

California Workplace Violence Prevention Plan

Document change record

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Covered employees

This Workplace Violence Prevention Plan (WVPP) applies to Pyramid Consulting Inc. (Pyramid) employees and consultants working from a Pyramid office or client facility in California.

Consultants who work from a client facility are expected to comply with the client’s published policy and procedures for the building in which they work, and report any hazards to both Pyramid and the client’s designated WVPP Administrator.

Workplace violence prevention policy

Pyramid has a zero-tolerance policy for violent acts or threats of violence against our employees, applicants, clients / customers or vendors. This Workplace Violence Prevention Plan (WVPP) addresses the hazards known to be associated with the four types of workplace violence as defined by California Labor Code (LC) section 6401.9.

Workplace violence describes any act of violence or threat of violence that occurs in a place of employment 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.

There are four workplace violence types:

1. **Type 1 violence** — Workplace violence committed by a person who has no legitimate business at the worksite, and includes violent acts by anyone who enters the workplace or approaches employees with the intent to commit a crime.
2. **Type 2 violence** — Workplace violence directed at employees by customers, clients, patients, students, inmates, or visitors.

3. **Type 3 violence** — Workplace violence against an employee by a present or former employee, supervisor, or manager.
4. **Type 4 violence** — Workplace violence committed in the workplace by a person who does not work there, but has or is known to have had a personal relationship with an employee.

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

Responsibility

The WVPP administrator, the Head of Human Resources, has the authority and responsibility for implementing the provisions of this plan, including employee involvement, training, emergency response, and hazard identification.

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

Employee active involvement

Pyramid 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 have quarterly safety meetings with employees and their representatives to discuss identification of workplace violence related concerns/hazards, evaluate those hazards and/or concerns, and how to correct them. These meetings could involve brainstorming sessions, discussions of recent incidents, and reviews of safety procedures.
- Each Consultant Care Associate (CCA) will connect with consultants monthly to discuss any concerns they have with client facilities where they work.
- Employees are encouraged to participate in designing and implementing training programs, and their suggestions will be incorporated into the training materials.
- All employees must report workplace violence incidents to their CCA or other HR Representative.
- Management will ensure that all workplace violence policies and procedures within this written plan are clearly communicated and understood by all employees. Managers and supervisors will enforce the rules fairly and uniformly.
- All employees will follow all workplace violence prevention plan directives, policies, and procedures, and assist in maintaining a safe work environment. Consultants working at a client workplace will comply with the WVPP as directed by the client.
- The plan shall be in effect at all times and in all work areas and be specific to the hazards and corrective measures for each work area and operation.

Employee compliance

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

- Training employees, supervisors, and managers in the provisions of Pyramid's WVPP.
- Provide retraining to employees whose safety performance is deficient with the WVPP.
- Recognizing employees who champion the WVPP in the workplace in company publications, such as newsletters or the intranet site.
- Discipline employees for failure to comply with the WVPP which may include termination of employment.

Workplace violence incident reporting procedure

Employees must report any threats or acts of workplace violence are reported to their supervisor or manager, who will inform the WVPP administrator. Employees may also report incidents directly to the WVPP administrator, or any member of the HR team.

In addition to notifying their Pyramid CCA, consultants who work at a client location must also report any threats or acts of workplace violence according to the client's published policy.

A strict non-retaliation policy is in place, and any instances of retaliation are dealt with swiftly and decisively. Any actions of retaliation by an employee will result in disciplinary action, including termination.

Emergency response procedures

In the event of an active threat of violence in a Pyramid office, employees present in the workplace will be notified in person by HR and / or their manager. Employees not present will be informed of potential threats by phone or email.

If evacuation from the building is necessary, stay calm, do not rush, and do not panic. Gather your personal belongings only if safe to do so and proceed to the nearest exit. Notify other employees as you are exiting the building and assemble in a safe area.

In the event of a life-threatening emergency, employees should dial 911.

Periodic inspections

Periodic inspections of workplace violence hazards will identify unsafe conditions and work practices. Quarterly inspections to identify and evaluate workplace violence and hazards will be performed by the CHRO's designated representative.

Inspections for workplace violence hazards include assessing:

- Procedures for employee response during a 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.
- Whether employees have effective escape routes from the workplace.
- Whether employees have a designated safe area where they can go to in an emergency.
- Adequacy of workplace security systems, such as door locks, entry codes or badge readers, security windows, physical barriers, and restraint systems.
- The availability of employee escape routes.
- Frequency and severity of employees' reports of threats of physical or verbal abuse by managers, supervisors, or other employees.
- Any prior violent acts, threats of physical violence, verbal abuse, property damage or other signs of strain or pressure in the workplace.

Workplace violence hazard correction

Workplace violence hazards will be evaluated and corrected in a timely manner. If an imminent workplace violence hazard exists that cannot be immediately abated without endangering employee(s), all exposed employee(s) will be removed from the situation except those necessary to correct the existing condition. Corrective measures for workplace violence hazards may include:

- Provide / review employee, supervisor, and management training on emergency action procedures.
- Control, access to, and freedom of movement within, the workplace by non-employees, include recently discharged employees or persons with whom one of our employees is having a dispute.
- Provide employee training / re-training(refreshers) on the WVPP, which could include but not limited to the following:
 - Recognizing and handling threatening or hostile situations that may lead to violent acts by persons who are service recipients of our establishment.
 - Ensure that 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 person making the threat.
 - Procedures for reporting suspicious persons, activities, and packages.

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.
- Examine the workplace for security risks associated with the incident, including any previous reports of inappropriate behavior by the perpetrator.
- Determine the cause of the incident.
- Take corrective action to prevent similar incidents from occurring.
- Record the findings and 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:
 - The date, time, and location of the incident.
 - The workplace violence type or types involved in the incident.
 - A detailed description of the incident.
 - A classification of who committed the violence, including whether the perpetrator was a client or customer, family or friend of a client or customer, stranger with criminal intent, coworker, supervisor or manager, partner or spouse, parent or relative, or other perpetrator.
 - A classification of circumstances at the time of the incident, including, but not limited to, whether the employee was completing usual job duties, working in poorly lit areas, rushed, working during a low staffing level, isolated or alone, unable to get help or assistance, working in a community setting, or working in an unfamiliar or new location.
 - A classification of where the incident occurred, such as in the workplace, parking lot or other area outside the workplace, or other area.
 - The type of incident, including, but not limited to, whether it involved any of the following:
 - Physical attack without a weapon, including, but not limited to, biting, choking, grabbing, hair pulling, kicking, punching, slapping, pushing, pulling, scratching, or spitting.
 - Attack with a weapon or object, including, but not limited to, a firearm, knife, or other object.
 - Threat of physical force or threat of the use of a weapon or other object.
 - Sexual assault or threat, including, but not limited to, rape, attempted rape, physical display, or unwanted verbal or physical sexual contact.

- 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.
- The violent incident log should not include any personally identifiable information about anyone involved in a violent incident.

Training and instruction

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

- When the WVPP is first established.
- Annually to ensure all employees understand and comply with the plan.
- Whenever a new or previously unrecognized workplace violence hazard has been identified and when changes are made to the plan. The additional training may be limited to addressing the new workplace violence hazard or changes to the plan.

Pyramid will provide its employees with training and instruction on the following:

- How to obtain a copy of the WVPP, and how to participate in development and implementation of the 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 Pyramid 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 Pyramid has for interactive questions and answers with a person knowledgeable about the plan.
- 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.

Employee access to the written WVPP

Pyramid ensures that the WVPP shall be in writing and shall be available and easily accessible to employees, authorized employee representatives, and representatives of Cal / OSHA at all times. Covered Employees and Consultants will receive a copy of the plan, which can also be retrieved from Pyramid's intranet site.

Recordkeeping

Pyramid 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 access to records

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

- Records of workplace violence hazard identification, evaluation, and correction.
- Training records.
- Violent incident logs.

Review and revision of the WVPP

The Pyramid 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 soliciting the active involvement of employees and authorized employee representatives in reviewing the plan's effectiveness. The review will include a review of incident investigations and the violent incident log, as well as an assessment of whether violence risks are being properly identified, evaluated, and corrected. Any necessary revisions are made promptly and communicated to all employees. These revisions could involve changes to procedures, updates to contact information, and additions to training materials.

Employer reporting responsibilities

Pyramid will immediately report to Cal/OSHA any serious injury or illness (as defined by [CCR, Title 8, Section 330\(h\)](#)), or death (including any due to Workplace Violence) of an employee occurring in a place of employment or in connection with any employment.