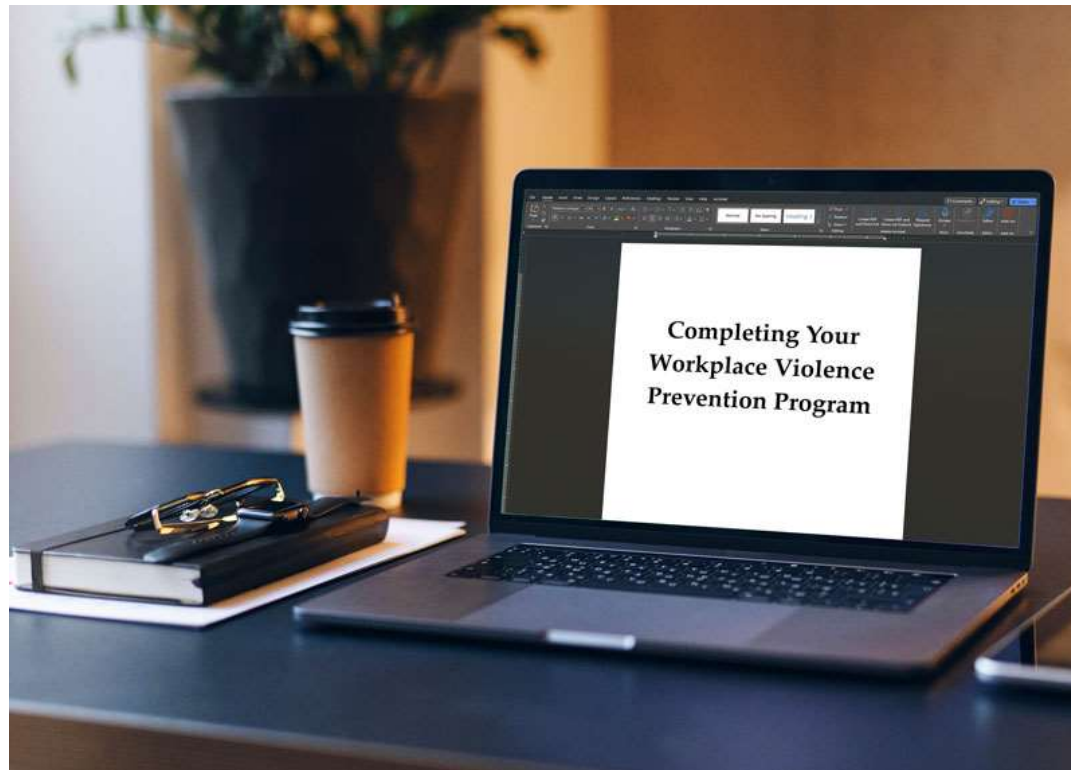


Completing Your Workplace Violence Prevention Program



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Agenda

- Workplace Violence Prevention Requirements.
- Workplace Violence Prevention Plan Development Within Your Organization.
- Creating and Implementing a Training Program.
- Responding to Workplace Violence Incidents.
- The Workplace Violence Toolkit and Recordkeeping.

Workplace Violence Prevention Requirements

Workplace Violence Prevention Standards

- Applies to most California employers except:
 - Health care employers subject to the Violence Prevention in Health Care regulation.
 - Employees teleworking from a location of the employee's choice outside of the employer's control.
 - Workplaces with less than 10 employees at any given time that is not accessible to the public.
- Effective July 1, 2024, all covered employers must:
 - Implement a workplace violence prevention plan;
 - Train employees on your plan;
 - Record incidents; and
 - Keep records.

Workplace Violence Prevention Plan

- All covered employers must create a written workplace violence prevention plan.
- The plan may be a standalone document or may be integrated with an employer's existing Injury and Illness Prevention Program (IIPP).
- Many components are required in the plan, each with a varying level of detail required.
- You may utilize the *Model Workplace Violence Prevention Plan for General Industry* to assist with this process.

Workplace Violence Prevention Plan Components

- Name(s) or job title(s) of person(s) responsible for plan administration.
- Effective procedures to get employee input on plan development.
- Multi-employer site procedures.
- Reporting and responding to workplace violence procedures.
- Procedures to ensure employee compliance.
- Effective communication with employees regarding the plan procedures for reporting and investigating workplace violence incidents.

Workplace Violence Prevention Plan Components, Cont.

- Workplace violence emergency response procedures.
- Development and provision of employee training.
- Procedures to identify and evaluate workplace violence hazards.
- Procedures to correct workplace violence hazards.
- Procedures for post-incident response and investigation.
- Procedures to review and revise the prevention plan as needed.

Training Requirements

- Employers must provide effective training on their workplace violence prevention plan.
- Training materials must be appropriate in content and vocabulary to the educational level, literacy and language of your employees.
- Training must be provided at the following times:
 - When the prevention plan is first established.
 - Annually, thereafter.
 - Whenever changes to the plan or a new hazard is identified. The training in this case may be limited to the plan change or new hazard.
- Training may be provided by anyone, but the trainer should have expertise on your specific prevention plan in order to answer questions.

Training Topics

- The prevention plan, including how to get a free copy and how employees may participate in its development and implementation.
- Key definitions.
- How to report workplace violence incidents and concerns.
- Hazards that exist specific to the workplace and job duties; how to mitigate those hazards; and how employees can seek assistance to prevent or respond to violence and avoid physical harm.
- The violent incident log, and how to obtain copies of prior logs, training records and records related to hazard identification, evaluation and correction.
- Interactive Q&A with someone knowledgeable about the prevention plan.

Recording Incidents

- A workplace violence incident log must be created for every workplace incident, as defined. You may use the *Workplace Violence Incident Log*.
- Employers fill out the log based on the post-incident investigation.
- Employers must omit any element of personal identifying information sufficient to allow identification of any person involved in a violent incident.
- At multi-employer worksites, the employer whose employees experienced violence completes the log. The controlling employer gets a copy.

Recordkeeping

- For five years, you must keep the following:
 - Records of hazard identification, evaluation and correction.
 - Violent incident logs.
 - Records of workplace violence incident investigations.
- For at least one year, you must keep training records:
 - Contents of training, who conducted the training and roster of attendees with job titles and dates attended.
- Records must be made available to the California Division of Occupational Safety and Health (Cal/OSHA) upon request.
- Records, except post-incident investigation records, must be made available to employees and their representatives for examination and copying within 15 days of request.

Workplace Violence Prevention Plan Development Within Your Organization

Inspections To Address Hazards

- The plan should identify the name(s) or job title(s) of the person(s) responsible for inspections under the plan.
- The initial inspection should attempt to discover any existing workplace violence hazards and existing mitigation strategies to determine the scope of the plan.
- Several aspects of your environment to consider when inspecting your workplace are:
 - The property and surrounding environment.
 - Personnel and scheduling.
 - Interactions with the public.
 - Existing security measures and procedures.
 - Existing plan for emergency response.

Inspecting The Property And Surrounding Environment

- When inspecting your physical environment, consider the following:
 - Your workplace's physical layout, including proximity to other residences and businesses, and public access.
 - Attractiveness to criminal activity, such as the presence of cash or other valuable property on site.
 - Prior criminal activity either near or in your workplace.
- Identify existing violence mitigation measures, such as:
 - Surveillance cameras.
 - Access management and other physical barriers.
 - Illumination of the property.
 - Alarms and/or PA systems.
 - Onsite security personnel.

High Heat BBQ Co.

- High Heat BBQ Co. manufactures barbecue equipment and sells it directly to consumers.
- High Heat has two worksites — a manufacturing plant and a sales showroom in an office building — that are about a quarter mile apart, but they're on the same plot of land within a mixed-use district.
- Two attempted overnight break-ins have occurred at the manufacturing plant in the last year, but the sales building has never experienced a crime.
- Must we perform physical inspections for both buildings? What if they were located on two separate plots of land across town from each other?
- If we are performing inspections, what are we looking for at each facility?

High Heat BBQ Co. Periodic Inspection Plan

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 when the WVPP is first established, after each workplace violence incident, and whenever the company is made aware of a new or previously unrecognized hazard.

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

Name/Job Title	Department/Location
Manufacturing Plant Foreman	All exterior and interior areas of the manufacturing plant, including the adjacent parking lot and access road.
Human Resources Director	All exterior and interior areas of the sales building, including the adjacent parking lot. The perimeter of the property and all other empty areas of the property.

High Heat BBQ Co. Location Inspections

- Sales building inspection results show:
 - A small parking lot with a few streetlamps.
 - Two entrances to the building: A public entrance that's unlocked during business hours and a back employee entrance accessed by physical key. During inspection, the employee entrance was propped open and, once inside, a person may access any part of the building.
 - The sales floor's many large exterior windows used to showcase BBQ models. Sales and admin staff work in cubicles and offices adjacent to the sales floor.
 - An alarm system that's activated when no one is present but no surveillance cameras.

High Heat BBQ Co. Location Inspections, Cont.

- Manufacturing plant inspection results show:
 - A large employee parking lot with no lighting and no security gate that's adjacent to a public street.
 - A service road around the building that's accessible from the public street and used for deliveries and transit between the two buildings.
 - One main entrance for employees and vendors that requires a badge; vendors are "buzzed" in by staff.
 - Several roller doors that may only be opened from the inside as needed and no windows.
 - An alarm system that may be activated when no one is present and a surveillance camera on every exterior wall.
 - Once inside the building, a person may access any part of the building without a badge or key.

High Heat BBQ Co. Location Inspections For Hazard Assessment

Inspections for workplace violence hazards include assessing:

- The exterior and interior of the manufacturing plant for theft due to the presence of high value machinery and raw materials.
- The exterior and interior of the sales building for its potential for theft due to the presence of cash and products onsite.
- How customers interact with employees while inside the sales building.
- The number of workers at the manufacturing plant and whether there are risk factors associated with the number of employees present at any time or the hours worked.
- The number of workers at the sales building and whether there are risk factors associated with the number of employees present at any time or the hours worked.
- The effectiveness of the four existing surveillance cameras at the manufacturing plant.
- The need for new surveillance cameras at the manufacturing plant.
- The need for new surveillance cameras at the sales building.
- The effectiveness of existing badge access management system at the manufacturing plant, and any violations or circumvention of those security procedures by employees or members of the public, whether intentional or unintentional.
- The effectiveness of existing door locks for both the front and back doors at the sales building, and any violations or circumvention of those security procedures by employees or members of the public, whether intentional or unintentional.
- Procedures for reporting suspicious or unusual activities or persons.
- Posting of emergency contact information for law enforcement, security and emergency services.
- Whether employees have effective escape routes from the workplace.
- Whether employees have a designated safe area where they can go in an emergency.

When a hazard has been identified, the company will analyze the hazard in coordination with appropriate persons, such as employees, management personnel, security services and/or law enforcement personnel, in order to identify timely methods to correct the hazard.

High Heat BBQ Co. Location Inspection Mitigation Concerns

- Sales building concerns?
 - Although the employee entrance requires a key, there may be a consistent practice of propping the entrance open.
 - A public entrance that is always open during business hours.
 - The large windows surrounding the sales showroom means products are viewable from the public street.
 - No surveillance cameras.
- Manufacturing building concerns?
 - No lighting around a large parking lot.
 - Access to and through the service road.
 - Access to every part of the building once inside.
 - Current mitigation measures like surveillance cameras have not prevented break-in attempts.

High Heat BBQ Co. Personnel And Scheduling

- Sales and admin personnel and scheduling:
 - Showroom business hours are 10 a.m. to 7 p.m. daily, during which at least five to six sales employees are present.
 - The sales manager is there until 9 p.m.
 - Fourteen administrative staff members typically work 8 a.m. to 5 p.m., Monday through Friday.
- Manufacturing personnel and scheduling:
 - Several shifts run and overlap throughout each day of the week, but from 3 a.m. to 6 a.m., no one is present.
 - Approximately 10 employees are present at any given time, except from 12 a.m. to 3 a.m., when only three are present.
 - When the two break-ins occurred in the last year, only one staff member was on shift.
- Concerns in nighttime staffing given when the two break-ins occurred. What mitigation and further information might help?

High Heat BBQ Co. Public Interactions

- Sales building.
 - The general public may enter the building to shop and purchase BBQ equipment during business hours.
 - During a sale, the customer may pay by credit card, debit card or cash at a register near the front door.
 - Mail and deliveries are left with the sales manager.
 - Administrative staff typically doesn't interact with the public.
- Manufacturing plant.
 - The general public has no business at the plant.
 - Only vendor deliveries should take place at the plant through either the main door or, if it's a large truck, the roll-up doors.
- Although no criminal activity has ever taken place at the sales building, are there concerns given the public interactions? Are there mitigation measures to consider?

Gaining Employee Input

- A key requirement in developing and maintaining the plan is soliciting input from employees regarding hazard identification and mitigation.
- You may use the *Workplace Violence Prevention Plan Development Form* and the *Workplace Violence Hazard Identification Form* to solicit input.
- Other options for input include:
 - Regular safety meetings.
 - One-on-one interviews.
 - Other reporting mechanisms, such as anonymous surveys or emails.

High Heat BBQ Co. Sales Building Employee Input

- High Heat provided the *Workplace Violence Hazard Identification Form* to all employees and received the following feedback from the administrative and sales staff:
 - Two administrative employees expressed concerns that the public can access the showroom-adjacent administrative offices, as several customers have been seen wandering the hallways (who say they're looking for the bathroom).
 - They recommended adding a lock to the door from the sales showroom to the administrative offices.
 - The sales manager, present after business hours, regularly sees individuals peering through the large sales showroom windows at the inventory, but has not experienced an attempted break-in.
 - The manager suggested installing blinds or roll down screens so people can't see in at night.

High Heat BBQ Co. Manufacturing Plant Employee Input

- High Heat received the following feedback on the *Workplace Violence Hazard Identification Form* from employees in the manufacturing plant:
 - Two separate workers expressed concerns about a coworker who has a fascination with weapons and has made statements that if he isn't "treated right," he will "make the company pay."
 - The workers provided no mitigation suggestions.

Internal Reporting

- The plan must describe how employees report incidents, threats or concerns internally or to law enforcement. You may utilize the *Workplace Violence Incident Reporting Form* to help with this.
- The plan reporting procedure must include a statement that the employee is protected from retaliation for making the report.
- The plan reporting procedure must also include how the employee's report will be investigated and how the employer will inform employees of the investigation results.

Incident Response

- The plan must detail procedures for responding to actual or potential emergencies, including:
 - Effective means for alerting employees of the presence, location and nature of a workplace violence emergency.
 - Developing evacuation or shelter plans appropriate and feasible for the workplace.
 - How to obtain help from staff assigned to respond to workplace violence emergencies; security, if available; or law enforcement.
- The plan must also address what the employer will do post-incident, including investigation of the incident.

High Heat BBQ Co. Emergency Incident Response Measures

- The inspections and employee feedback indicate that emergency response protocols regarding the break-ins must be addressed.
 - Upon investigation of both break-ins, the sole employee directly confronted the individuals trying to break in to scare them off.
 - Are there better mitigation procedures? An escape route instead? On-site security to contact? Instructions to contact law enforcement?

High Heat BBQ Co. Emergency Incident Response Measures, Cont.

- The emergency response protocols for individuals staring into the sales showroom after hours must also be addressed.
 - The sales manager claims he just ignores them until they go away, but what if they try to break in? What protocols should be in place? Would a buddy system help?

High Heat BBQ Co. Prevention Plan Emergency Response Measures

Emergency Response Procedures

[Company name] has in place the following specific measures to handle actual or potential workplace violence incidents and emergencies:

- Effective means to alert employees of the presence, location and nature of workplace violence emergencies by the following:
 - Audio and visual alarms installed at both the manufacturing plant and the sales building.
 - A panic button system that will manually trigger the audio and visual alarm as well as send alerts to company-issued communication devices.
 - Verbal communication will also be used when effective.
- High Heat BBQ Co. maintains the following evacuation or sheltering plans.
 - See evacuation route maps for each of the manufacturing plant and sales building attached to this plan and posted in the break rooms of both buildings.
- Employees can obtain help from staff, security personnel or law enforcement through the following means:
 - In the event of an emergency, including a workplace violence emergency, call for emergency assistance by dialing 911 (dial outside access number first if applicable).
 - Then, when it is safe to do so, notify the WVPP Administrator:

Job Title/Position	Name	WVPP Responsibilities	Phone/ Ext. Number	Email
General Manager	Michael Scott	Responsible for emergency response, hazard identification and mitigation, <u>training</u> and communication with employees regarding the WVPP.	(888)-555-1234	Michael.Scott@highheatbbq.com

- Contact information for response staff and local law enforcement is posted with the *Workplace Violence Contact Information* form in the following common areas:
 - The break room in each of the manufacturing plant and the sales building.

Employee Compliance

- The plan must include methods for ensuring compliance, such as:
 - Recognition and reward of safe practices, such as regular safety awards and incentives.
 - Discipline, up to and including termination of employment, for unsafe practices.
 - Consistent reminders through regular safety meetings, retraining on the plan and best practices.

Creating And Implementing A Training Program

Appropriate Training Materials

- You may utilize the *Workplace Violence Prevention Plan Training Template* to assist with creating the training materials.
- The template still must be modified to include information specific to your plan that was developed.
- The template may also need to be modified or translated in another language to ensure comprehension.

Additional Training Materials

- Consider creating visual aids or roleplaying to assist with the training:
 - Evacuation or escape route maps.
 - Postings that include all relevant emergency and nonemergency contact information.
 - Scenarios designed to teach employees how to recognize risk factors associated with the four types of workplace violence.
 - Strategies to defuse hostile or threatening situations, including workplace bullying.

Conducting The Training

- Any individual may conduct the training, even third parties, but they must be sufficiently familiar with your plan to effectively discuss it and answer attendee questions.
- The format is flexible. You may conduct the trainings in person or in webinar format with your entire organization or break them up into groups – the law doesn't specify either way.
- Whichever format used, ensure that the training is interactive, and there is ample opportunity for questions throughout.
- Utilize the *Workplace Violence Prevention Training Record* to capture attendance records.

Responding To Workplace Violence Incidents

What Is “Workplace Violence”?

- Workplace Violence: Any act of violence or threat of violence that occurs in the workplace.
 - Threat or use of force against an employee with a high likelihood of resulting in, or that results in, an injury, psychological trauma or stress.
 - Threat or use of firearm or other dangerous weapon including common objects.
 - Actual injury is not required.
- Workplace violence does not include lawful acts of self-defense or defense of others.

Threatening Violence

- A “threat” is an oral or written statement or any behavioral or physical conduct that conveys, or is reasonably perceived to convey, an intent to cause harm or fear of physical harm with no legitimate purpose.
- Oral or written statements include:
 - Text messages.
 - Social media messages.
 - Other electronic messages or online posts.

Types Of Violence

- The standards provide for different types of workplace violence:
 - Type 1 — Committed by a person with no legitimate business reason at the worksite (e.g., entering the worksite with the intent to commit a crime).
 - Type 2 — Committed by customers, clients, patients, visitors, inmates or students.
 - Type 3 — Committed by another employee or former employee.
 - Type 4 — Committed by a nonemployee who has or is known to have a personal relationship with an employee.
- The types of violence will need to be recorded and may also assist employers with developing an effective plan.

A Third Break-In At High Heat?

- Very shortly after establishing the workplace violence prevention plan, High Heat BBQ experienced a third break-in attempt at the manufacturing plant while two employees were present.
- A few individuals tried breaking through the entry door with concrete blocks. When one staff member approached to investigate, one of the perpetrators waved what appeared to be a gun at her.
- She hit a panic button (a newly installed mitigation measure) that activated the alarm, and then fled along the escape route while calling for her coworker to call the police.
- The coworker called 911 to report the break-in, and then alerted the plan administrator.

Investigating The High Heat Break-In

- Workplace violence prevention plans require procedures for post-incident response and investigation of workplace violence incidents.
- Based on the limited information we have, no one apparently was injured; however, the waving of the weapon toward an employee likely rises to the level of a “threat of violence.”
- This will trigger our requirement to investigate and, if necessary, record the incident.

Investigation Procedures

- A thorough, effective investigation requires several steps:
 - Inspect the scene when safe.
 - Interview or otherwise obtain statements from all involved parties including any witnesses, security staff or law enforcement. You may utilize the *Workplace Violence Incident Report Form* to obtain written statements.
 - Review any available video footage and other tangible evidence, such as electronic messages, photos or other documents.
 - Obtain any law enforcement reports.
 - Evaluate the effectiveness of existing mitigation measures for current risk factors.
 - Based on the findings, determine the likely cause of the incident.
- Once completed, the investigation and its findings, along with any corrective actions, must be documented.

High Heat's Investigation Results

- The concrete blocks used in the attempt are not readily available at the worksite, so they were brought on site by the perpetrators.
- The door sustained several hits and stayed structurally intact.
- The surveillance cameras shows that it was very difficult to see the perpetrators approach the door due to poor lighting, but that they seemed to have no trouble accessing any part of the property.
- The video footage also shows that the perpetrators were not deterred by the panic button.
- Lastly, the video footage shows law enforcement arrived in just a few minutes, and the perpetrators scattered quickly upon hearing their approach.
- In her interview and statement, the employee who had the gun waved at her is very distraught; she believed she was going to be shot and is now afraid to return to working the night shift.

Corrective Actions Following High Heat's Investigation

- The investigation identifies areas where corrective actions likely are needed:
 - Insufficient lighting is still a problem during the night hours, as the perpetrators couldn't be spotted on camera until they were close to the door.
 - Due to the break-in attempt frequency, the building appears to be attractive for criminal activity, plus the perpetrators had easy access. High Heat BBQ may need more access control measures, including fencing or other physical barriers.
 - The panic button and resulting alarm didn't deter the perpetrators, but outside presence from law enforcement did. High Heat may want to consider onsite security during the night hours (in addition to, or alternatively to further, access control measures).
 - An employee is experiencing emotional distress from the incident and may need counseling services and schedule adjustments.

Recording The Incident

- In addition to the investigation report, the law and our workplace violence prevention plan require that we must record any workplace violence incident.
- Use the *Workplace Violence Incident Log* to record incidents.
- Let's fill one out now!

Close The Loop On The High Heat Break-In

- Once the investigation and *Workplace Violence Incident Log* are complete, High Heat BBQ must also review its entire workplace violence prevention plan and make any changes consistent with this investigation and communicate the results to employees.
- For example, if High Heat BBQ decides to add on-site security and fencing around the plant complex that requires an access code for entry, those measures must be added to the plan.
- When the plan is amended, a training requirement kicks in, but only as it pertains to the changes. The training must still provide for an interactive question and answer period.

The Workplace Violence Prevention Toolkit And Recordkeeping

Workplace Violence Prevention Toolkit

- Workplace violence prevention plan development.
 - *Workplace Violence Prevention Checklist.*
 - *Model Workplace Violence Prevention Plan for General Industry.*
 - *Workplace Violence Hazard Inspection Form.*
 - *Workplace Violence Prevention Plan Development Form.*
 - *Workplace Violence Hazard Identification Form.*
 - *Workplace Violence Contact Information.*
- Training.
 - *Workplace Violence Prevention Plan Training Template.*
 - *Workplace Violence Prevention Training Record.*
- Workplace violence incident response.
 - *Workplace Violence Incident Reporting Form*
 - *Workplace Violence Incident Log.*

Access To Records

- The toolkit includes forms and other materials to help you meet the standard's requirements for the workplace violence prevention plan, training, documentation and records.
- Your workplace violence prevention plan must identify the records you will maintain and describe the access provided to both Cal/OSHA and employees.
- While employees, or their representatives, are not required to make a request in any specific way (e.g., verbal or in writing), you should develop procedures and identify personnel responsible to receive and respond to requests.
- As a best practice, records retained under these standards should be kept together — but separate from other records — in order to most efficiently comply with any request.

Questions And Answers



Certificate of Achievement
Completing Your Workplace Violence
Prevention Program
May 16, 2024

(Name)

HRCI Program: 665451 (2.0)

SHRM Activity ID: 24-T2SQ9 (2.0)

A Practice Scenario

- Utilize this scenario to practice your own actions and responses to a potential workplace violence incident:
 - One night at work, the sales manager saw a former romantic partner peering at him through the administrative building's windows. The former partner made gestures that the sales manager found creepy, so he informed the general manager.
 - The general manager asked the sales manager to fill out the *Workplace Violence Incident Reporting Form*.

A Practice Scenario — The Sales Manager's Report

- The sales manager's former romantic partner, who he broke up with six months prior, came on site after business hours.
- She peered through the large sales floor windows and, once she spotted the sales manager, she put her fingers to her eyes, pointed at the sales manager and mouthed, "I'll see you in the parking lot."
- The sales manager didn't respond; he felt threatened, so he retreated to the administrative staffing area until she left.
- Since the break-up, the former partner has been sending emotional and somewhat threatening text messages to the sales manager.
- The sales manager did not contact anyone during the incident and no other witnesses were on site.
- This is the first time the romantic partner came to the worksite since the break-up.

A Practice Scenario — Your Response

- Whether this is a workplace violence incident is unclear, but it may fall under the definition of a workplace violence *threat*.
- What if, instead, the sales manager confronted his romantic partner, and she slapped him in the face causing a welt? This would be a clear workplace violence incident.
- In either case, an investigation is likely warranted.
- What are some issues we might see with the fact pattern?
- What are possible corrective actions?
- What other steps do we need to follow for post-incident response?

A Practice Scenario — Suggested Answers

- Potential workplace violence issues in the facts that we may discover upon investigation of the sales manager's report:
 - The sales manager continues to operate alone after hours, so a potential buddy system may be more effective.
 - The administrative area is now a safe space for employees to retreat to.
 - The windows continue to attract the public after hours.
 - The repeated contact and messaging — and now conduct at the workplace — means an escalating threat.

A Practice Scenario — Suggested Answers, Contd.

- Brainstorming corrective actions
 - It is probably time for some window coverings around the large sales building windows.
 - Because of the continued occurrences of people peering in the windows at night should the sales manager always been accompanied by another employee (“buddy system”).
 - A panic button system for the sales building may scare off the individuals peering in the windows.
 - Is it feasible to remove product from the sales floor to make it less attractive at night?
 - If we still don’t have onsite security, is it time now?
 - Do we cease operations altogether at night?

A Practice Scenario — Suggested Answers, Contd.

- We need to document the investigation, the results and any corrective actions taken.
- Fill out the *Workplace Violence Incident Log* even though
- If we made any changes to workplace violence prevention plan based on the investigation results provide new training to all employees. This training only needs to cover the new changes, it does not have to encompass the whole plan.
- Maintain all records of this incident for at least five years, with records of any training that was conducted after the incident for at least one year.