

## **Chick-fil-A Unit No 01507 Workplace Violence Prevention Plan**

Chick-fil-A Unit No. 01507 is committed to the safety and well-being of its employees. We do not tolerate any form of violence or threats of violence in the workplace and will make every effort to prevent violent incidents from occurring by implementing a Workplace Violence Prevention Plan ("WVPP"). The following procedures have been prepared pursuant to California Senate Bill 553.

It is our policy that all employees are required to receive annual training on the prevention of workplace violence. All Directors, Managers, Supervisors and anyone in a role of authority ("Management") are responsible for administering the WVPP. The following sections are within this WVPP:

- Introduction;
- Purpose;
- Administration and Implementation;
- Definitions;
- Compliance;
- Communication;
- Reports of Workplace Violence;
- Response to Workplace Violence;
- Hazard Identification, Evaluation and Correction;
- Investigation and Post-Incident Response;
- Violence Incident Log;
- WVPP Review;
- Training; and
- Recordkeeping.

### **Introduction**

The WVPP is an important part of our Safety Program and the effectiveness of the WVPP depends upon the support, cooperation and participation of every employee. Employees are required to perform their work and conduct themselves in a safe manner, observe all safety rules, policies and procedures, and work cooperatively for the continued success of the Safety Program. The primary objective of the WVPP is to prevent and/or eliminate workplace violence as follows:

- Establish and maintain an effective WVPP;
- Provide a safe working environment;
- Establish policies, training and communications to improve workplace violence prevention; and
- Provide written records of workplace violence incidents and investigations, in accordance with this WVPP.

Employees, who have questions about this WVPP, or their responsibilities with respect to workplace safety, should direct them to management and/or the Operator.

### **Purpose**

We prohibit and will not tolerate any form of workplace violence or threats of violence by any employee or third party, including customers, clients, vendors, visitors or others, either at the workplace, in or on Chick-fil-A property or at Chick-fil-A sponsored events. We also prohibit firearms of any kind in or on Chick-fil-A property.

Any employee threatening violence of any kind or physically harming another person in an act of violence will be subject to disciplinary action, up to and including termination.

This WVPP describes the training and safety procedures that all employees shall follow while employed here.

This WVPP ensures that all employees adhere to work practices that are designed to make the workplace more secure and safe, and do not engage in verbal threats or physical actions which create a security hazard for others in this workplace.

### **Administration and Implementation**

The individual with principal authority and responsibility for administering and maintaining this WVPP is the Operator. In the absence of the Operator, the person with authority and responsibility for implementation of this WVPP is the Executive Director.

Management will know and understand this WVPP, policies and procedures, and are responsible for implementing them. We encourage employees to inform management and/or the Operator of any suggestions and/or concerns in the protocols, procedures and implementation of this WVPP.

Management and the Operator will assess the vulnerability to workplace violence and establish preventive actions to be taken. Management will be responsible for developing employee training programs in violence prevention and plans for responding to acts of violence and threats of violence. The Operator will also periodically audit this WVPP.

A copy of this WVPP is available to all employees free of charge and can be obtained from management or the Operator.

### **Definitions**

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

2. **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.
3. **Log:** The Violence Incident Log required by this WVPP.
4. **Plan:** This Workplace Violence Prevention Plan.
5. **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.
6. **Workplace violence:** Any act of violence or threat of violence that occurs in a place of employment, including, but not limited to, the following: (a) 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; (b) 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; and (c) the following four workplace violence types:
  - A. **Type 1 violence:** workplace violence committed by a person who has no legitimate business at the worksite, including violent acts by anyone who enters the workplace or approaches employees with the intent to commit a crime.
  - B. **Type 2 violence:** workplace violence directed at employees by customers, clients, vendors, visitors or others.
  - C. **Type 3 violence:** workplace violence against an employee by a present or former employee.
  - D. **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.

7. **Work practice controls:** Procedures and rules which are used to effectively reduce workplace violence hazards.
8. **Environmental risk factors:** Factors in the facility or area in which services or operations are conducted that may contribute to the likelihood or severity of a workplace violence incident, including, but not limited to, risk factors associated with the specific task being performed, such as the collection of money.

## **Compliance**

All employees are responsible and will be held accountable for using safe work practices, for following all directives, policies and procedures, and for assisting in maintaining a safe and secure work environment. Failure to adhere to this WVPP or policies may result in disciplinary action, up to and including termination.

Management and employees will comply with work practices that are designed to make the workplace more secure, and will not engage in threats or physical actions which create a security hazard for others in the workplace. Management will adhere to the following:

- Inform and make available to all employees this WVPP;
- Evaluate employees in complying with this WVPP;
- Provide training to employees who need to improve work practices designed to ensure workplace security;
- Periodic review and inspection of this WVPP and workplace hazards;
- Discipline employees for failure to comply with this WVPP; and
- Follow this established WVPP.

### **Communication**

Management will maintain an open, two-way communication system on all workplace safety and security issues. We have a communication system designed to encourage a continuous flow of safety and security information between management and employees without fear of reprisal.

Our communication system consists of the following:

- New employee orientation;
- Annual review and training of this WVPP with employees;
- Verbal, memorandums, posted or distributed notices;
- Violence Incident Report Form available to report workplace violence or threats of workplace violence;
- Workplace Violence Prevention Plan Suggestion Form available for employees to inform management about workplace security hazards, concerns and/or suggestions (anonymously if preferred); and
- Procedures for protecting employees who report threats from retaliation by the person making the threats.

We require prompt and accurate reporting of all violent incidents whether or not physical injury has occurred. We will not discriminate against victims of workplace violence.

Management may obtain the active involvement of employees at least annually by one or more of the following:

- Provide this WVPP to employees and ask for feedback;
- Survey employees regarding this WVPP;
- During safety training;
- Provide Workplace Violence Prevention Plan Suggestion Forms for employees to provide suggestions, feedback and/or concerns regarding this WVPP. This may be done anonymously if preferred.

### **Reports of Workplace Violence**

We require all employees to report workplace violence, including threats of violence.

No employee will be subject to discipline, retaliation or reprisal for reporting workplace violence, threats of workplace violence, concern for workplace violence or an injury resulting from workplace violence. Depending on the nature of the incident, we may provide an employee with counseling or training, as warranted.

Incidents of workplace violence or threats of workplace violence must be reported immediately by way of one or more of the following:

- Verbal to management;
- Verbal to the Operator;
- Filling out a Violence Incident Report Form via cfateam.org and submitting it to management or the Operator;
- To law enforcement, as appropriate.

Any management personnel receiving information verbally from an employee regarding a workplace violence incident must fill out a Violence Incident Report Form via cfateam.org and immediately report it to the Operator.

The Operator and Management will accept and respond to reports of workplace violence or threats of workplace violence. The Operator or Management is responsible for recording information relating to each occurrence of an incident on the Violence Incident Log. If workplace violence results in an injury, the necessary forms, such as but not limited to, Injury Report form (IIPP-5a), Injury Investigation Report form (IIPP-5b), Worker's Compensation Form DWC-1 along with the Violence Incident Log.

Employees may also report incidents of workplace violence to law enforcement, as appropriate.

#### **Emergency situations**

- During an emergency situation of workplace violence, employees observing the situation should do the following:
  - Get to safety; and
  - Call 911 immediately.

#### **Non-emergency situations**

- Employees should inform management or the Operator verbally or fill out a Violence Incident Report Form.

Any employee who reports workplace violence or threats of workplace violence and believes they are being subjected to discipline, retaliation or reprisal should report it to the Operator.

#### **Response to Workplace Violence**

Management will respond to actual or potential workplace violence and threats of workplace violence, including emergencies, by way of one or more of the following methods:

- Making this WVPP available to all employees;
- Annual training;
- Informing employees how to obtain help from management or the Operator;
- Conduct an internal investigation;
- Take appropriate disciplinary action as warranted;
- Employees and/or management may contact law enforcement by dialing 911 or directly calling local law enforcement at: 760-435-4900;
- Alerting employees of the presence, location and nature of workplace violence emergencies by verbal announcement; and
- Informing employees when to evacuate.

#### **Hazard Identification, Evaluation and Correction**

Management will periodically conduct inspections for workplace violence hazards. Periodic inspections consist of identification, evaluation and correction of workplace security hazards, unsafe

conditions, work practices and employee reports and concerns. Hazards identified during the inspection will be documented on the Security Hazard Identification, Evaluation and Correction Form.

Periodic workplace violence hazard inspections will be conducted as follows:

- When this WVPP is first established;
- When Management is made aware of a new or previously unrecognized workplace violence hazard;
- After each workplace violence incident; and
- Whenever there is a report of a workplace violence incident.

Workplace violence hazard inspections may include, but not limited to, the following:

- Review all workplace violence incidents that occurred within the previous year, regardless of whether an injury occurred;
- Identify and evaluate environmental risk factors for workplace violence in surrounding areas, such as employee parking areas and other outdoor areas; and
- An assessment of environmental risk factor may include, but not limited to, the following:
  - Employees working in locations isolated from other employees because their task requires them to work alone, in remote locations, during night or early morning hours or where an assailant could prevent entry into the work area by responders or other employees;
  - Poor illumination or blocked visibility of areas where assailants may be present;
  - Lack of effective escape routes;
  - Entryways where unauthorized entrance may occur, such as doors designated for staff entrance; and
  - Storage of currency.
- Management will correct workplace hazards which threaten the security of employees in a timely manner based on the severity of the hazard. Management will correct violence hazards either when observed or discovered or when an imminent hazard exists which cannot be immediately corrected without endangering employees and/or property. Management will remove all employees from the area except those needed to correct the hazard. Employees needed to correct a hazardous condition will be provided the necessary safeguards.

Management will inform employees regarding completed workplace violence investigations conducted pursuant to this WVPP and the records of any action taken, in accordance with the Communications section of this WVPP. Corrective measures may include, as applicable, but not limited to, the following:

- Ensuring Management is aware, knowledgeable and available to prevent and immediately respond to workplace violence incidents;
- Providing line of sight or other communication in all areas where members of the public may be present. This may include removal of barriers and/or obstacles blocking in-line sight, providing security cameras or other sight aids such as mirrors, use of a buddy system, improving illumination or other effective means; and
- Configure spaces so that employee access to doors cannot be impeded by persons or obstacles.

### **Investigations and Post-Incident Response**

Management will investigate workplace violence, threats of workplace violence, concerns of workplace violence, and injuries from workplace violence, regardless of how they are reported or how management becomes aware of them.

The primary goal of an investigation is the prevention of similar incidents. Management is responsible to take all violent incidents seriously and will report to the Operator of any workplace violence incidents. Procedures for investigating workplace violence incidents may include, but not limited to, the following:

- Complete a Violence Incident Report Form;
- Review any relevant previous incidents;
- Interview the affected employee(s) and any witnesses;
- Visit the scene of the alleged incident;
- Examine the workplace for factors associated with the incident;
- Review any relevant physical, electronic or other devices, such as video footage, photographs, emails and/or other communications; and
- Take corrective action necessary to mitigate the violence incident and prevent the incident from reoccurring.

Management will inform employees of investigations and corrective actions by way of the following:

- Providing the employee a copy of any completed workplace violence investigation relevant to the employee's concern and the records of any corrective action taken. However, no personal identifying information of any other employee which is the subject of the investigation will be provided to employee(s) not involved in the incident;



- The Operator will meet with the employee to discuss the concerns, the investigation and the corrective actions taken;
- Sending the employee, via email or hard copy, a summary of the employee's concern, the investigation and actions taken in response to the employee's concern; and
- Posting any completed workplace violence investigation conducted and any corrective action taken. No personal identifying information will be posted or otherwise made publicly available.

### **Violence Incident Log**

The Operator or Management will record information regarding incidents of workplace violence in the Violence Incident Log. The Violence Incident Log shall contain the information requested about all incidents, the post-incident response and incident investigation.

The Operator or Management will prepare the Violence Incident Log based on information from witnesses, involved employees, including those who experienced the violent incident and on the findings of the investigation. The Violence Incident Log shall not contain any elements of personally identifiable information, such as a person's name, physical address, email address, phone number, Social Security number or any other information that, alone or in combination with other publicly available information, reveals any person's identity.

### **WVPP Review**

The Operator will review and may revise this WVPP if needed, annually, when a deficiency is observed and after a workplace violence incident. Reviewing the WVPP may consist of one or more, but not limited to, the following:

- Solicit feedback from individual employees about the WVPP;
- Attend safety training to obtain employee input;
- Conduct a survey regarding the WVPP and workplace violence; and/or
- Have Workplace Violence Prevention Plan Suggestion Forms available for employees to inform management about workplace security hazards, concerns and/or suggestions (anonymously if preferred).

### **Training**

We are committed to ensuring that all employees have effective training on workplace security practices that address workplace violence risks that employees may reasonably anticipate encountering in their jobs.

We will use training material appropriate in content and vocabulary to the educational level, literacy and language of employees. Training conducted in accordance with this plan will permit an opportunity for interactive questions and answers with employees. We also encourage feedback and suggestions at this time or anytime throughout the year on the WVPP training. Employees may also be randomly surveyed about their thoughts on the WVPP training. Training will be documented on a sign-in sheet with the following information:

- Summary of the training;
- Date of training;
- Names and qualifications of persons conducting the training; and
- Names and job titles of all employees being trained.

Training document sign-in sheets will be maintained for a minimum of one (1) year. Training will be conducted for the following:

- When this WVPP is first established;
- When changes are made to this WVPP;
- To all new employees at the start of hire;
- Annually;
- To employees given new job assignments for which specific workplace security training for that job assignment has not previously been provided;
- Whenever Management is made aware of a new or previously unrecognized workplace violence hazard; and
- For Management to familiarize themselves with the workplace violence hazards to which employees under their direction may be exposed.

Training will be provided on the following:

- This WVPP, including the definitions and requirements;
- How to obtain a copy of this WVPP at no cost;
- How to participate and give feedback and suggestions about this WVPP;
- Reporting workplace violence incidents or concerns without fear of reprisal as described in the Reports of Workplace Violence section of this WVPP;

- Workplace violence hazard specific to employee's job assignment, the corrective measures, how to seek assistance to prevent or respond to violence and strategies to avoid physical harm;
- The Violence Incident Log and how to obtain copies;
- Records of workplace violence hazard identification, evaluation and correction, and how to obtain copies; and
- Training records and how to obtain copies.

### **Record Keeping**

We will keep and maintain training records for at least one year. To the extent feasible, any associated written materials or presentations shall be kept with the training records.

We will keep and maintain Hazard, Evaluation and Correction records, Violence Incident Logs and workplace violence investigation records for at least five years.

A copy of the following records will be made available to employees upon request, free of charge, for review:

- Records of workplace violence hazard identification, evaluation and corrections;
- Training records; and
- Records of the Violence Incident Log.

Any employee personal identifiable information shall not be released, except as authorized by law. All records required will be made available to Cal/OSHA upon request.