

# **California Workplace Violence Prevention Plan**

Our establishment's Workplace Violence Prevention Plan (WVPP) addresses the hazards known to be associated with the four types of workplace violence as defined by <u>Labor Code (LC) section 6401.9</u>.

Date of Last Review: June 28, 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 is required by LC section 6401.9.

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

**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. It does not include accidents or incidents resulting from handling or caring for animals in Destination Pet's control. Any potential incidents regarding animal bites, attacks, or other violence should instead be immediately reported to your manager and to <a href="mailto:safety@destpet.com">safety@destpet.com</a>.

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

### RESPONSIBILITY

The WVPP administrator is the VP of Human Resources, and they have the authority and responsibility for implementing the provisions of this plan for Destination Pet.

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

#### EMPLOYEE ACTIVE INVOLVEMENT

Destination Pet created 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 and authorized employee representatives to participate in:
  - Identifying, evaluating, and determining corrective measures to prevent workplace violence.
     Employees should feel empowered to raise potential safety or potential workplace violence concerns with management or human resources. Likewise, management will work with employees to investigate the root causes of any potential, threatened, or actual workplace violence incidents.
  - Designing and implementing training. Employees are encouraged to provide constructive feedback on training programs, and management will review and incorporate their suggestions where appropriate and helpful.
  - Reporting and investigating workplace violence incidents. Employees should report any potential, threatened, or actual workplace violence and should cooperate with investigations into them. Retaliation against an employee for reporting or cooperating with an investigation into workplace violence is strictly prohibited.

- 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. Destination Pet's Employee Handbook contains any applicable policies.
- 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 ensures 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 that create a security hazard for others in the workplace, including at a minimum:

- Training employees, supervisors, and managers in Destination Pet's Workplace Violence Prevention Plan (WVPP) provisions.
- Effective procedures to ensure that supervisory and nonsupervisory employees comply with the WVPP include but are not limited to training, root cause analysis, and confirmations by the District Directors.
- 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 by periodically highlighting successes by employees in the Pack Action Memo and manager calls.
- Discipline employees for failing to comply with the WVPP, as such failures would also violate the Employee Conduct and Ethics section of the Destination Pet Employee Handbook.

## **COMMUNICATION WITH EMPLOYEES**

We recognize that open, two-way communication between our management team, staff, and other employers 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:

- Workplace violence prevention training programs.
- Periodic meetings that address security issues and potential workplace violence hazards.
- Effective communication between employees and supervisors about workplace violence prevention and violence concerns—if employees are uncomfortable escalating concerns to their supervisors, they are always free to raise concerns through Lighthouse or through Human Resources.
- Posted or distributed workplace violence prevention information.
- How employees can report a violent incident, threat, or other workplace violence concern to employer or law enforcement without fear of reprisal or adverse action:
  - Employees can anonymously report a violent incident, threat, or other violence concerns through Lighthouse

- In an immediate life-threatening emergency, employees should always call 9-1-1 first, either from the phones in the center or their personal mobile phone.
- 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. They will be informed of the results of
  the investigation and any corrective actions to be taken.

## WORKPLACE VIOLENCE INCIDENT REPORTING PROCEDURE

Destination will implement the following effective procedures to ensure that:

- In a life-threatening workplace-violence emergency, employees should always call 9-1-1 first.
  - All threats or acts of workplace violence should reported to an employee's supervisor or manager, who will inform the WVPP administrator. If that's not possible, employees should report incidents directly to Human Resources.
- Employees may also make anonymous reports to Lighthouse Services.
  - a. Website: www.lighthouse-services.com/destpet
  - b. Anonymous Reporting App: Scan the QR Code on the Flyer at your center and use the Keyword: DESTPET
  - c. Telephone: English and Spanish speaking call 833-203-6462 (must include company name Destination Pet)
  - d. E-mail: <a href="mailto:reports@lighthouse-services.com">reports@lighthouse-services.com</a> (must include company name with report Destination Pet)
  - e. Fax: 215-689-3885 (must include company name with report Destination Pet)

A strict non-retaliation policy is in place, and retaliation is not tolerated. Any form of retaliation by an employee against a coworker for reporting an incident could be subject to discipline up to and including termination of employment.

## EMERGENCY RESPONSE PROCEDURES

Destination Pet has in place the following specific measures to handle actual or potential workplace violence emergencies:

- This means alerting employees of the presence, location, and nature of workplace violence emergencies by several options, including but not limited to email, phone calls, and text messages.
- Employees will be knowledgeable on the best means to exit the facilities or be instructed to shelter in place, if appropriate.
- Employees should always contact 9-1-1 or local law enforcement if a life-threatening workplace-violence emergency occurs. After having done so, employees should notify their managers and Human Resources.

In the event of an emergency, including a Workplace Violence Emergency, after employees contact their manager, they should contact the following:

Responsible	Job	WVPP	Email
Persons	Title/Position	Responsibility(ies)	
Melanie Braden	VP of HR	Melanie is the WVPP Administrator. She is also responsible for employee relations and investigations.	Melanie.braden@destpet.com
Ilene Presworsky	Director of Safety	Ilene is responsible for Destination Pet's commitment to safety in its centers, and provides safety training, investigations, and assistance with remediation.	Ilene.presworsky@destpet.com

#### WORKPLACE VIOLENCE HAZARD IDENTIFICATION AND EVALUATION

The following policies and procedures are established and required to be conducted by Destination Pet to ensure that workplace violence hazards are identified and evaluated:

- Inspections shall be conducted during routine center visits by District Directors, after each workplace violence incident, and whenever the employer is made aware of a new or previously unrecognized hazard.
- The Company will review all submitted/reported concerns of potential hazards from employees.

## **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 during the District Director's visits to the locations.

Inspections for workplace violence hazards include assessing many situations, but some would include:

- Whether cameras in the center are functional.
- Effective location and functioning of emergency buttons and alarms, if present in the center.
- Posting of emergency telephone numbers for law enforcement, fire, and medical services.
- Functionality of workplace security systems, such as door locks, entry codes or badge readers, security windows, physical barriers, and restraint systems.

## WORKPLACE VIOLENCE HAZARD CORRECTION

Workplace violence hazards will be evaluated and corrected in a timely manner. Destination Pet will implement the following effective procedures to correct workplace violence hazards that are identified:

 Suppose an imminent workplace violence hazard exists that cannot be immediately abated without endangering employee(s). In that case, all exposed employee(s) will be removed from the situation except those necessary to correct the existing condition. Employees who correct the hazardous

- conditions will be provided with the necessary protection.
- 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.
- 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.
- o 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 company will ensure that no personal identifying information is recorded or documented in the written investigation report.

## TRAINING AND INSTRUCTION

All employees, including managers and supervisors, will have training and instruction on general and job-specific workplace violence practices. These will occur:

- After 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 or when changes are made to the plan, additional training may be limited to addressing the new workplace violence hazard or modifications to the plan.

Destination Pet will provide its employees with training and instruction on the definitions found on page 1 of this plan and the requirements listed below:

- Our WVPP, how to obtain a copy of our plan at no cost, and how to participate in developing and implementing the employer's plan.
- How can workplace violence incidents or concerns be reported to the employer or law enforcement without fear of reprisal?
- Workplace violence hazards specific to the employees' jobs, the corrective measures Destination Pet has implemented, how to seek assistance to prevent or respond to violence, and strategies to avoid physical harm.

## EMPLOYEE ACCESS TO THE WRITTEN WVPP

Destination Pet 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 maintaining the WVPP electronically and providing employees with electronic access.

## RECORDKEEPING

**Destination Pet 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:
  - o 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 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 Destination Pet 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 Destination Pet's WVPP should include, but is not limited to:
  - o 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 correctly identified, evaluated, and corrected.

### EMPLOYER REPORTING RESPONSIBILITIES

As required by <u>California Code of Regulations (CCR)</u>, <u>Title 8</u>, <u>Section 342(a)</u>. <u>Reporting Work-Connected Fatalities and Serious Injuries</u>, Destination Pet will immediately report to Cal/OSHA any serious injury or illness (as defined by <u>CCR</u>, <u>Title 8</u>, <u>Section 330(h)</u>) or death (including any due to Workplace Violence) of an employee occurring in a place of employment or connection with any employment.

# **Authorization and Commitment to Workplace Violence Prevention Plan**

I, Robin Erwin, Chief Human Resources Officer of Destination Pet, hereby authorize and ensure the establishment, implementation, and maintenance of this written workplace violence prevention plan and the documents/forms within this written plan. I am committed to promoting a culture of safety and violence prevention in our workplace and believe these policies and procedures will help us achieve that goal."

Robin Erwin	
Chief Human Resources Officer	
/s/ Robin Erwin	July 1, 2024

## **Violent Incident Log**

This log must be used for every workplace violence incident that occurs in our workplace.

The information that is recorded will be based on:

- Information provided by the employees who experienced the incident of violence.
- Witness statements.
- All other investigation findings.

All information that personally identifies the individual(s) involved will be omitted from this log, such as:

- Names
- Addresses physical and electronic
- Telephone numbers
- Social security number

### **Date the incident occurred:**

### Enter the time (or approximate time) that the incident occurred:

Location(s) of Incident	Workplace Violence Type (Indicate which type(s) (Type 1, 2,3,4)

#### Check which of the following describes the type(s) of the incident and explain in detail:

**Note:** It's important to understand that "Workplace Violence Type" and "Type of Incident" have separate requirements. For this part of the log, "Type of Incident" specifically refers to the nature or characteristics of the incident being logged. It does not refer to the type of workplace violence.

- 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.
- Other.

<u>Provide a detailed description of the incident and any additional information on the vio</u>	<u>lence incident type</u>
and what it included. Continue on a separate sheet of paper if necessary.	

<del></del>					
Workplace violence committed by (here, only include whether the perpetrator was a customer/employee/family/friend/etc. and do not include names):  Circumstances at the time of the incident:					
Where the incident occurred within or near the center:					
Consequences of the incident, including, but not limited to:					
Whether security or law enforcement was contacted and their response.					
<ul> <li>Actions taken to protect employees from a continuing threat or any other hazards identified as a result of the incident.</li> </ul>					
Were there any injuries? Yes or No. Please explain:					
<ul> <li>Were emergency medical responders other than law enforcement contacted, such as a Fire Department, Paramedics, or On-site First-aid certified personnel? Yes or No. If yes, explain below:</li> </ul>					
<b>Did the severity of the injuries require reporting to Cal/OSHA?</b> If yes, document the date and time this was done, along with the name of the Cal/OSHA representative contacted.					
This violent incident log was completed by and on the following date:					