



Workplace Violence Prevention Plan

Date of Last Review: July 1, 2024

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DEFINITIONS

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

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

Log - The violent incident log.

Plan - This workplace violence prevention plan.

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

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

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

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

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

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

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

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

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

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

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

RESPONSIBILITY

The Workplace Violence Prevention Plan (“WVPP”) administrator, Karen Caines, Chief People Officer, has the authority and responsibility for implementing the provisions of this plan for AlphaBEST.

Responsible Persons	Job Title/Position	WVPP Responsibility(ies)	Phone #	Email
Karen Caines	CPO	Overall responsibility for the plan; <i>Caines approves the final plan and any major changes.</i>	1-336-223-5443	kcaines@alphabest.org
Karen Caines Torrie Dunlap	CPO (Employee involvement) Chief Innovation Officer (Training)	Responsible for employee involvement and training; Caines ensures employment involvement of learning of this plan upon hire and Dunlap ensures that employees review it on a regular basis throughout employment as part of an annual training plan	1-336-223-5443 1-619-246-2729	kcaines@alphabest.org
Brian Heaton TBD - Open Position	Chief Operations Officer (COO) Risk Manager	Responsible for emergency response, hazard identification, and coordination with other employers; Heaton and Risk Manager <i>conduct safety inspections, coordinate emergency response procedures, and communicate with other employers about the plan.</i>	1-336-244-9149 <hr/>	bheaton@alphabest.org

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

Karen Caines 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 to participate in:
 - Monthly Meetings and/or Circulation of Materials - identifying, evaluating, and determining corrective measures to prevent workplace violence. Discussion of workplace violence concerns, evaluate hazards and evaluate how best to approach and correct them.

- Training – Employees will be involved in both the designing and implementation of training programs.
- 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.
- All employees will follow all workplace violence prevention plan directives, policies, and procedures, and assist in maintaining a safe work environment. This is in addition to and supplements the AlphaBEST Team Member Handbook.
- 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

All employees must comply with the rules and work practices that are designed to make the workplace more secure and not engage in threats or physical actions that create a security hazard for others in the workplace. These include:

- Training employees, supervisors, and managers in the provisions of AlphaBEST's WVPP.
- Email reporting, audits, and follow-up interviews to ensure that supervisory and nonsupervisory employees comply with the WVPP.
- Provide retraining to employees whose safety performance is deficient with the WVPP.
- Recognizing employees who demonstrate safe work practices that promote the WVPP in the workplace at monthly or quarterly employee meetings and/or notices to all employees.
- Utilization of AlphaBEST's progressive disciplinary process to discipline employees for failure to comply with the WVPP.

COMMUNICATION WITH EMPLOYEES

We recognize that open, two-way communication between our management team, staff, and other employees, about workplace violence issues is essential to a safe and productive workplace. The following communication system is designed to facilitate a continuous flow of workplace violence prevention information between management and staff in a form that is readily understandable by all employees, and consists of one or more of the following:

- New employee orientation includes workplace violence prevention policies and procedures.
- Workplace violence prevention training programs.
- Regularly scheduled meetings that address security issues and potential workplace violence hazards
- Active listening/communication training for all supervisors to enhance communications with employees.
- Posted or distributed workplace violence prevention information.
- Employees can report a violent incident, threat, or other workplace violence concern to AlphaBEST or law enforcement without fear of reprisal or adverse action. They can follow the standard "open door policy", as well as make reports to any member of management, or email WVPP@alphabest.org. Employees can also call or email the persons listed above in this WVPP.
- Employees will not be prevented from accessing their mobile or other communication devices to seek emergency assistance, assess the safety of a situation, or communicate with a person to verify their safety. Employees' concerns will be investigated in a timely manner and they will be informed of the

results of the investigation and any corrective actions to be taken. AlphaBEST's CPO is directly responsible for transparent communications and updates with employees.

- Reported incidents and the subsequent investigation and remedial action will be taken and used as training for all employees during subsequent employee meetings and training sessions.

COORDINATION WITH OTHER EMPLOYERS

AlphaBEST will implement the following effective procedures to coordinate the implementation of its plan with other employers to ensure that those employers and employees understand their respective roles, as provided in the plan.

- All employees will be trained in workplace violence prevention.
- Workplace violence incidents involving any employee are reported, investigated, and recorded.
- At a multiemployer worksite, AlphaBEST will ensure that if its employees experience a workplace violence incident, AlphaBEST will record the information in a violent incident log and shall also provide a copy of that log to the responsible party for its worksite.

WORKPLACE VIOLENCE INCIDENT REPORTING PROCEDURE

AlphaBEST will implement the following effective procedures to ensure that:

- All threats or acts of workplace violence are reported to an employee's supervisor or manager, who will inform the WVPP administrator. This will be accomplished either in person or by phone, and email. If that's not possible, employees will report incidents directly to the WVPP administrator, the Chief People Officer, Karen Caines.
- Employees can report incidents to their supervisor, HR, or through email at WVPP@alphabest.org.

A strict non-retaliation policy is in place, and any instances of retaliation are dealt with swiftly and decisively. If retaliation is alleged or possibly discovered, the offending employee shall be suspended pending investigation. If the retaliation is confirmed, the offending employee shall be terminated.

EMERGENCY RESPONSE PROCEDURES

AlphaBEST 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:
 - a. In a program setting, use the words "Code Red" over the walkie-talkies to indicate a workplace violence situation. Use the location if possible (ex. "Code Red- Cafeteria"). If walkie-talkies are not in use, pull the fire alarm to alert everyone in the building of an emergency.
 - b. In an office setting, use the PA system if available, or pull the fire alarm to alert everyone in the building of an emergency.
- AlphaBEST will have evacuation or sheltering plans. Each site location has its own maps of evacuation routes, locations of emergency exits, and instructions for sheltering in place.
- If there is immediate danger, call for emergency assistance by dialing 9-1-1) and then notify the WVPP Administrator. If there is no immediate danger, the non-emergency number for the police (found in the emergency preparedness procedures flipbook) should be called.

In the event of an emergency, including a Workplace Violence Emergency, contact the following:

Responsible Persons	Job Title/Position	WVPP Responsibility(ies)	Phone #	Email
TBD (Open Position)	Risk Manager	[Responsible for emergency response, hazard identification, and coordination with other employers;	TBD	TBD
Until this position is filled, contact the WVPP Administrator, Karen Caines			336-223-5443	kcaines@alphabest.org

WORKPLACE VIOLENCE HAZARD IDENTIFICATION AND EVALUATION

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

All submitted/reported concerns of potential hazards will be audited no less than monthly to ensure the WVPP is understood and is being followed.

Periodic Inspections

Periodic inspections of workplace violence hazards will take place no less than quarterly to identify unsafe conditions and work practices.

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

Specific Person Name/Job Title	Area/Department/Specific location
Area Managers	All program sites locations as part of the Site Observation Tool: Inspection for WVPP Compliance Section
Risk Manager	Inspection for WVPP Compliance Form

Inspections for workplace violence hazards include assessing:

- The exterior and interior of the workplace for its attractiveness to robbers.

- The need for violence surveillance measures, such as mirrors and cameras.
- Procedures for employee response during a criminal act.
- Procedures for reporting suspicious persons or activities.
- Effective location and functioning of emergency buttons and alarms.
- Posting of emergency telephone numbers for law enforcement, fire, and medical services.
- Whether employees have access to a telephone with an outside line.
- Whether employees have effective escape routes from the workplace.
- Whether employees have a designated safe area where they can go 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.
- The use of work practices such as the "buddy" system for specified emergency events.
- How well our establishment's management and employees communicate with each other.
- 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.
- 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. AlphaBEST will implement the following effective procedures to correct workplace violence hazards that are identified:

- If an imminent workplace violence hazard exists that cannot be immediately abated without endangering employee(s), all exposed employee(s) will be removed from the situation except those necessary to correct the existing condition.
- 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 and re-inspect the workplace for security risk factors associated with the incident, including any previous reports of inappropriate behavior by the perpetrator.
- Determine the cause of the incident.
- Take corrective action to prevent similar incidents from occurring.
- Record the findings and 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.
 - Animal attack.
 - Other.
 - 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.
- Remind employees and suggest a referral to the Employee Assistance Plan (EAP).

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

TRAINING AND INSTRUCTION

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

- When the WVPP is first established.
- 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.

AlphaBEST 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 the 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 AlphaBEST 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 AlphaBEST has for interactive questions and answers with a person knowledgeable about the AlphaBEST 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.
- Employee routes of escape.
- Emergency medical care is 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.*

EMPLOYEE ACCESS TO THE WRITTEN WVPP

AlphaBEST ensures that the WVPP plan shall be in writing and shall be available and easily accessible to employees, authorized employee representatives, and representatives of OSHA at all times. This will be accomplished by keeping an updated version of the WVPP accessible to all employees on the ADP Home Page. Hard copies are available to all team members by printing from ADP. If team members need assistance accessing a hard copy, the human resources team will provide the hard copy if requested from humanresources@alphabest.org.

RECORDKEEPING

AlphaBEST 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 a 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.**
- All records of workplace violence hazard identification, evaluation, and correction; training, incident logs, and workplace violence incident investigations required by law, shall be made available to 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 AlphaBEST 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:

Violent Incident Log

See Excel Spreadsheet