



Cal/OSHA Publications Unit

June 2024

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WORKPLACE VIOLENCE PREVENTION PROGRAM for Actalent Inc. (Contractors)

Our Workplace Violence Prevention Plan (WVPP) addresses the hazards known to be associated with the four types of workplace violence as defined by Labor Code (LC) section 6401.9. The purpose of this plan is to provide general information around identifying, evaluating, and correcting workplace violence hazards, reporting, and responding to a violent workplace incident and emergency, preventing retaliation against employees who make reports, and how employees can be involved in developing and implementing a plan.

A worksite-specific plan and training will be provided by your host-employer.

Date of Last Review: June 2024

Date of Last Revision(s): June 2024

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 required by LC section 6401.9.

Plan - The workplace violence prevention plan 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.

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

RESPONSIBILITY

The WVPP administrators, Beck Williams (Health & Safety Controller) and Bill Swinburn (Head of Global Security), have the authority and responsibility for implementing the provisions of this plan for Actalent Inc. And Actalent Services.

Responsible Persons	Job Title/Position	WVPP Responsibility(ies)	Phone #	Email
Beck Williams	Health & Safety Controller	Overall responsibility for the plan; approves the final plan and any major changes.	757-578-6768	Rebwilli@allegisgroup.com
Bill Swinburn	Head of Global Security		410-579-6548	wswinburne@allegisgroup.com
Sheila Simmons	HR Business Partner	Responsible for employee training; communicates with broader employee groups about incidents and updates training materials.	480-665-3465	sheisimm@actalentservices.com
Actalent Health & Safety		Responsible for emergency response, handling any reports of workplace violence, and coordination with other employers; conducts safety inspections, coordinates emergency response procedures, and communicates with other employers about incidents.	1-888-902-SAFE (7233)	

EMPLOYEE ACTIVE INVOLVEMENT

Employees and authorized employee representatives who want to participate in developing and implementing the plan should reach out to Actalent Health & Safety by calling 1-888-902-SAFE (7233).

- Actalent will work with and allow employees and authorized employee representatives to participate in:
 - Identifying, evaluating, and determining corrective measures to prevent workplace violence
 - Designing and implementing training
 - Reporting workplace violence incidents
- These will be accomplished by:
 - Encouraging employees to share any workplace violence related concerns/hazards. Should workplace violence related concerns/hazards be reported, the WVPP Administrators, in partnership with Sheila Simmons, will meet with employees to evaluate those hazards and/or concerns and how to correct them. These meetings could involve brainstorming sessions, discussions of recent incidents, reviews of safety procedures, or meetings with the client.
 - At any time, employees can report concerns related to any workplace violence related concerns/hazards to Actalent's Health & Safety by calling 1-888-902-SAFE (7233).
 - Employee feedback will be solicited on design, content, and delivery of the training. Upon annual completion of the training, employee feedback is also solicited.

EMPLOYEE COMPLIANCE

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

- Training employees in the provisions of Actalent's Contractor Workplace Violence Prevention Program (WVPP)

- Effective procedures to ensure that employees comply with the WVPP.
- This will be accomplished by:
 - Auditing WVPP training logs
 - Investigating suspected incidents of non-compliance
 - Providing retraining to employees whose safety performance does not meet the expectations of the WVPP
 - Disciplining employees for failure to comply with the WVPP, up to and including termination

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:

- New employees will receive the Safety Handbook and California Workplace Violence Prevention addendum during onboarding. In addition, the California Workplace Violence Prevention addendum will be distributed annually.
- Employees can access an 800# in our California Contractor Handbook, Safety Handbook, and California Workplace Violence Prevention addendum by which they can report security issues and potential workplace violence hazards.
- Employees can report a violent incident, threat, or other workplace violence concern to the Company or law enforcement without fear of reprisal or adverse action. The following order should be followed when reporting an incident.
 1. **For incidents where the threat of violence is immediate and serious** - employees who observe or become aware of an incident or a threat of violence that is immediate and serious should immediately dial 9-1-1 from their cell phone, or any other available phone.
 - Contractors should then report any incident in accordance with instructions provided by the host client.
 - Lastly, contractors should reach out to Actalent Health & Safety (1-888-902-SAFE (7233)) or their Actalent account manager or recruiter for awareness, who will then engage Employee Relations.
 2. **For incidents where there is no immediate threat** (e.g., an interior door lock is broken, lighting needs to be replaced etc.) – employees should report incidents in accordance with instructions provided by the host client.

COORDINATION WITH OTHER EMPLOYERS

Actalent will implement the following effective procedures to coordinate the implementation of its plan with our clients to ensure that our clients and employees understand their respective roles, as provided in the plan.

- Actalent will train employees on the general provisions of workplace violence prevention. Our clients will provide training to our employees on the site-specific provisions of workplace violence prevention.
- Workplace violence incidents involving any contractor are reported to Actalent, investigated, and recorded by the client in the Violent Incident Log as required. To the contrary, should Actalent become aware of any incidents or concerns, we will engage the host client.

WORKPLACE VIOLENCE INCIDENT REPORTING PROCEDURE

Actalent will implement the following effective procedures to ensure that:

1. For incidents where the threat of violence is immediate and serious - employees who observe or become aware of an incident or a threat of violence that is immediate and serious should immediately dial 9-1-1 from their cell phone, or any other available phone.
 - Contractors should then report any incident in accordance with instructions provided by the host client.

- Lastly, contractors should reach out to Actalent Health & Safety (1-888-902-SAFE (7233)), or their Actalent account manager or recruiter for awareness, who will then engage Employee Relations.
2. For incidents where there is no immediate threat (e.g., an interior door lock is broken, lighting needs to be replaced etc.) – employees should report incidents in accordance with instructions provided by the host client.

A strict non-retaliation policy is in place, and any instances of retaliation are dealt with swiftly and decisively. Those that are found to have engaged in retaliatory conduct may be subject to discipline, up to and including immediate termination.

EMERGENCY RESPONSE PROCEDURES

Actalent 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 sounding building alarms. These could be audible alarms, visual alarms, or both.
- Evacuation and sheltering plans include maps of evacuation routes and locations of emergency exits.
- Obtain help from law enforcement by dialing 9-1-1 in the event of an emergency.

WORKPLACE VIOLENCE HAZARD IDENTIFICATION AND EVALUATION

Contractors who identify hazards on the host client worksite should report them in accordance with the host client's Workplace Violence Prevention Program. Contractors who do not receive a response from their client supervisor can escalate their inquiry to Actalent Health & Safety by calling 1-888-902-SAFE (7233).

WORKPLACE VIOLENCE HAZARD CORRECTION

Workplace violence hazards should be evaluated and corrected in a timely manner by the host client. Contractors who do not receive a response from their client supervisor, or who have concerns over hazard correction on a client worksite, can escalate their inquiry to Actalent Health & Safety by calling 1-888-902-SAFE (7233).

PROCEDURES FOR POST INCIDENT RESPONSE AND INVESTIGATION

Workplace incidents occurring on a host client's worksite should be responded to, investigated and reported on (as required), by the host client.

TRAINING AND INSTRUCTION

All contractors will receive training and instruction on general and job-specific workplace violence practices. General practices will be provided by Actalent, and job-specific practices will be provided by the host client. These sessions could involve training documents, presentations, discussions, and practical exercises. Training and instruction will be provided as follows:

- When the WVPP is first established.
- Annually
- 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.

Actalent will provide its employees with training and instruction on the key definitions found in the WVPP and the requirements listed below:

- Actalent' Contractor WVPP and the host client WVPP, and how to obtain copies at no cost.
- How to participate in the development and implementation of Actalent' WVPP.

- The right to voice concerns to Actalent, the host client, or law enforcement without fear of reprisal.
- How to escalate reports of workplace violence incidents or hazards when the host client is unresponsive.
- 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 Actalent has for interactive questions and answers with a person knowledgeable about the Actalent plan.
- How to recognize workplace violence warning signs indicated by behavior or comments.
- Strategies to avoid/prevent workplace violence and physical harm, such as being aware of your environment and knowing where the nearest exits/escape routes are.
- How to respond when there is a workplace violence incident.
- How to recognize alerts, alarms, or other warnings about emergency conditions and how to use identified escape routes or locations for sheltering.

EMPLOYEE ACCESS TO THE WRITTEN WVPP

Actalent ensures that the Actalent Contractor WVPP plan shall be in writing and available and easily accessible to employees, authorized employee representatives, and representatives of Cal/OSHA. This will be accomplished by having copies available upon request to Actalent Health & Safety by calling 1-888-902-SAFE (7233).

RECORDKEEPING

Actalent will:

- 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 job titles of all people attending the training sessions.
- Maintain violent incident logs for minimum of five (5) years.
- Maintain records of workplace violence incident investigations for at least 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 Actalent 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 Actalent' WVPP should include, but is not limited to:
 - 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 properly identified, evaluated, and corrected. Any necessary revisions are made promptly and communicated to all employees. [These revisions could involve changes to procedures, updates to contact information, and additions to training materials.]

EMPLOYER REPORTING RESPONSIBILITIES

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

"I, Bill Swinburne, Head of Global Security for Allegis Group, 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 ensuring the safety and well-being of our employees and believe that these policies and procedures will help us achieve that goal."

"I, Rebecca Williams, Health & Safety Program Manager for Actalent, 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 ensuring the safety and well-being of our employees and believe that these policies and procedures will help us achieve that goal."



Bill Swinburne, Head of Global Security, Allegis Group

July 19, 2024
Date



Rebecca Williams, Health & Safety Program Manager, Actalent

July 19, 2024
Date

Violent Incident Log

This log must be used for every workplace violence incident that occurs in our workplace. At a minimum, it will include the information required by LC section 6401.9(d).

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

[Enter the date the incident occurred (Day, Month, Year)]

[Enter the time (or approximate time) that the incident occurred] a.m./p.m.

Location(s) of Incident	Workplace Violence Type (Indicate which type(s) (Type 1, 2,3,4))
[Enter location(s) where the incident occurred]	[Enter the workplace violence type(s)]

Check which of the following describes the type(s) of 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.
- Animal attack.
- Other.

Explain: [Provide a detailed description of the incident and any additional information on the violence incident type and what it included. Continue on separate sheet of paper if necessary.]

[_____

_____]

Did the severity of the injuries require reporting to Cal/OSHA? If yes, document the date and time this was done, along with the name of the Cal/OSHA representative contacted.

A copy of this violent incident log needs to be provided to the employer. Indicate when it was provided and to whom.

This violent incident log was completed by:

[Name of person completing this log], [Job Title of person completing this log], [Date this log was completed]

[Signature of person completing this log]

[Date of completion]