

GOLDEN RAIN FOUNDATION OF WALNUT CREEK

Workplace Violence Prevention Program

(September 11, 2024)

WORKPLACE VIOLENCE PREVENTION PROGRAM

POLICY

- It shall be the policy of the Golden Rain Foundation of Walnut Creek, further referenced as "Golden Rain Foundation, GRF or the Foundation" to provide all employees and members of the public with a safe and healthful work environment.
- It shall be the policy of the Foundation to take appropriate actions to protect, as fully as possible, all employees of the Foundation and members of the public from acts of violence, threats, intimidation, and harassment which may occur during the performance of job duties
- The Foundation shall also take action including involving state or local law enforcement and pursuing prosecution through judicial or other appropriate administrative remedies when such incidents occur.

PURPOSE

The purpose of the "Workplace Violence Prevention Program" (also referred to as the WVPP) is to ensure that the Golden Rain Foundation provides employees and members of the community with a place to conduct the business of this organization free of threats, intimidation, harassment, and acts of violence.

DEFINITIONS

- (1) "Emergency" means unanticipated circumstances that can be life threatening or pose a risk of significant injuries to employees or other persons.
- (2) "Engineering controls" mean an aspect of the built space or a device that removes a hazard from the workplace or creates a barrier between the worker and the hazard.
- (3) "Log" means the violent incident log required by this section.
- (4) "Plan" means the Workplace Violence Prevention Program required by this section.
- (5) "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.

- (6) (A) "Workplace violence" means any act of violence or threat of violence that occurs in a place of employment.
 - 1. (B) "Workplace violence" includes, but is not limited to, the following:
 - (i) 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.
 - (ii) 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.
 - (iii) The following four workplace violence types:
 - (I) "Type 1 violence," which means 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.
 - (II) "Type 2 violence," which means workplace violence directed at employees by customers, clients, patients, students, inmates, or visitors.
 - (III) "Type 3 violence," which means workplace violence against an employee by a present or former employee, supervisor, or manager.
 - (IV) "Type 4 violence," which means 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.
 - 2. (C) "Workplace violence" does not include lawful acts of self-defense or defense of others.
- (7) "Work practice controls" means procedures and rules which are used to effectively reduce workplace violence hazards.

RESPONSIBILITY

The Workplace Violence Prevention Program (WVPP) Program administrators for workplace security are the Public Safety Manager and Director of Human Resources. Together, they have the authority and responsibility for implementing the provisions of this program for the Foundation.

All managers and supervisors are responsible for implementing and maintaining the WVPP in their work areas and answering worker questions about the program. A copy of this program is available from each manager and supervisor.

All locations for GRF are required to maintain a WVPP in addition to the Injury and Illness Prevention Program (IIPP) as required by Cal/OSHA Title 8 Section 3203 and Senate Bill 553.

Manager/Supervisor - Managers and supervisors are responsible for ensuring compliance with the provisions of this Workplace Violence Prevention Program.

Employee - Employees are expected to act professionally, courteously, and responsibly at all times, which ensures compliance with the State of California's workplace violence policy requirements. It is the responsibility of each and every employee to immediately report any and all acts or threats, suspicious activity, and workplace violence to their immediate supervisor or manager or HR without fear of reprisal. This includes reports made to local law enforcement authorities. All reports must be taken seriously. The initial verbal report must be followed up with written documentation which should include the following critical information: Names of the involved parties (i.e. perpetrator, victim and witnesses), exactly what occurred, when the incident occurred, where the event took place, and if known why it happened.

COMPLIANCE

GRF is committed to ensuring that all safety and health policies and procedures involving workplace violence prevention are clearly communicated and understood by all employees. All employees are responsible for using safe work practices, for following all directives, policies and procedures, and for assisting in maintaining a safe, healthy and secure work environment. Our system of ensuring that all employees, including supervisors and managers, comply with 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:

- 1. Training employees, supervisors, and managers of the provisions of GRF's Workplace Violence Prevention Program (WVPP) when they are hired and periodically through memos, electronic mail, staff meetings, and training.
- 2. Evaluating the performance of employees to ensure compliance with The Organization's WVPP.
- Recognizing employees who demonstrate work practices that promote the WVPP in the workplace by (example: verbal/written recognition by management, incentive program, etc.).
- 4. Providing training and/or Employee Assistance Program services to employees whose compliance is deficient with the WVPP.
- 5. Disciplining employees for failure to comply with WVPP.
- 6. Providing employees with access to this written WVPP.
- 7. Ensure that the WVPP program is posted on GRF's employee website and made available to all employees. Provide electronic or physical copies of the WVPP to any 3rd party provider of regular onsite services upon request.

The Foundation ensures the following:

- Employees will not be threatened with adverse action or retaliated against
 in any way if they refuse to report to or leave a workplace or worksite
 because they have a reasonable belief that the workplace or worksite is
 unsafe.
- 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.

Coordination of Safety Efforts with Other Employers & Employees

In efforts to coordinate similar safety measures with employers who provide regular onsite employees in support of services to Rossmoor, the Foundation will provide a copy of our WVPP along with instructions from department managers on how third-party employees should respond in safety situation concerning potential acts of violence while on the premises. These efforts will be taken to ensure complimentary and supportive efforts are taken by these business partner employers to ensure safety awareness for their employees and how to take appropriate safety actions when working on our premises.

COMMUNICATION

GRF recognizes that to maintain a safe, healthy and secure workplace we must communicate to all employees, all workplace safety, health and security issues. We have a communication system designed to encourage a continuous flow of safety, health and security information between management and our employees without fear of reprisal and in a form that is readily understandable. We will communicate the WVPP policies and procedures through:

- 1. New employee orientation.
- 2. Yearly review of our WVPP with all employees.
- Training programs designed to address specific aspects of workplace violence prevention and security unique to our location.
- 4. Posting and distributing workplace violence prevention information.
- Reporting workplace violence/security hazards or threats of violence. (Talk to your supervisors first, if that isn't possible, contact your department Director, Human Resources staff or Public Safety Manager.
- 6. Effective communication between employees, managers, and supervisors about security and violence concerns, including translation where appropriate.
- 7. Protecting employees who report incidents of workplace violence from retaliation by the person making the threats. Employees who report incidents of workplace violence will be protected from the person making the threats by GRF who will take immediate and appropriate action - 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.
- 8. A system for workers to anonymously inform management about workplace security and violence concerns.
- Addressing workplace violence prevention/security concerns at monthly Safety
 Committee meetings. The Safety Committee will recommend solutions to
 management and the program administrators along with Senior Management
 will implement approved solutions.

Incident Reporting Procedures

The importance of reporting concerns relating to workplace violence is of critical importance. Any knowledge of such issues should be reported immediately as follows:

- Call Human Resources, the Public Safety Manager or the Walnut Creek Police Department if there is a potential concern.
- 2. Call 911 if there is an emergency situation or if someone has been seriously injured.
- Report all threats or acts of workplace violence to your supervisor or manager.
 If that's not possible, report incidents to your department Director, Human Resources, Public Safety Manager or the Walnut Creek Police Department.
- 4. The supervisor or manager should complete an Incident Report Form and give it to Human Resources. You can obtain these forms from Human Resources.

HAZARD ASSESSMENT

Department Managers will perform workplace hazard assessment for workplace security in the form of periodic inspections. Periodic inspections to identify and evaluate workplace security hazards and threats of workplace violence are performed by the following observer(s) in the following areas of our workplace:

Periodic inspections are performed according to the following schedule:

- 1. When the WVPP Program is initially established or whenever updated;
- 2. When new, previously unidentified security hazards are recognized;
- 3. When occupational injuries or threats of injury occur; and
- 4. Whenever workplace security conditions warrant an inspection.

The following policies and procedures are established to ensure Department Managers participate in designing and conducting periodic inspections to identify and evaluate workplace violence hazards:

- Department Managers are required to review and assess potential security hazards with a member(s) of the Safety Committee and/or Director of Human Resources or Public Safety Manager whenever a potential security hazard is observed or reported;
- Based on the Department Managers knowledge of the work and work area including assigned personnel, they will be required to assist in determining workplace safety solutions or remedies to prevent workplace violence hazards.

Periodic inspections for security hazards consist of identification and evaluation of workplace security hazards and changes in worker work practices, and may require assessing for more than one type of workplace violence. GRF performs inspections for each type of workplace violence by using the methods specified below to identify and evaluate workplace security hazards. The Department Managers will perform workplace hazard assessment for workplace violence prevention/security in the form of periodic inspections. Periodic 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. Our establishment performs inspections for each type of workplace violence by using the methods specified in documentation formats below to identify and evaluate workplace hazards:

WORPLACE VIOLENCE HAZARD ASSESSMENT

Observer Name	Date	Site

Type I Workplace Security Hazards (Criminal Acts)

Hazard	Notes for Improvement
The exterior and interior of the workplace for its attractiveness to robbery or other criminal acts.	
The need for security surveillance measures, such as mirrors or cameras.	
Posting of signs notifying the public that limited cash is kept on the premises.	
Procedures for employee response during a robbery or other criminal act.	
Procedures for reporting suspicious persons or activities.	
Posting of emergency telephone numbers for law enforcement, fire and medical services where employees have access to a telephone with an outside line.	
Limiting the amount of cash on hand and using safes for large amounts of cash, or armor car pickup.	
Building alarm systems and Crime Prevention through Environmental Design.	
Other: Including landscaping, lighting, ingress/egress, building design.	

Notes:			

Type II Workplace Security Hazards (Customers/Residents, Clients, & Visitors)

Hazard	Notes for Improvement
Access to, and freedom of movement within, the workplace.	
Adequacy of workplace security systems, such as door locks, 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.	
Employee's skill in safely handling threatening or hostile service recipients.	
Effectiveness of systems and procedures to warn others of a security danger or to summon assistance, e.g., alarms or panic buttons.	
The use of work practices such as "buddy" systems for specified emergency events.	
The availability of employee's posted escape routes.	
Notes:	

Type III Workplace Security Hazards (Present or Former Employee, Supervisor or Manager)

Hazard	Notes for Improvement
How well our establishment's workplace violence prevention policy has been communicated to employees, supervisors, or managers.	
How well our establishment's management and employees communicate with each other.	
Our employees', supervisors' and managers' knowledge of the warning signs of potential workplace violence.	
Access to, and freedom of movement within, the workplace by non-employees, including former employees or persons with whom one of our employees is having a dispute.	
Frequency and severity of worker reports of incidents 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.	
Worker progressive disciplinary procedures.	
Notes:	

Type IV Workplace Security Hazards (Personal Relationship)

Hazard	Notes for Improvement
How well our establishment's workplace violence prevention policy has been communicated to employees, supervisors, or managers.	
How well our establishment's management and employees communicate with each other.	
Our employees', supervisors' and managers' knowledge of the warning signs of potential workplace violence.	
Access to, and freedom of movement within, the workplace by non-employees, including former employees or persons with whom one of our employees is having a dispute.	
Frequency and severity of worker reports of incidents 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.	
Notes:	

WORKPLACE VIOLENCE INCIDENT INVESTIGATIONS

We have established the following policy for investigating incidents of workplace violence. Our procedures for investigating incidents of workplace violence, which includes threats and acts of violence, include:

- Visiting the scene of an incident as soon as possible by the Program Administrator(s).
- Interview with involved employees and witnesses by the Program Administrator(s) or Human Resources.
- Examining the workplace for security risk factors associated with the incident, including any previous reports of inappropriate behavior by the perpetrator.
- Determining the cause of the incident.
- Reviewing all previous incidents.
- Recording the findings and ensuring corrective actions are taken and prevent similar incidents from occurring.
- If possible, obtain any reports completed by law enforcement for further review and investigation.
- Providing relevant information to Senior Managers who are able to support remedial efforts.

WORKPLACE VIOLENCE HAZARD CORRECTION

Hazards, which threaten the security of employees, shall be corrected based on severity when they are first observed or discovered.

- If an imminent hazard exists that cannot be immediately abated without endangering worker(s) and/or property, all exposed workers will be removed from the situation except those necessary to correct the existing condition. Workers necessary to correct the hazardous condition will be provided with the necessary protection.
- All corrective actions taken and the dates they are completed will be documented on the WVPP Correction and Action List.

TRAINING AND INSTRUCTION

GRF has established the following policy with respect to training all employees on workplace security. All employees, including managers and supervisors, shall have training and instruction on general and job-specific workplace security practices.

Training and instruction shall be provided when the Workplace Violence Prevention Program (WVPP) is first established and periodically thereafter. Training shall also be provided to all new employees, to other employees for whom training has not previously been provided and to all employees, supervisors, and managers given new job assignments for which specific workplace security training for that job assignment has not previously been provided.

Additional training and instruction will be provided to all personnel whenever the organization is made aware of new or previously unrecognized security hazards. Examples of general workplace security training and instruction include:

Introduction-to and the importance of the WPPP and crime prevention.
Explanation of the WPVPP including measures for reporting any violent acts
or threats of violence.
Key Definitions associated with this program.

	How to report violent incidents or concerns to the organization and/or law
	enforcement without fear of reprisal.
	Recognition of workplace security hazards unique to employee's jobs.
	The risk factors associated with the four types of workplace violence.
	Measures to prevent workplace violence, including procedures for reporting workplace security hazards or threats to managers and supervisors.
	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
	Measures to summon others for assistance.
	Routes of escape.
Emerg	ency medical care to be provided to a victim of any violent act upon a worker.

RECORD KEEPING

An effective record keeping system helps in selecting the appropriate level of controls to prevent recurrence and in determining required training. Records should be kept up to date and will be maintained in accordance with the following retention schedule:

- 1. Records of workplace violence hazard identification, evaluation, and correction shall be created and maintained for a minimum of five years.
- 2. Training records shall be created and maintained for a minimum of three years and include training dates, contents or a summary of the training sessions, name(s) and position of persons conducting the training, and names and department of all persons attending the training sessions.
- Violent incident logs required by subdivision (d) shall be maintained for a minimum of five years.
- 4. Records of workplace violence incident investigations conducted pursuant to subparagraph (K) of paragraph (2) of subdivision (c) shall 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.

- 5. All records required by this subdivision shall be made available to the division upon request for examination and copying.
- 6. All records required by paragraphs (1) to (3), inclusive, 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

Appendix

- Appendix A Workplace Violence Prevention Incident Report Form
- Appendix B Post Incident Assessment
- Appendix C Workplace Violence Incident
- Appendix D WVPP Correction and Action List
- Appendix E Employee Resources
- Appendix E Workplace Violence Prevention Program Progressive
 Behavior Action Guidelines for Supervising Managers

Workplace Violence Prevention Incident Report Form

Part I through Part VI should be completed by the designated person based on information provided by the employee(s) involved in the incident. If any of this information includes private/sensitive data, please maintain confidentiality of affected parties/employees and handle information according to Human Resource protocols.

PART I - NATURE OF INCIDENT - (check all that apply)					
□Threat	□Physical with Injury		□Information Only		
□Verbal	□Physical without Injury		□Electronic		
□Written	□Harassment		☐Behavioral Observation		
□Other					
Date of Incident		Арр	roximate Time:		a.m. / p.m.
	PART II -	INCIDE	NT DIRECTED AT:		
Person(s):					
Place:					
Building:					
	PART III -	INCIDE	ENT INITIATED AT:		
Person(s)					
□Male □ Fe	emale □Other Classific	ation:			
Worksite:					
	PART IV - TYPE/L	OCATIO	ON INCIDENT OCC	URRED	
Section A - Type	of Contact				
□In person □ Tel	lephone □ Mail □ Observation	n 🗆 Re	ecording □Electro	onic Mail	
□Other	□Other				
Was the employee alone?	□ Yes □ No				
Section B - Location of Incident					
□Workplace □Employee Residence □ Other					
Section C - Address/Location where incident occurred					

Street	City	State	Zip Code
Section D - Incident Details			
Were any threats made before the incident occurred?	□Yes □No		
If yes, describe threat(s):			
Were any threats made before the incident occurred?	□Yes □No		
If yes, describe threat(s):			
Did the employee(s) ever report to the department	□Vaa □Na		
that he/she was threatened, harassed, or suspicious that the attacker may become violent?	□Yes □No		
Was the perpetrator a stranger, client/patient, co-worke	r, or otherwise familia	r person?	
Was a weapon used?	□Yes □No		
If yes, what type of weapon?	1		

Section E - Injuries							
Were there any injuries? ☐Yes ☐No							
If yes, wh	If yes, who was injured? (answer below)						
Name:				Phone:			
Injury Des	cription:						
Name:				Phone:			
Injury Des	cription:						
Name:				Phone:			
Injury Des	cription:						
Witnesse	s(s) to the incident:						
Name:				Phone:			
A d d v a a a .	S	treet	City	State	Zip Code		
Address:							
Name:				Phone:			
A d d v a a a .	S	treet	City	State	Zip Code		
Address:							
Name:				Phone:			
۸ ما ماد	S	treet	City	State	Zip Code		
Address:	Address:						

PART V - ACTION TAKEN-REPORTING SUPERVISOR				
Reporting Supervisor			Date/Time	
Actions Taken:				
Law enforcement or other outs	side agencies contacted?	□Yes □No		
Agency Name:				
Case Number, if applicable				
Were Employee Assistance Pr	rogram services provided?	□Yes □No		
If yes, please describe:				
	PART VI - ADMI	NISTRATIVE ACTIO	N:	
Actions Taken:				

Post Incident Assessment

Observer	Date
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#	Assessment		Yes	No
1.	Were there any physical injuries or psychological incidents? If yes, please describe. (below)			
Employee	e/person's name:			
Type of ir	njury			
Type of c	are provided			
2.	Was the employee(s) alone?			
3.	Was there a security guard on duty?			
4.	If yes, did the sec	urity guard respond		
5.	What time did the	incident occur?		
6.	6. Was the perpetrator a stranger, client/patient, co-worker or otherwise familiar person? (explain below)			
Notes:				
7.	Were any threats	made before the incident occurred?		
8.	Did the worker(s) ever report to the employer that they were threatened, harassed, or suspicious that the attacker may become violent?			
If yes, what was the employer's response?				
9.	What type of wea	pon did the attacker use against the worker? (explain below)		
Notes:				
10.	How did the perpe	etrator obtain the weapon? (explain below)		
Notes:				
11.		ever report to the employer that they were threatened, harassed, or suspicious nay become violent?		

12.	What were the main factors that contributed to the incident? (explain below)			
Notes:				
			I	
13.	Was "Critical Incident Stress Debriefing and Post-Trauma Counseling services provi	ded?		
If yes, desc	ribe:			
14.	What can be done to prevent future incidents? (explain below)			
Notes:				
15.	What can be done to prevent future incidents? (explain below)			
Prevention Measure Date Completed		d		

Workplace Violence Incident Log

WPV Violent Incident Log – Template (click file to open)



WVPP Correction and Action List

Corrections Identified	Follow-up Actions		Completion Date	
Additional Comments:				
Reviewed By:		Date:		

Employee Resources

There are several places employees can turn to for help when they have, in some way, been involved with workplace violence. The following suggestions are provided as a starting point:

- Contact Human Resources for information on help and assistance that may be provided to you through our group benefit providers.
- The Public Safety Manager may have additional information on supporting measures or services to help.
- Employee Assistance Program (EAP): Employees can obtain support through our EAP, Uprise/Claremont, at (800) 834-3773.
- Support Group: Sometimes talking with others who have shared the same experience is helpful in the healing process. If this is the case, consider joining a local support group.

Workplace Violence Prevention Program Progressive Behavior Action Guidelines for Supervising Managers

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

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

The following video will help you to know what to do in the case of a workplace violence situation involving an active shooter:

RUN. HIDE. FIGHT.® Surviving an Active Shooter Event

https://www.youtube.com/watch?v=5VcSwejU2D0

Active Shooter Response Guide

The "Run, Hide, Fight" approach has gained national recognition as one of the most prominent active shooter defense strategies.



RUN

- · Be aware of your surroundings.
- · If you can escape to a safer area, get out.
- · Create as much distance between you and the threat as possible.



HIDE

- · If you can't evacuate, find a safe place to hide.
- · Turn off the lights, silence your phone, and be silent.
- . Find barriers to prevent or slow the shooter from reaching you.



FIGHT

- · If you have no other option, confront the shooter.
- · Be aggressive, yell, throw items, and use improvised weapons.
- · Commit to your actions and survive by any means necessary.

Call 911 When Safe

Dial 911, if possible, to alert police to the active shooter's location. If you cannot speak, leave the line open and allow the dispatcher to listen.