situations by utilizing proper resources from local law enforcement and medical services, Human Resources staff, and the Employee Assistance Program (EAP).
- Coordinate policies, plans, and procedures with state agencies as applicable.
- Promote positive behavior and lead by example through modeling appropriate behavior and by treating employees and clients with respect and dignity.
- Contribute to creating a workplace where established standards of conduct are clear, communicated, and consistently enforced and where corrective action, including discipline, is used fairly to deal with instances of unacceptable behavior.
- Treat all reports of violence or threats of violence seriously.
- Understand that individuals participating in or tolerating workplace violence or retaliation are subject to discipline up to and including termination.
- Report all potential violence or acts of violence, regardless of individual or behaviors witnessed, to the senior director of Human Resources or the director of Human Resources.
- Complete a Violent Incident Log (Appendix A) after every incident of workplace violence.

## EMPLOYEE ACCESS

A copy of this WVPP is also available and accessible to employees electronically on our website under Employee Links and in the employee self-service portal in Paycom. In addition, the WVPP is available to employees and the Division of Occupational Safety and Health upon request to the WVPP Administrator or to your site's Site Safety Lead.

## INVOLVEMENT OF EMPLOYEES

The Company encourages the active involvement of employees in developing and implementing the Plan. The Company's WVPP Safety Group is responsible for reviewing the WVPP and overseeing the development and implementation of that Plan. The WVPP Safety Group, led by the WVPP Administrator or designee, includes one or more non-management employees or otherwise seeks input from employees. The WVPP Safety Group oversees the identification, evaluation, and correction of workplace violence hazards and helps inform the WVPP training. To participate in the WVPP Safety Group, please contact the WVPP Administrator.

## COORDINATION WITH OTHER EMPLOYERS

The Company will coordinate the implementation of the Plan with any other employers whose employees work in the workplace to ensure that those employers and employees understand their respective roles under this Plan. The employees of such other employers must complete training on workplace violence prevention, and such employers must ensure that workplace violence incidents involving any employees are reported, investigated, and recorded.

## ACCEPTING AND RESPONDING TO REPORTS OF WORKPLACE VIOLENCE

Employees are required to report threats or acts of workplace violence to a manager or supervisor, or the WVPP Administrator. Anonymous reporting is accommodated by contacting the Wayfinder Employee Hotline at 323.601-8762. Employees may also anonymously or otherwise notify management of safety and health concerns at any time by working through the WVPP Safety Group or agency Safety Committee or calling the hotline. The Company will take appropriate measures in response.  See incident response procedures below.

The Company strictly prohibits retaliation against any employee for making a report of workplace violence.

## COMPLIANCE

Managers, supervisors, and department heads are responsible for ensuring that all safety and health policies and procedures related to workplace violence prevention are clearly communicated and understood by all employees. All employees are responsible for using safe work practices, following all directives, policies, and procedures to assist in maintaining a safe work environment, and promoting safety whenever and wherever possible.

Managers, supervisors, and department heads are trained and retrained, as appropriate, on the WVPP.  Managers, supervisors, and department heads are expected to enforce the rules and expectations fairly and uniformly and without any retaliation. The following is our system of ensuring that all workers comply with the work practices designed to prevent workplace violence incidents, ensure they are properly addressed when they occur, and maintain a safe work environment:

1. Inform employees, supervisors, and managers of the provisions of our WVPP;
2. Train employees, supervisors, managers, and department heads of the provisions of the WVPP when the Plan is first established and annually thereafter;
3. Train all new employees and all employees given a new job assignment of the provisions of the WVPP when they are hired;

4. Provide training to instruct employees on general safe and healthy work practices and provide specific instruction with respect to hazards specific to each employee's job assignment;
5. Evaluate the performance of all employees in complying with our agency's workplace security measures;
6. Identify and evaluate workplace hazards, including scheduling periodic inspections to identify unsafe conditions and work practices and promptly correcting any unsafe or unhealthy conditions or work practices;
7. Provide retraining to employees who do not meet expectations relating to the WVPP;
8. Provide a system for communicating with employees about occupational health and safety matters, including a means that employees can use to inform the employer of hazards at the worksite without fear of reprisal;
9. Provide special precautions for employees exposed to external workplace violence; and
10. Discipline employees for failure to adhere to the WVPP.

## COMMUNICATION

The Company recognizes that to maintain a safe and secure work environment it must maintain communication on matters of workplace violence with all employees, including the employees of other employers that work in the facility. The following is our system of communication, designed to facilitate a continuous flow of two-way (management, supervisor, and employees) safety, health, and security information in a form that is readily understandable to and between all affected site personnel and maintained free from fear of reprisal:

1. Workplace-specific training on the WVPP.
2. Review of safety concerns at quarterly safety committee meetings.
3. Effective documentation and communication of information regarding conditions that increase the potential for workplace violence to other workers and between shifts and locations.
   a. For general information, communications will be accomplished via all-staff emails.
   b. For imminent threats of violence, the agency's mass texting system can be used as well.
4. Posted and distributed safety information, including current safety news and activities and safety reading materials, using various means such as signs, posters, memos, flyers, paycheck inserts, and bulletin boards for easy access to information.
5. A system for reporting workplace violence incidents and concerns. Violent incidents, threats, or other concerns related to workplace violence should be directly reported to a manager or supervisor, or the WVPP Administrator. Anonymous reporting is accommodated by contacting the Wayfinder Employee Hotline. Employees may also anonymously notify management of safety and health concerns at any time by working through the Safety Committee or the WVPP Safety Group. **Retaliation against any employee for reporting an incident, threat, or other workplace violence concern is strictly prohibited.**
6. A system for protecting employees who report threats from retaliation by the person making the threats of violence. Employees who report incidents of workplace violence will be protected from the person making the threats by the Company immediately taking

the appropriate actions, such as removing the person making the threats from the work area until the situation is resolved. For serious threats or acts of violence, local police will be called.

**PROCEDURE FOR REPORTING THREATS OR ACTS OF WORKPLACE VIOLENCE**

An important part of the communication component of workplace violence prevention is reporting any threats or acts of workplace violence. Employees are required to report such incidents and should do so in accordance with the following:

1. Immediately report all violent incidents, threats, or other workplace violence concerns to your supervisor or manager, or the manager on duty, without fear of reprisal.
2. The manager, supervisor, or manager on duty will contact law enforcement, if appropriate, and coordinate with them to report and investigate the workplace violence incident.
3. The supervisor or manager will complete a Violent Incident Log (Appendix A) and give it to the WVPP Administrator and Human Resources. The WVPP Administrator will inform the reporting employee of the investigation's results and any resulting corrective actions taken.

Appendix D - Workplace Violence Prevention Program Progressive Behavior Action Guidelines provides behaviors and manager/supervisors guidelines for appropriate actions to take.

**INCIDENT RESPONSE**

The WVPP Administrator is responsible for developing procedures for responding to actual or potential workplace violence emergencies, including effective means to alert employees of the presence, location, and nature of workplace violence emergencies, evacuation or sheltering plans as appropriate and feasible, and how to communicate with and obtain help from staff assigned to respond to workplace violence emergencies, security personnel or law enforcement, as applicable.

The Company will follow the following procedures when responding to actual or potential workplace violence emergencies, including, but not limited to, all of the following:

1. Alert employees of the presence, location, and nature of workplace violence emergencies and communication practices during such an event. Depending on the site and situation, this will be done through various means: emails, text alert systems, and PA systems.
2. Enforcing evacuation or sheltering plans that are appropriate and feasible for the worksite
3. Communication about how to obtain help from staff assigned to respond to workplace violence emergencies at your site, security personnel, if any, and law enforcement

The Company's procedures when responding to a violent act where one or more persons are injured include:

1. Anyone involved in a violent attack or who witnesses an attack resulting in an injury that requires more than first aid will contact emergency services.
2. The injured will be transported to medical care facilities.
3. The incident will be reported to police and other authorities as required by law.
4. The area where the violent actions occurred will be secured to protect evidence and minimize any disturbance during the post-incident response process.

5. A **Violent Incident Log** will be prepared.
6. Injured persons, witnesses to the incident, and other affected employees will be offered counseling to reduce trauma and stress.

**TRAINING**

All workplace employees, including management employees, receive effective training on workplace violence prevention when the WVPP is first established and annually thereafter.

This training includes:

- The WVPP, how to obtain a copy of the Plan at no cost, and how to participate in the development and implementation of the Plan.
- A review and definitions and requirements under the WVPP.
- How to report workplace violence incidents or concerns to the Company or law enforcement without fear of reprisal.
- Workplace violence hazards specific to the employee's jobs, the corrective measures the Company 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 workplace violence hazard identification, evaluation and correction records, training records, and violent incident logs.
- An opportunity for interactive questions and answers with a person knowledgeable about the Company's Plan.

Additional training and instruction will be provided to all personnel whenever the Company is made aware of new or previously unrecognized security hazards. This training may be limited to addressing the new workplace violence hazard or changes to the Plan.

*Workplace Violence is one type of Active Threat.*

All Wayfinder Employees are required to take the Active Threat Training Upon Hire.

**IDENTIFICATION AND EVALUATION OF WORKPLACE VIOLENCE HAZARDS**

The Company conducts hazard assessments to identify and evaluate workplace violence hazards and threats of workplace violence. Inspections are conducted as appropriate after the development of the WVPP.

*Hazard Assessments*

When the WVPP was developed, the WVPP Administrator, along with the WVPP Safety Group, or designees, completed the Workplace Violence Hazard Assessment Checklist (Appendix C) for each location and/or program as a comprehensive workplace hazard assessment for workplace violence prevention.

*Inspections*

After the implementation of the WVPP, the WVPP Safety Group, or others familiar with the site, conducts inspections using the **Workplace Violence Hazard Assessment (Appendix C-1)** with the supplemental categories to identify and evaluate workplace violence hazards and threats of workplace violence.  Inspections are performed according to the following schedule:

1. After each workplace violence incident
2. When new or previously unidentified workplace violence/security hazards are recognized
3. Periodic inspections scheduled to occur annually

Inspections for violence prevention/security hazards consist of identification and evaluation of workplace hazards and changes in business practices and may require assessing for more than one type of workplace violence.  These inspections evaluate risk factors for workplace violence in each unit and area of the facility, including areas surrounding the facility, such as parking lots and outdoor areas.

In addition, Wayfinder's new hire surveys ask new hires: Do you feel safe in your work environment? This question is posed two weeks, 45 days, 75 days, and six months from the date of hire. HR follows up on any "no" responses.

Environmental risk factors will include, among others:

1. Employees working in locations isolated from other employees (including employees engaging with the public) because of being assigned to work alone or in remote locations, during the night or early morning hours, or where an assailant could prevent entry into the work area by responders or other employees
2. Poor illumination or blocked visibility of areas where possible assailants may be present
3. Lack of physical barriers between employees and persons at risk of committing workplace violence
4. Lack of effective escape routes
5. Obstacles and impediments to accessing alarm systems
6. Locations within the facility where alarm systems are not operational
7. Entryways where unauthorized entrance may occur, such as doors designated for staff entrance or emergency exits
8. Presence of any objects that can be used as weapons in the areas where the public has access

The Company performs inspections for each type of workplace violence by using the methods specified below to identify and evaluate workplace hazards.

*Inspections for Assessing Type 1 Violence Security Hazards*

1. The exterior and interior of the workplace for its attractiveness to robbers
2. The need for security surveillance measures, such as mirrors or cameras
3. Posting of signs notifying the public that limited cash is kept on the premises
4. Procedures for worker response during a robbery or other criminal act
5. Procedures for reporting suspicious persons or activities

6. Posting of emergency telephone numbers for law enforcement, fire, and medical services where workers have access to a telephone with an outside line
7. Limiting the amount of gift cards on hand

*Inspections for Assessing Type 2 Violence Security Hazards*

1. Access to, and freedom of movement within, the workplace
2. Adequacy of workplace security systems, such as door locks, security windows, physical barriers, and restraint systems
3. Frequency and severity of threatening or hostile situations that may lead to violent acts by persons who are service recipients of our establishment
4. Workers' skill in safely handling threatening or hostile service recipients
5. Effectiveness of systems and procedures to warn others of a security danger or to summon assistance, e.g., alarms
6. The use of work practices such as "buddy" systems
7. The availability of worker escape routes

*Inspections for Assessing Type 3 Violence Security Hazards*

1. How well our Company's anti-violence policy has been communicated to employees, supervisors and managers
2. How well our Company's management and employees communicate with one another
3. Our employees,' supervisors,' and managers' knowledge of the warning signs of potential workplace violence
4. Access to, and freedom of movement within, the workplace by non-workers, including recently discharged workers or persons with whom one of our workers is having a dispute
5. Frequency and severity of worker reports of threats of physical or verbal abuse by managers, supervisors, or other workers
6. Any prior violent acts, threats of physical violence, verbal abuse, property damage, or other signs of strain or pressure in the workplace
7. How well our Company's restraining order policy has been communicated to workers, supervisors or managers

*Inspections for Assessing Type 4 Violence Workplace Security*

1. Assess the factors for Type 3 Violence above
2. Frequency and severity of worker reports of threats of physical or verbal abuse by a person who has a personal relationship with the employee
3. Frequency and severity of worker reports of threats by individuals with a history of violent/threatening behavior
4. Frequency and severity of domestic violence situations brought to work
5. Any prior violent acts, threats of physical violence, verbal abuse, property damage, or other signs of violence by a person who has a personal relationship with an employee

**PROCEDURES TO CORRECT IDENTIFIED WORKPLACE VIOLENCE HAZARDS**

The Company will, under the authority of the WVPP Administrator or designee, correct unsafe conditions, work practices, and work procedures in a timely manner based on the severity of the hazard: (A) When observed or discovered; and (B) When an imminent hazard exists which cannot be immediately abated without endangering employee(s) and/or property, remove all exposed personnel from the area except those necessary to correct the existing condition. Employees necessary to correct the hazardous condition shall be provided the necessary safeguards.

If an identified corrective measure cannot be implemented within this timeframe, the Company will take interim measures to address any imminent or serious hazard while completing the permanent control.

Corrective measures may include, but not be limited to:

**Type 1 Violence**

Corrective measures for Type 1 Violence security hazards may include, but are not limited to:

1. Making the workplace unattractive to robbers and other criminal acts
2. Utilizing security guards or surveillance measures, such as cameras or mirrors, to provide information as to what is going on outside and inside the workplace
3. Reporting procedures for notifying designated employees of suspicious persons or activities
4. Posting emergency telephone numbers for law enforcement, fire, and medical services where employees have access to a telephone with an outside line
5. Training on emergency action procedures for employees, supervisors, and managers
6. Using alarm systems and access control systems
7. Addressing adequate lighting
8. Addressing employee isolation factors
9. Using alarm systems and access control systems
10. Increasing police patrol in the area
11. Posting laws against assault, stalking, or other violent acts
12. Providing staff with equipment to enhance their safety

**Type 2 Violence**

Corrective measures for Type 2 Violence security hazards may include, but are not limited to:

1. Training
2. Controlling access to the workplace and freedom of movement within it, consistent with business necessity
3. Examining and addressing employee isolation
4. Ensuring adequate workplace security/access control systems, such as door locks, security windows, physical barriers, and restraint systems

5. Providing worker training in recognizing and handling threatening or hostile situations that may lead to violent acts by persons who are service recipients of our establishment.
6. Placing effective systems to warn others of a security danger or to summon assistance, e.g., alarms or panic buttons
7. Providing procedures for a "buddy"" system
8. Ensuring adequate emergency escape routes
9. Eliminating access to potential weapons
10. Providing security personnel
11. Maintaining an accurate history of problem clients and notifications to employees
12. Posting laws against assault, stalking, or other violent acts

## Type 3 Violence

Corrective measures for Type 3 Violence security hazards may include, but are not limited to:

1. Communicating effectively our company's workplace violence prevention policy to all employees, supervisors, and managers.
2. Enforcing a policy of no tolerance for workplace violence
3. Implementing a policy prohibiting weapons
4. Improving how well our establishment's management and employees communicate with each other
5. Increasing employees, supervisors, and managers' awareness of the warning signs of potential workplace violence
6. Controlling 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
7. Providing counseling to employees, supervisors, or managers who exhibit behavior that represents strain or pressure, which may lead to physical or verbal abuse of co-workers
8. Ensuring all reports of violent acts, threats of physical violence, verbal abuse, property damage, or other signs of strain or pressure in the workplace are handled effectively by management and that the person making the report is not subject to retaliation by the aggressor
9. Ensuring worker disciplinary and discharge procedures address the potential for workplace violence
10. Providing security
11. Posting laws against assault, stalking, or other violent acts
12. Applying crime prevention measures through environmental design and administrative measures

## Type 4 Violence

Corrective measures for Type 4 Violence security hazards include, but are not limited to:

1. Providing active threat training
2. Enforcing policies on handling and preventing violence situations
3. Controlling access to the workplace and freedom of movement within it, consistent with business necessity

4. Enforcing policy prohibiting weapons
5. Reporting procedures
6. Relocating work site or staggering work hours
7. Filing restraining orders
8. Necessary staff notifications on restraining orders or potential threats
9. Personnel security
10. Posting laws against assault, stalking, or other violent acts

## POST-INCIDENT RESPONSE AND INVESTIGATION

When a violent incident occurs, the WVPP Administrator or designee promptly conducts a post-incident response and investigation.

### *Post-Incident Response*

The procedures for post-incident response include:

1. Providing immediate medical care or first aid to employees who have been injured in the incident
2. Taking any measures necessary to prevent others from being injured
3. Identifying all employees involved in the incident
4. Assessing whether any additional threats could arise because of or in conjunction with the incident
5. Conducting a post-incident debriefing session as soon as possible after the incident with all employees, supervisors, and security involved in the incident
6. Checking in with affected team member(s) by asking how they are doing and what they need, including connecting them with the employee assistant program (EAP), as needed
7. Following Human Resources and any agency procedures for reporting and filling out forms
8. Evaluating the incident for gaps or deficiencies in emergency response plans

Once a threat has subsided and immediate safety and health concerns have been addressed, the attention of the Company's leadership, managers, supervisors, and Human Resources staff should turn to the well-being of team members. If an incident is severe enough to cause team members to leave the workplace, provide guidance on when and where work will resume. When appropriate, leadership may consider whether to offer paid administrative leave.

The EAP is a useful resource for communicating with and providing support to team members on a group or individual basis. Individuals respond differently to stressful situations, and the EAP is available to help navigate these dynamics. Once all physical threats are resolved, the EAP can help address the mental and emotional well-being of team members.

Information on Wayfinder's EAP can be found here: H:\eLibrary\Human Resources Library\Wayfinder Magellan EAP Flyer.pdf.

*Investigative Procedures*

The incident investigation is a systematic method for collecting factual information that makes it possible to accurately reconstruct the workplace violence incident and determine the underlying reasons for the cause of the incident.  Once the root causes for the incident have been determined, corrective actions and preventative measures can be identified and effectively instituted. The basic steps in conducting an incident investigation are:

1. Visiting the scene of the incident as soon as possible;
2. Involving workers who work in the area or worksite where the event occurred in the incident investigation, as they may have some special insight into potential causes and solutions;
3. Identifying the root causes of the incident.  Ask "why" the perpetrator acted, "why" the worker responded in a certain way, etc.;
4. Interviewing involved workers and any witnesses;
5. Collecting and reviewing relevant information, including records related to training, maintenance, inspections, audits, and past incident reports;
6. Collecting facts on what, where, when, and how the incident occurred;
7. Examining the area for security risk factors associated with the incident, including any reports of previous inappropriate or violent behavior from the perpetrator;
8. Obtaining any reports completed by law enforcement;
9. Determining the cause of the incident and identifying contributing causes;
10. Recording the findings and corrective actions taken;
11. Completing the **Investigation Report Form** (See Appendix B) and **Violence Incident Log** (Appendix A); and,
12. Reviewing and revising the WVPP as needed.

When conducting an investigation, it is important to:

1. Investigate in an objective, fact-finding manner using probing, open-ended questions;
2. Take pictures and preserve all evidence as appropriate; and
3. Protect the privacy of the individual(s) involved.

Once the incident investigation is completed, corrective action should be taken to prevent the incident from reoccurring. The findings and corrective actions should be recorded on the Investigation Report Form.

*Violent Incident Log*

The supervisor or manager should complete a **Violent Incident Log (Appendix A)** for all reports or incidents of workplace violence. A copy will be provided to the WVPP Administrator and Human Resources.

**REVIEW OF THE WVPP**

The Company will periodically review the effectiveness of the WVPP, including the violent incident logs, and revise the Plan as needed. The WVPP will be reviewed with all managers,

supervisors, and employees. The WVPP will be reviewed annually when a deficiency is observed or becomes apparent and after a workplace violence incident.

The WVPP Administrator will coordinate the review and development of this Plan. The Plan will be reviewed on an annual basis. Changes may also be made due to information or guidance received from the California Division and Standards Board. Changes will be tracked using a record of changes table. Comments or suggestions for improving this Plan may be provided to Human Resources or the WVPP Administrator.

We encourage active involvement by all employees and authorized employee representatives in reviewing, developing, and implementing the WVPP. We will facilitate this involvement by all employees through their participation in identifying, evaluating, and correcting workplace violence hazards, designing and implementing training, and reporting and investigating workplace violence incidents.

We will facilitate the active involvement of all employees through periodic reminders, formalized employee training, emails, and other communication to raise awareness about the importance of our workplace violence prevention policies, threat and incident reporting procedures, and incident response practices.

**RECORDKEEPING**

The Company maintains records as follows:

- Records of workplace violence hazard identification, evaluation, and correction must be created and maintained for a minimum of five years.
- Every incident, post-incident response, and workplace violence injury investigation shall be recorded in a violent incident log.  The log will be reviewed annually in conjunction with the review of the WVPP.  It must be maintained for a minimum of five years.
- Records of workplace violence training must be maintained for a minimum of one year. Training records will include the dates that training was conducted, the contents or a summary of the training sessions, the names and qualifications of the persons conducting the training, and the names and job titles of all persons attending the training sessions.
- Records of workplace violence incident investigations must 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 will be made available to the California Division and Standards Board upon request for examination and copying.

The following records will 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
- Training records
- Violent Incident Logs

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**APPENDIX A**
**VIOLENT INCIDENT LOG**

The information in this log should be elicited from employees who experience workplace violence and be based on any investigative findings, including any witness statement relied upon.

The log must omit personal identifying information of any person involved in the violent incident (e.g., name, address, phone number, etc.)

| Violent Incident Log | |
| --- | --- |
| Date and Time of Incident: am/pm | Location of Incident |

**Detailed description of the incident:**

**Workplace Violence Type** *(check all that apply)*

| | |
| --- | --- |
| □ Type 1 Violence: workplace violence committed by a person who has no legitimate business at the workplace but to commit a robbery or other crime<br><br>□ Type 2 Violence: workplace violence directed at employees by customers, clients, patients, students, or visitors | □ Type 3 Violence: workplace violence against an employee by present/former employee, supervisor, or manager<br><br>□ 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 |

**Who committed the violence?**

| | |
| --- | --- |
| □ Client/customer<br>□ Family/friend of client/customer<br>□ Stranger with criminal intent<br>□ Co-worker | □ Supervisor/Manager<br>□ Partner or spouse (current or former)<br>□ Parent or relative<br>□ Other _____ |

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| | |

**At the time of the incident was the employee(s)?**

| | |
|---|---|
| □ Completing usual job duties<br>□ Working in a poorly lit area<br>□ Rushed<br>□ Working during low staffing level<br>□ Working in an unfamiliar or new location | □ Isolated or alone<br>□ Unable to get help or assistance<br>□ Working in a community setting<br>□ Other _____ |

**Where did the incident occur?**

| | |
|---|---|
| □ In the workplace<br>□ Restroom<br>□ Breakroom/cafeteria | □ Parking lot/other area outside premises<br>□ Other workplace area<br>_____ |

**Type of incident** *(check all that apply)*

| **Physical Assault**<br>□ Biting<br>□ Choking<br>□ Grabbing<br>□ Hair pulling<br>□ Kicking<br>□ Punching<br>□ Slapping<br>□ Pushing<br>□ Pulling<br>□ Scratching<br>□ Spitting<br>□ Other:_____ | **Attack with a weapon or object**<br>□ Firearm<br>□ Knife<br>□ Other object_____<br><br>**Sexual assault or threat**<br>□ Rape or attempted rape<br>□ Sexual Assault<br>□ Physical display<br>□ Other unwanted verbal/physical sexual contact<br>□ Other<br>**_____** | **Physical intimidation**<br>□ Stalking<br>□ Threat of physical force<br>□ Threat of use of weapon/other object<br><br>□ **Animal attack**<br><br>□ **Other _____** |
|---|---|---|

| **Did the employee receive medical treatment for the injury?** | □ Yes | □ No |
|---|---|---|
| **Was security or law enforcement contacted?** | □ Yes<br><br>Who? _____<br><br>What was<br>their response?<br>_____ | □ No |

**Actions taken to protect employees from a continuing threat or from other hazards identified as a result of the incident**

_____

| | |
|---|---|
| Report Completed By (Name): | Title: |
| | |
| Date Completed: | |

**APPENDIX B**
**INVESTIGATION REPORT**

| Workplace Location/Department | | Specific location/department where Incident Occurred | |
|---|---|---|---|
| Name of Impacted Employee(s) | | | |
| Employee's Occupation | | | Date of Incident |
| Did Employee leave work due to incident? | □ Yes  □ No | Date:  Time:          AM  PM | Time of Incident          AM  PM |
| Did Employee return to work? | □ Yes  □ No | Date Reported to you: | Time Reported:          AM  PM |
| Name of Witnesses | | | |
| Name and Address of Doctor or Hospital where injured was Treated | | | |
| What was Employee doing during incident?  (Please be specific) | | | |
| How did the Incident occur?  (Please describe fully the events that resulted in injury.  Tell what happened and how it happened.  Please use separate sheet if necessary.) | | | |
| Was the employee injured?  (If so, the object or Individual that directly injured employee.) | | | |
| Describe the Injury – part of the body affected | | | |
| | | | |
| Possible Contributing Factors for Incident | | | |

What corrective actions have or will be taken to address the condition and prevent recurrence?


1.


2.


3.




Investigation conducted by:_____(Name)  _____(Title)     Date:

**APPENDIX C**
**WORKPLACE VIOLENCE PREVENTION RISK ASSESSMENT CHECKLIST - INITIAL**

Site:_____

Assessment Date:_____

Completed by:_____

This checklist should be used as part of its regular assessment of environmental and risk factors for workplace violence. In the "Notes" column, explain the specific circumstances of risk factors identified and/or indicate the follow-up required on a specific item. Beyond observing the physical environment, this assessment may require a review of documents and consultation with employees. *In the "Summary" section at the end, identify any risk areas and what corrective actions are being taken.*

| | Yes | No | Notes |
|---|---|---|---|
| **STAFFING** | | | |
| 1. Is there someone responsible for building security? If "yes," identify the individual. | | | |
| 2. Do employees work alone or in isolation? | | | |
| 3. Do employees work late at night or during early morning hours? | | | |
| 4. Do employees work in remote locations of the facility? | | | |
| 5. Is there sufficient staffing to permit those who are assigned to assist with a workplace violence incident to respond to an incident? | | | |
| **JOB DUTIES** | | | |
| 1. Do employees work with drugs or medication? | | | |
| 2. Do employees handle cash? | | | |
| 3. Do employees work with clients or visitors who have a history of violent behavior or behavior disorders? | | | |

| WORKPLACES/EVENTS | | | |
|---|---|---|---|
| 1. Do employees work off-site at customer or other locations (other than remotely from home)? | | | |
| 2. Do employees work at shared/co-working locations? | | | |
| **FACILITY DESIGN** | | | |
| 1. Are there enough exits and adequate routes of escape? | | | |
| 2. Are exits accessible and clearly marked? | | | |
| 3. Can exit doors be opened only from the inside to prevent unauthorized entry? | | | |
| 4. Is the lighting adequate to see clearly in indoor areas? | | | |
| 5. Are there any areas of blocked visibility? | | | |
| 6. Are there employee-only work areas that are separate from public/client areas? | | | |
| 7. Is access to work areas only through a reception area? | | | |
| 8. Are reception and work areas designed to prevent unauthorized entry? | | | |
| 9. Are there physical barriers between employees and potential assailants? | | | |
| 10. Could someone hear a worker call for help? | | | |
| 11. Are work areas free of objects that could be used as weapons? | | | |
| 12. Is furniture in work areas arranged to prevent workers from becoming trapped? | | | |
| 13. Is a secure place available for workers to store their personal belongings? | | | |
| 14. Are private, locked restrooms available for staff? | | | |
| 15. Is there adequate lighting within the worksite? | | | |
| **SECURITY MEASURES** | | | |
| Does the workplace have: | | | |

| | | | |
|---|---|---|---|
| 1. Security cameras or closed-circuit TV in high-risk areas? | | | |
| 2. Door locks? | | | |
| 3. System (including internal phone)to activate emergency assistance? | | | |
| 4. Phones with an outside line programmed to call 911? | | | |
| 5. Security mirrors (convex mirrors)? | | | |
| 6. Secured entry (buzzers)? | | | |
| 7. Communication devices? | | | |
| **OUTSIDE THE FACILITY** | | | |
| 1. Do workers feel safe walking to and from the workplace? | | | |
| 2. Do employees work in high crime areas? | | | |
| 3. Are the entrances to the building clearly visible from the street? | | | |
| 4. Is the area surrounding the building free of bushes or other hiding places? | | | |
| 5. Is video surveillance provided outside the building? | | | |
| 6. Is there enough lighting to see clearly outside the building? | | | |
| 7. Are all exterior walkways visible to personnel? | | | |
| 8. Is there a nearby parking lot reserved for employees only? | | | |
| 9. Is the parking lot secure? | | | |
| 10. Is the parking lot free of hiding places? | | | |
| 11. Is there enough lighting to see clearly in the parking lot and when walking to the building? | | | |
| 12. Is there offsite parking that employees use? | | | |
| 13. Have neighboring facilities and businesses experienced violence or crime? | | | |
| 14. Are there any entryways where unauthorized entrance may occur? | | | |
| 15. Is the employee parking garage secure when arriving, leaving, and during changes of shift? | | | |

| WORKPLACE PROCEDURES | | | |
|---|---|---|---|
| 1. Are employees given maps and clear directions in order to navigate the areas where they will be working? | | | |
| 2. Is public/client access to the building controlled? | | | |
| 3. Are floor plans posted showing building entrances, exits? | | | |
| 4. Are these floor plans visible only to staff and not to outsiders? | | | |
| 5. Is other emergency information posted, such as the telephone numbers? | | | |
| 6. Are security measures taken to protect workers late at night (escorts, locked entrances, etc.)? | | | |
| 7. Are access and freedom of movement within the workplace restricted *to* those persons who have a legitimate reason for being there? | | | |
| 8. Are visitors escorted to offices for appointments (if applicable)? | | | |
| 9. Is there an established procedure for signing in visitors? | | | |
| 10. Are authorized visitors to the building required to wear ID badges? | | | |
| 11. Are identification tags required for staff (omitting personal information other than first name)? | | | |
| 12. Is there a procedure for reporting suspicious persons or criminal acts to law enforcement? | | | |
| 13. Is there an established liaison with local police and counseling agencies? | | | |
| 14. Are clients or visitors in waiting areas clearly informed how to use the department's services so they will not become frustrated? (*think parents waiting on the child in counseling, potential client seeking information, early arrivals*). | | | |
| 15. Are waiting times for customer services kept short to prevent frustration? | | | |
| 16. Are broken windows and locks repaired promptly? | | | |

| | | | |
|---|---|---|---|
| 17. Are alarm systems (panic button alarms, silent arms, personal electronic alarm systems, etc.) being used for prompt security assistance? | | | |
| 18. Are security devices (locks, cameras, etc.) tested on a regular basis and repaired promptly when necessary? | | | |
| 19. Are escorts or "buddies" provided for people who work in potentially dangerous situations? | | | |
| 20. Do employees know to use security escort service after hours? | | | |
| 21. After hours, is the building locked down with only one access point? | | | |
| 22. Do employees use the "buddy system" when leaving work after hours? | | | |
| 23. Are employees able to locate emergency equipment (fire alarm boxes, emergency generator outlets, etc.)? | | | |
| 24. Is emergency equipment accessible and free from obstruction? | | | |
| 25. Are employees able to locate cellular phones, power failure phones, and/or radios for emergency communication? | | | |
| 26. Do employees know proper procedures if a firearm threat is announced? | | | |
| 27. Is the employee emergency call-back list up to date and available | | | |
| 28. Do employees provide privacy to reflect sensitivity and respect for clients and visitors? | | | |
| 29. Do employees use the "buddy system" to work together if problems arise? | | | |
| 30. Do employees working in the field have cellular phones or other communication devices to enable them to request aid? | | | |
| 31. Is there an evacuation or shelter plan for workplace emergencies (fire, earthquake, etc.)? | | | |

| | | | |
|---|---|---|---|
| 32. Are staffing levels appropriate for department/worksite functions? | | | |
| 33. Are reference manuals up-to-date and available to employees? | | | |
| 34. Is there an established procedure to administer worker discipline? | | | |
| 35. Is there an established procedure to discharge a worker? | | | |
| 36. Is there a grievance policy available to employees? | | | |
| 37. Is there a Safety Committee available as a resource to staff for any hazard concern? | | | |
| **INCIDENT HISTORY** | | | |
| 1. Has the worksite experienced violent behavior or threats from strangers? | | | |
| 2. Has the worksite experienced violent behavior or threats from customers or clients? | | | |
| 3. Has the worksite experienced violent behavior or threats from other employees? | | | |
| 4. Has the worksite experienced violent behavior or threats from former employees? | | | |
| 5. Has the worksite experienced domestic violence issues? | | | |

**Summary:**
Risk Example #1: Staff sometimes work late and alone.
Corrective Measure: If leaving the building after hours and alone, staff must call building security for escort.
Risk Example #2: Parking lot attracts homeless and drug addicts.
Corrective Measure:  All staff must exit in pairs.  All staff have been provided whistles.

Risk #1:
Corrective Measure:

Risk #2:Corrective
Measure:

**APPENDIX C-1**
**INSPECTIONS – CATEGORIES IN ADDITION TO INITIAL ASSESSMENT**

**In addition to the factors identified in the above initial assessment**, the following categories are considered as part of the inspection of environmental and risk factors for workplace violence after each workplace violence incident, whenever the employer is made aware of a new or previously unrecognized hazard, and as otherwise scheduled.

| MANAGEMENT COMMITMENT AND EMPLOYEE INVOLVEMENT | | | |
|---|---|---|---|
| Do managers, supervisors, or employees accept violence or threats of violence as "part of the job"? | | | |
| Do employees communicate information about potentially threatening customers or visitors to appropriate staff? | | | |
| Does management communicate information to workers about workplace violence incidents? | | | |
| Are employees familiar with the company's violence prevention policy? | | | |
| **TRAINING** | | | |
| Have employees received training on the WVPP? | | | |
| Are workers trained in the emergency response plan (i.e., escape routes, notifying proper authorities)? | | | |
| Are workers trained on how to ask for assistance by phone or alerting other staff? | | | |
| Are workers trained to report violent incidents, threats, or other workplace violence concerns? | | | |
| Have employees been trained on the workplace hazards specific to their jobs? | | | |
| Are workers trained in how to handle difficult customers or visitors? | | | |
| Are workers trained in how to recognize and handle threatening, aggressive, or violent behavior? | | | |
| Are workers trained in ways to prevent or defuse potentially violent situations? | | | |
| Have employees been trained in verbal de-escalation techniques? | | | |
| Are workers trained in personal safety and self-defense? | | | |

| | | | |
|---|---|---|---|
| Are workers assigned to respond to incidents of workplace violence adequately trained? | | | |
| **REPORTS/COMMUNICATION** | | | |
| Has the WVPP been effectively communicated to workers and their supervisors? | | | |
| Do workers, supervisors, and managers have sufficient knowledge of warning signs of potential workplace violence? | | | |
| Is there a notification system for alerting workers of emergencies or potential danger? | | | |
| Are violent incidents or threats being reported frequently? | | | |
| Are workers and their managers aware of how they should report violent incidents, threats, or other workplace violence concerns? | | | |
| Are employees required to report incidents or threats of violence, regardless of injury or severity? | | | |
| Is the reporting system clear? | | | |
| Were medical and psychological counseling services offered to employees who have been assaulted or threatened? | | | |
| **PRIOR INCIDENT REVIEW** | | | |
| Were all workplace violence incidents that occurred in the previous year reviewed pursuant to this assessment? | | | |
| Were any corrective actions taken as a result of any prior incidents of workplace violence reviewed pursuant to this assessment? | | | |
| What do the prior incidents reveal about the WVPP? | | | |

 COMMENTS:
_____
_____
_____
_____


Checklist Completed By: _____        Date:_____

Department/Unit: _____

**Workplace Violence Prevention Program Progressive Behavior Action Guidelines**

| Behavior Level | Behaviors | Manager/Supervisor's Guidelines for Action |
|---|---|---|
| **Level I** | The employee may: | |
| | Show signs of increasing stress, perhaps involving negative changes in behavior. | Observe, ask the employee how they are doing, and document. |
| | Show signs of a deterioration in work performance | Engage employee in conversation to gain insight into behavior, document |
| | Show signs of increasingly unkempt appearance. | Carefully offer help |
| | Show signs of alcohol or substance abuse. | Report concerns, if continuing, to the next higher-level supervisor, and seek consultation from your HR Team and EAP consulting services for managers/supervisors. |
| | Show signs of distress over personal or workplace problems | |
| | "act strange" or "unusual" by appearing confrontational, argumentative, stressed, anxious, withdrawn or secretive. | |
| | Behavior is such to cause concern for a person's own well-being or possibly others. | |
| **Level II** | The employee may: | |
| | Make veiled threats to harm. | Report concerns to the next higher-level supervisor before any effort to engage the person. |
| | Intimidate others | Engage the person in conversation, if appropriate, to gain insight into the potential for violent behavior and document it. |
| | Have a history of violent behavior and lose temper easily. | |
| | Be chronically disgruntled and inflexible. | Consult with the next higher level of administration as a follow-up. |
| | Refuse to take responsibility for problems or actions | Seek consultation from your Personnel Office |
| | Find fault with and blame others. | |
| | Have a deep sense of entitlement. | |

| Behavior Level | Behaviors | Manager/Supervisor's Guidelines for Action |
|---|---|---|
| | Have an obsession with weapons and empathy with those who resort to violence | |
| Level III | **The employee may:** | |
| | Make blatant threats to harm others and/or destroy property | Warn those who may be in immediate danger |
| | Carry a weapon on campus. | Immediately report the behavior to the next higher-level authority and press for quick intervention |
| | Engage in aggressive behavior such as verbal abuse and physical "in your face" posturing. | If the employee is present and seriously acting-out, call 9-1-1 and ask for assistance. |
| Level IV | **The employee may:** | |
| | Is violent toward others or property Displays overt acts of violence or out-of-control behavior | Call 9-1-1 for immediate assistance. |
| | | Attempt to get others out of harm's way. |
| | May or may not use a weapon or cause death | Inform the next higher-level authority. |