

# WORKPLACE VIOLENCE PREVENTION PROGRAM WVPP EXCEL-LIN THERAPY SOLUTIONS

Our business 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: June 18, 2024**

**Date of Last Revision(s): June 18, 2024**

## PURPOSE

The purpose of the Workplace Violence Prevention Plan (WVPP) is to have a clearly understood, accessible, and actionable policy to respond quickly to episodes of workplace violence. The WVPP compliments our policies and procedures by laying out more specifically the steps to identify, report, track, and analyze violent incidents to reduce the likelihood of re-occurrence.

## BACKGROUND – CALIFORNIA SENATE BILL 553

California Senate Bill 553 (SB 553) requires California workplaces to have a policy in place to address the rising episodes of violence occurring at the workplace and/or worksite. SB 553 has multiple requirements of an employer which can be broadly grouped into two categories: pre-violent incident activities and post-violent incident activities. The details of both categories are presented in greater detail in the following WVPP.

## GOAL OF THE WORKPLACE VIOLENCE PREVENTION PLAN

The goal of establishing a Workplace Violence Prevention Plan is to reduce violent incidents in the workplace at our contracted facilities and patient worksite of Home Health services. Ultimately, this will be achieved through improved employee and contractor awareness, violent incident identification and reporting, tracking of violent incidents, and corrective actions when hazards are recognized.

## DEFINITIONS

Although there are different definitions and/or interpretations of “violence,” for purposes of reporting and analyzing events, the Workplace Violence definitions as set forth in SB 553 are included below and are used consistently throughout training and reporting materials.

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

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

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

# WORKPLACE VIOLENCE PREVENTION PROGRAM WVPP

## EXCEL-LIN THERAPY

### SOLUTIONS

**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 or contract home health assignments.

**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 by Strangers** - 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 by Customers/Patients** - Workplace violence directed at employees by customers, clients, patients, students, inmates, or visitors.

**Type 3 Violence by Current or Past Coworkers** - Workplace violence against an employee by a present or former employee, supervisor, or manager.

**Type 4 Violence by someone with Personal Relations with an Employee / Contractor** - 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.

Violence may include not only acts of violence but also threats to commit violence or do harm. Workplace violence includes any conduct, verbal or physical, in person or virtual, which causes another to reasonably fear for their own personal safety or that of their

# **WORKPLACE VIOLENCE PREVENTION PROGRAM WVPP EXCEL-LIN THERAPY SOLUTIONS**

immediate family.

# WORKPLACE VIOLENCE PREVENTION PROGRAM WVPP

## EXCEL-LIN THERAPY

## SOLUTIONS

### EDUCATION, TRAINING, AND COMMUNICATION

Creating a workplace environment to both recognize and reduce workplace violence will take continuous education and recognition of diligent safety practices and behaviors that reduce hazards. Ongoing engagement with the WVPP by managements, supervisors, staff and contractors can assist with plan compliance.

#### Education and Training

**SB 553** requires all employees / contractor to complete an annual mandatory workplace violence training and instruction that is clear, understandable, and effective. Human Resources developed a training video for all employees / contractors that includes an understanding of what a violent incident is, how to elevate for attention and help, and what the role of the supervisor is in completing a violent incident report. The company-wide training is meant to be a general overview and is not site-specific. Departments are expected to supplement the training video for all employees with site and/or role specific training and education.

#### Communication

The company will maintain ongoing open communications with employees and contractors about safety concerns and will review the WVPP at a high level with employees and contractors at least annually. Ongoing communications can be met via regularly scheduled meetings, newsletters, emails, or bulletins.

Beyond the initial and annual training for all employees on WVPP, departments are expected to have ongoing effective communication with employees related to the topic of workplace violence. This can include reinforcing a culture that encourages reporting of violence incidents without fear of retaliation, addressing employees concerns around violence, and any post-event investigations yielding corrective actions that could reduce violent incidents.

The vehicle of communication can be in-person, or virtual, and can include staff meetings, newsletters, town hall gatherings, or staff bulletins. These communications also serve to bring timely updates to employees / contractors when changes in processes have been identified after a violent incident investigation to prevent future episodes.

If changes are made in the WVPP after an incident analysis, these updates must be shared with employees and contractors, designee in a timely manner.

For management and Human Resources: Management and HR need familiarity with the incident report (Addendum A) and should be provided with specific training to review the incident report, how to complete it, and the timelines for completion. Management and HR are required to complete the Violent Incident Report with the affected employee or contractor before submitting it to the HR office for investigation and report completion.

# WORKPLACE VIOLENCE PREVENTION PROGRAM WVPP EXCEL-LIN THERAPY SOLUTIONS

## MANAGEMENT RESPONSIBILITY

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

Managers and supervisors are responsible for providing a secure work environment for staff and contractors, including the identification of security risks, staff and contractor training needs, the development and management of departmental security policies and procedures, and incident reporting, investigation, and follow up.

The WVPP administrator, **President / Owner or his designee**, has the authority and responsibility for implementing the provisions of this plan for Excel-Lin Therapy Solutions. If there are multiple people responsible for the plan, their roles will be clearly described.

### Contacts

Responsible Persons	Job Title/Position	WVPP Responsibility(ies)	Phone #	Email
Donny Lin	Owner / CEO	<b>[Overall responsibility for the plan; Donny Lin approves the final plan and any major changes.]</b>	(714) 271-7578	excellintherapysolutions@gmail.com]
Michael Lodge Lodge & Co.	<b>Designee</b> Accounting and HR Contractor	<b>[Responsible for employee involvement and training; Michael Lodge organizes safety meetings, updates training materials, and handles any reports of workplace violence.]</b>	(818) 619-9788	mlodge@lodge-co.com]

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

# WORKPLACE VIOLENCE PREVENTION PROGRAM WVPP

## EXCEL-LIN THERAPY SOLUTIONS

### EMPLOYEE / CONTRACTOR ACTIVE INVOLVEMENT

**Excel – Lin Therapy Solutions** 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 / contractor and authorized employee representatives to participate in:
  - Identifying, evaluating, and determining corrective measures to prevent workplace violence. All managers and supervisors are responsible for implementing and maintaining the WVPP in their work and patient areas and for answering employee / contractor questions about the WVPP.
  - Managers and supervisors are responsible for providing a secure work environment for their staff and Home Health Contractors, including the identification of security risks, staff and contractor training needs, the development and management of departmental security policies and procedures, and incident reporting, investigation and follow up.
  - Supervisors are responsible for completing the Violent Incident Report with the affected employee or contractor before submitting to Human Resources for investigation and violent incident log completion.
  - Designing and implementing training for all employees and contractors, education includes a process to confirm annual completion of required Excel-Lin Therapy Solutions violent incident identification and reporting. This can include annual reports on employee / contractor completion performed by Human Resources and/or a designee. Which will include:
    - A review of site-specific emergency preparedness procedures (link to materials; this may include many different locations, and each should be listed and linked to an appropriate emergency plan.
    - Site-specific violent incident trainings beyond what is covered. Links are provided at [www.excel-lin.com](http://www.excel-lin.com) WVPP page.
  - Department-specific training for supervisors on the incident report (Addendum A), how to complete the report after an incident occurs, and the timeliness for completion.
  - Reporting and investigating workplace violence incidents.
- 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.

# **WORKPLACE VIOLENCE PREVENTION PROGRAM WVPP EXCEL-LIN THERAPY SOLUTIONS**

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

Each employee and contractor are required to attend workplace violence training annually. Employees and contractors must feel comfortable identifying a violence issue and elevating it for attention and support.

Employees and contractors, once aware of violence, are encouraged to report any threats or acts of workplace violence within 24 hours from time of knowledge of the incident. Employees and contractors must be able to inform management about workplace hazards or threats of violence without fear of reprisal or adverse action.

Employees and contractors shall refer any questions regarding their rights and obligations under this policy to their immediate supervisor.

# **WORKPLACE VIOLENCE PREVENTION PROGRAM WVPP EXCEL-LIN THERAPY SOLUTIONS**

## **ELEVATION OF AN INCIDENT**

Appropriate elevation and response need to be determined at the time of the incident, whether it is an in-person event or a threat of future harm. With any incident, employee and contractor safety is of the highest importance. Elevation and response mechanisms can include the employee or contractor leaving the area, calling for help, or, with a more imminent threat, calling 9-1-1. The employee or contractor must share the specifics of the violent incident with a manager or human resources.

The Manager or Human Resources (designee) may need to elevate the violent incident issue an attorney, government or civil.

Next steps could include seeking a restraining order (RO). Ros can be used both in response to a current violent incident and in prevention of a violent incident. In the setting of a credible threat of violence, a RO may be used preventatively to avoid a violent incident. Credible threats of violence can result from a pattern of behavior, or from a one-time situation.

## **VIOLENT INCIDENT REPORT**

The Violent Incident Report shall be completed by the individual's immediate supervisor or by the owner of the company or his/her designated individual or firm.

If the incident involves a contractor, it should be completed by the owner of the company or his/her designated individual or firm.

Prior to proceeding with any formal investigation, the management level individual and/or designated individual/firm shall report any incidents of threats or acts of physical violence to Human Resources. The Violent Incident Report should be completed as quickly as possible while the details of the event are still current, ideally within 24 hours. The report is mainly data collection, so creating a culture and environment where an employee is comfortable coming forward to report a violent incident is crucial. If the incident is between an employee or contractor and their supervisor, the HR representative must complete the report. Please review Addendum A.



# WORKPLACE VIOLENCE PREVENTION PROGRAM WVPP

## EXCEL-LIN THERAPY SOLUTIONS

### VIOLENT INCIDENT INVESTIGATION

The Manager, or Designee are required to complete the incident investigation in a timely manner, such as within seven (7) calendar days. Addendum B includes the materials, questions, and required analysis. As required by SB 553, completed reports should be made available to the employee or contractor within 15 days from the date of the request.

#### **Procedures for investigating workplace violent incidents may include the following:**

- A visit to the incident scene as soon as possible.
- Interviews of threatened or injured workers / contractors and witnesses.
- Examination of the workplace for factors associated with workplace security, including any previous reports of inappropriate behavior by the perpetrator.
- Determination of the cause of the violent incident.

### VIOLENT INCIDENT LOG COMPLETION

Complete the incident log (Addendum C) with the details required, and forward to HR at [excellintherapysolutions@gmail.com](mailto:excellintherapysolutions@gmail.com) after completion of the investigation. Identifying a record number (as shown with an example in addendum C) instead of employee names allows tracking while protecting confidentiality. The log and supporting materials should be audit ready.

### POST INCIDENT REPORT AND ANALYSIS

The intent of the log is to identify trends and opportunities for further hazard reduction. The log should be reviewed by HR at least annually, or sooner if there are more frequent incidents of workplace violence. Per SB 553, the log data must be maintained for a minimum of five (5) years.

### WORKPLACE HAZARD CORRECTION

The ongoing reporting and tracking of violent incidents support the identification of trends and the potential for hazard reduction or mitigation. Hazards that are identified with potential solutions will be addressed and implemented in a timely manner. If corrections are significant enough, they may require an update and modification to the current WVPP. Such updates to the WVPP must be brought to the attention of all employees and contractors in a timely manner.

# **WORKPLACE VIOLENCE PREVENTION PROGRAM WVPP EXCEL-LIN THERAPY SOLUTIONS**

## **RECORDKEEPING**

SB 553 has several requirements of recordkeeping that must be followed. The documentation of completion of the annual training by all employees / contractors must be maintained for at least one (1) year following the date of completion. The retention of violent incident reports and investigations must be maintained for five (5) years following the year of incident. The violent incident logs must be maintained for at least five (5) years following the year of incidents.

Records should be maintained, including workplace security and hazard assessments and inspections (including the person(s) or persons conducting the inspection), the workplace security concerns that have been identified, and the actions taken to correct the identified concerns.

## **COMPLIANCE**

Our system to ensure that employees / contractors 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:

Employee's and Contractors will ensure that all workplace security policies and procedures are clearly communicated and understood by all affected workers. The Human Resources WVPP will be made accessible on the company internet to allow further education. Managers and supervisors will enforce the rules fairly and uniformly.

Annual completion of education and training by all employees and contractors is required to re-enforce best practices for violence prevention. All workers will follow all workplace security directives, policies, and procedures, and assist in maintaining a safe work environment.

Failure to comply with the Workplace Violence Prevention Plan (WVPP) and/or the policy prohibiting employee violence in the workplace may result in employee discipline up to and including termination as well as criminal prosecution.

## **ANNUAL WVPP REVIEW**

Annual review of the WVPP includes confirming accessibility to the plan and assessing its effectiveness and overall employee compliance with the processes outlined in the WVPP. This includes updates and new procedures if improvements can be identified that would reduce workplace violent incidents. The whole plan should be reviewed at least annually or more often if there are violent incidents.

# WORKPLACE VIOLENCE PREVENTION PROGRAM WVPP

## EXCEL-LIN THERAPY SOLUTIONS

### EMERGENCY RESPONSE PROCEDURES

Excel-Lin Therapy Solutions has in place the following specific measures to handle actual or potential workplace violence emergencies:

- Effective means to alert employees of the presence, location, and nature of workplace violence emergencies by the following:

**FACILITY ASSIGNMENT (PT/PTA/OT/OTA/ST)**

In the event you are faced with a workplace incident of violence or threat of violence, by a patient, patient family member, intruder, or staff of the facility, you are to make an immediate call to management of Excel-Lin Therapy Solutions or HR. Call 911 if you feel this is a serious violence incident. Please see Responsible Person List. **Make sure you are in a safe place.**

Follow the facilities emergency response procedures. Contact a security guard if on duty or the administrator or director of nurses to report an incident.

Work with facility management on Alarm systems and PA announcements will be used to alert employees of emergencies (The alarms could be audible alarms, visual alarms, or both.)

Fill out a violent incident report, take pictures of anything that substantially shows a threat or an actual attack. Submit any documentation (police reports), pictures with the violence incident report.

**HOME HEALTH VISIT (PT/PTA/OT/OTA)**

In the event of an incident the visiting Physical Therapist (& PTA) or Occupational Therapist (& OTA) will leave the patient worksite and go to a safe place and call the Manager or HR call and report the incident, determine if you feel safe and if law enforcement needs to be called in.

- How to obtain help from staff, security personnel, or law enforcement. Human Resource Designee In the event of an emergency, including a Workplace Violence Emergency, contact the following:

Responsible Persons	Job Title/Position	WVPP Responsibility(ies)	Phone #	Email
Donny Lin	Owner	<b>[Responsible for emergency response, hazard identification, and coordination with other employers; Semore conducts safety inspections, coordinates emergency response procedures, and communicates with other</b>	714-271.7578	Excel-lintherapysolutions@gmail.com

# WORKPLACE VIOLENCE PREVENTION PROGRAM WVPP EXCEL-LIN THERAPY SOLUTIONS

		<i>entities about the plan.]</i>		
--	--	----------------------------------	--	--

<b>Responsible Persons</b>	<b>Job Title/Position</b>	<b>WVPP Responsibility(ies)</b>	<b>Phone #</b>	<b>Email</b>
Michael Lodge	HR Designee	<b>[Responsible for emergency response, hazard identification, and coordination with other employers; Semore conducts safety inspections, coordinates emergency response procedures, and communicates with other entities about the plan.]</b>	818-619-9788	mlodge@lodge-co.com

# WORKPLACE VIOLENCE PREVENTION PROGRAM WVPP EXCEL-LIN THERAPY SOLUTIONS

## WORKPLACE VIOLENCE HAZARD IDENTIFICATION AND EVALUATION

The following policies and procedures are established and required to be conducted by Excel-Lin Therapy Solutions 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:

- Daily or weekly review of all submitted and reported concerns.
- Workplace Violence Hazards suggestion box
- Online form for reporting workplace violence hazards
- Voicemail/email/text messages

### 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: once per quarter or as needed based on frequency of incidents.

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:

<b>Specific Person Name/Job Title</b>	<b>Area/Department/Specific location</b>
Michael Lodge	HR Designee

# WORKPLACE VIOLENCE PREVENTION PROGRAM WVPP

## EXCEL-LIN THERAPY

### SOLUTIONS

#### **Inspections for workplace violence hazards include assessing:**

- The exterior and interior of the workplace for its attractiveness to violence / criminal activity.
- The need for violence surveillance measures that would be applicable to the worksite.
- Procedures for employee response during a robbery, attack or other criminal act, including our policy prohibiting employees, who are not security guards, from confronting violent persons or persons committing a criminal act.
- Procedures for reporting suspicious persons or activities.
- Effective location and functioning of emergency buttons and alarms, if applicable to the worksite.
- Posting of emergency telephone numbers for law enforcement, fire, and medical services.
- Whether employees / contractors have access to a telephone with an outside line.
- Whether employees / contractors have effective escape routes from the workplace.
- Whether employees / contractors 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.
- Frequency and severity of threatening or hostile situations that may lead to violent acts by persons who are service recipients of our establishment.
- Employees' skill in safely handling threatening or hostile service recipients (example: security guards).
- 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.
- The use of work practices such as the "buddy" system for specified emergency events.
- The availability of employee / contractor escape routes.
- How well our establishment's management / employees / contractors communicate with each other.
- Access to and freedom of movement within the workplace by non-employees, including

# **WORKPLACE VIOLENCE PREVENTION PROGRAM WVPP**

## **EXCEL-LIN THERAPY**

### **SOLUTIONS**

recently discharged employees or persons with whom one of our employees / contractors is having a dispute.

- Frequency and severity of employees / contractors' 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.
- Look at workspaces, reviewing the doors to escape from, working on patients or other employees where the patient or employee is not blocking the escape route. Employees or contractor should always be the closest to the nearest door, do not let patients or other individuals block your escape routes.

# **WORKPLACE VIOLENCE PREVENTION PROGRAM WVPP EXCEL-LIN THERAPY SOLUTIONS**

## **WORKPLACE VIOLENCE HAZARD CORRECTION**

Workplace violence hazards will be evaluated and corrected in a timely manner Excel-Lin Therapy Solutions 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) / contractor(s) will be removed from the situation except those necessary to correct the existing condition. Employees / contractors necessary to correct the hazardous condition will be provided with the necessary protection. This pertains to Physical Therapists, PT Assistants, Occupational Therapists, OT Assistants.
- 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.

## **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 facility or patient (family).
- Determine the cause of the incident.
- Take corrective action to prevent similar incidents from occurring.
- Record the findings and ensure 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.



# WORKPLACE VIOLENCE PREVENTION PROGRAM WVPP

## EXCEL-LIN THERAPY

### SOLUTIONS

- A detailed description of the incident.
- A classification of who committed the violence, including whether the facility or patient, family or friend of a facility or patient, 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 incidents where there is an intent to cause physical, mental, or verbal threats of violence.
- Consequences of the incident, including, but not limited to:
  - Whether security or 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 (These resources could include referrals to counseling services, information about employee assistance programs, and time off work if necessary.)

# **WORKPLACE VIOLENCE PREVENTION PROGRAM WVPP EXCEL-LIN THERAPY SOLUTIONS**

Ensure that no personal or contractors 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.

# WORKPLACE VIOLENCE PREVENTION PROGRAM WVPP

## EXCEL-LIN THERAPY SOLUTIONS

### 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 was first established.
- Annually to ensure all employees / contractors 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.

Management, HR designee, or outside firm 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 Human Resources] 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.
- Opportunities Excel-Lin Therapy Solutions has for interactive questions and answers with a person knowledgeable about the Excel-Lin Therapy Solutions 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.

# WORKPLACE VIOLENCE PREVENTION PROGRAM WVPP EXCEL-LIN THERAPY SOLUTIONS

- Employee routes of escape.
- Emergency medical care provided in the event of any violent act upon an employee
- Post-event trauma counseling for employees desiring such assistance.

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

# WORKPLACE VIOLENCE PREVENTION PROGRAM WVPP EXCEL-LIN THERAPY SOLUTIONS

## EMPLOYEE ACCESS TO THE WRITTEN WVPP

Excel-Lin Therapy Solutions 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 / contractor or designated representative agrees to receive an electronic copy.

## RECORDKEEPING

Excel-Lin Therapy Solutions 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.

## EMPLOYEE / CONTRACTOR ACCESS TO RECORDS

The following records shall be made available to employees / contractors 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.

# **WORKPLACE VIOLENCE PREVENTION PROGRAM WVPP EXCEL-LIN THERAPY SOLUTIONS**

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

The Excel-Lin Therapy Solutions 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 Excel-Lin Therapy Solutions 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.]

**WORKPLACE VIOLENCE PREVENTION PROGRAM WVPP  
EXCEL-LIN THERAPY  
SOLUTIONS**

XX

**VIOLENT INCIDENT REPORT  
Addendum A**

XX

**Violent Incident Report Instructions**

The supervisor receiving a report of workplace violence must complete this form with as much detail as possible to support an investigation. The original report must be forwarded through all appropriate levels to the Human Resources Department or their Designee. The department must maintain the original form. Human Resources will maintain a copy.

**Employee Information**

Reporting Employee / Contractor: \_\_\_\_\_  
Affected Employee(s) / Contractor: \_\_\_\_\_  
Affected Employee(s) / Contractor Job Title \_\_\_\_\_  
Facility / Patient Address: \_\_\_\_\_

**Incident Information**

Date incident occurred: \_\_\_\_\_  
Time incident occurred: \_\_\_\_\_

Specific address and detailed description of the incident and where incident occurred (i.e. empty hallway, patients room, patients home, bathroom):

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

# WORKPLACE VIOLENCE PREVENTION PROGRAM WVPP EXCEL-LIN THERAPY SOLUTIONS

## Checklist of Questions to Answer After a Violent Incident

### 1. Which type of person threatened or assaulted the Employee(s) or Contractor(s)

- Type 1:    \_\_\_ Stranger  
              \_\_\_ Known  
              \_\_\_ Other
- Type 2:    \_\_\_ HH Patient  
              \_\_\_ Facility Patient  
              \_\_\_ Visitor
- Type 3:    \_\_\_ Current Co-worker  
              \_\_\_ Former Co-worker  
              \_\_\_ Supervisor / Manager
- Type 4:    \_\_\_ Current Spouse or Partner  
              \_\_\_ Former Spouse or Partner  
              \_\_\_ Employee(s) / Contractor(s) Friend  
              \_\_\_ Employee(s) / Contractor(s) Relative  
              \_\_\_ Family/friend of client or patient

### Definitions of Violent Incident Types

**Type 1 Violence by Strangers** - 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 by Customers/Patients** - Workplace violence directed at employees by customers, clients, patients, students, inmates, or visitors.

**Type 3 Violence by Current or Past Coworkers** - Workplace violence against an employee by a present or former employee, supervisor, or manager.

**Type 4 Violence by someone with Personal Relations with an Employee** - 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 PREVENTION PROGRAM WVPP  
EXCEL-LIN THERAPY  
SOLUTIONS**

2. What type of violent incident occurred (check all that apply)?

- |   |   |
|---|---|
| <input type="checkbox"/> Verbally harassed    | <input type="checkbox"/> Chocked                |
| <input type="checkbox"/> Verbally Threatened  | <input type="checkbox"/> Kicked                 |
| <input type="checkbox"/> Physically Assaulted | <input type="checkbox"/> Bitten                 |
| <input type="checkbox"/> Punched              | <input type="checkbox"/> Hit with Object        |
| <input type="checkbox"/> Slapped              | <input type="checkbox"/> Threatened with Weapon |
| <input type="checkbox"/> Grabbed              | <input type="checkbox"/> Assaulted with Weapon  |
| <input type="checkbox"/> Pushed               | <input type="checkbox"/> Animal Attack          |
| <input type="checkbox"/> Other _____          |   |

3. Was a weapon used?       Yes     No

Describe the weapon used in the incident::

---

---

4. Was/were the employee(s) / Contractor working along?     Yes     No  
If not, who was/were with the employee(s) or Contractor(s) (that may have witnessed the incident?)

---

---

5. Were there threats made before the incident occurred?     Yes     No

If yes, was it ever reported to the employee(s) supervisor or Human Resources that the employee(s) or contractor(s) was/were threatened, harassed, or was/were suspicious that the attacker may become violent?

---

---

6. Are you willing to testify against the Respondent in Court to obtain a restraining order?       Yes     No

**WORKPLACE VIOLENCE PREVENTION PROGRAM WVPP  
EXCEL-LIN THERAPY  
SOLUTIONS**

**Reporter Information**

Report Completed by: \_\_\_\_\_  
Title: \_\_\_\_\_  
Date: \_\_\_\_\_ Phone number: \_\_\_\_\_  
Email: \_\_\_\_\_

**WORKPLACE VIOLENCE PREVENTION PROGRAM WVPP  
EXCEL-LIN THERAPY  
SOLUTIONS**

XX

**VIOLENT INCIDENT INVESTIGATION  
Addendum B**

XX

The Human Resources Department / Designee will complete the investigation into the violent incident. Further investigation and resolution of the incident is expected within seven (7) days in addition to submitting a copy of the completed investigation to Human Resources / Designee.

Incident Analysis To Be Completed by Human Resources / Designee

Has this type of incident occurred before at the workplace?    \_\_\_    Yes    \_\_\_    No  
What were the main factors that contributed to the incident?

---



---



---

What could have prevented or at least minimized the damage caused by this incident?

---



---



---

**Post-Incident Response**

- \_\_\_ Yes \_\_\_ No Did the employee(s)/Contractor require medical attention as a result of the incident?
- \_\_\_ Yes \_\_\_ No Did the employee(s) miss work as a result of the incident?
- \_\_\_ Yes \_\_\_ No Did the employee(s) apply for workers' compensation?
- \_\_\_ Yes \_\_\_ No Was security contacted?
- \_\_\_ Yes \_\_\_ No Was immediate counseling provided to affected workers and witnesses?
- \_\_\_ Yes \_\_\_ No Was critical incident debriefing provided to all affected staff / contractors who desired it?
- \_\_\_ Yes \_\_\_ No Was post-trauma counseling provided to affected staff who desired it?
- \_\_\_ Yes \_\_\_ No Was all counseling provided by a professional counselor?

**WORKPLACE VIOLENCE PREVENTION PROGRAM WVPP  
EXCEL-LIN THERAPY  
SOLUTIONS**

Has there been follow-up with the employee(s)/Contractor(s)  Yes  No  
Are there modifications to be made to WVPP to reflect updated practices?  
 Yes  No

Describe updates to WVPP \_\_\_\_\_

Investigation completed by: \_\_\_\_\_

Job Title: \_\_\_\_\_

Date: \_\_\_\_\_ Phone number: \_\_\_\_\_

Email: \_\_\_\_\_

# WORKPLACE VIOLENCE PREVENTION PROGRAM WVPP EXCEL-LIN THERAPY SOLUTIONS

## VIOLENT INCIDENT LOG AND INSTRUCTIONS Addendum C

Every workplace violence incident is reported and recorded in a violent incident log. Any element of personal identifying information sufficient to allow identification of any person involved in a violent incident will NOT be recorded. Such personal identifying information includes the person's name, address, electronic mail address, telephone number, social security number, or any information that, alone or in combination with other publicly available information, could reveal the person's identity.

Upon receipt of report, Human Resources or designee assigns a number system for tracking including date of report, Department or place of worksite, initials of who completed the log entry, without including employee name. Tracking and trending should include date, time and location, violence type, type of assault, and incident detailed description.

**It is expected that the logs will be forwarded to Human resources or designee and make improvements to prevent further incidents.**

Human Resources or designee are expected to review the data at least quarterly and make improvements to prevent further incidents.

Log #	Person who completed the Log	Incident Date #####	Incident Time (24 hour, military)	Physical Location	Violence Perpetrator(s) Type, e.g., 1 stranger; 2 client, 3 employee/contractor (current or former), 4	Incident Type, e.g. Verbal threats, physical attack	Police Notified Y/N
HR 1234	Giano Bito	#####	1403	15 Van Ness, 4th Floor	3	Verbal	Y

**WORKPLACE VIOLENCE PREVENTION PROGRAM WVPP  
EXCEL-LIN THERAPY  
SOLUTIONS**

**EMPLOYEE / CONTRACTOR ACKNOWLEDGEMENT**

I have read the WVPP and will adhere to the program to the best of my ability.

---

Employee / Contractor Signature

---

Date

This will be placed in your WVPP file.