



Association of Behavior Consultants, Inc.

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INJURY AND ILLNESS PREVENTION PROGRAM/ WORKPLACE VIOLENCE PREVENTION PLAN

Date of Last Review: 06/28/24

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POLICY

Association of Behavior Consultants, Inc. will institute and administer a comprehensive and continuous occupational Injury and Illness Prevention Program (IIPP)/ Workplace Violence Prevention Plan (WVPP) for all employees. The health and safety of the individual employee, whether in the ***office, on the road, or in the community*** takes precedence over all other concerns. Management's goal is to prevent accidents, to reduce personal injury and occupational illness, prevent workplace violence and to comply with all safety and health standards.

I. RESPONSIBILITY

The Safety Program Administrator, **Grace Kent** - (grace@associationofbehavior.com or 707-200-1017) is responsible for the overall management and administration of the Injury and Illness Prevention Program and the Workplace Violence Prevention Plan Policy. Each Supervisor is responsible for implementing the IIPP/WVPP in their work area. A copy of the IIP/WVPP shall be available from each Supervisor. Questions regarding the safety and prevention in the program should be directed to the Supervisor and the Safety Program Administrator.

II. EMPLOYEE COMPLIANCE

Employees who follow safe and healthy work practices will have this recognized and documented on their performance reviews. Employees who are unaware of correct safety and health procedures will be trained or retrained. Please refer to Appendix A for the company's *Code of Safe Practices*.



Willful violations of safe work practices may result in the following disciplinary steps, in accordance with company policies:

- ***Verbal Warning, Written Warning, Suspended Without Pay, Termination.***

III. COMMUNICATION

Matters concerning occupational safety and health will be communicated to employees by written documentation, staff meetings, formal and informal training and posting. Communication from employees to supervisors and/or the safety representatives about unsafe or unhealthy conditions is encouraged and may be verbal or written, as the employee chooses. Individuals reporting these conditions in writing may remain anonymous if so desired.

NO EMPLOYEE WILL BE RETALIATED AGAINST FOR REPORTING HAZARDS OR POTENTIAL HAZARDS OR FOR MAKING SUGGESTIONS RELATED TO SAFETY.

The results of the investigation of any employee safety suggestion or report of hazard will be distributed to all employees affected by the hazard or shall be posted on appropriate bulletin boards, whether they be physical or in the program's Google Drive.

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:

1. New employee orientation includes IIPP/WVPP policies and procedures.
2. Workplace violence prevention training programs.
3. Regularly scheduled meetings that address safety, security issues and potential workplace violence hazards.
4. Effective communication between employees and supervisors about safety and workplace violence prevention and concerns.
5. Posted or distributed safety and workplace violence prevention information.
6. 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.



7. 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 and they will be informed of the results of the investigation and any corrective actions to be taken.

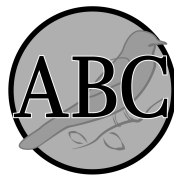
IV. TRAINING

Association of Behavior Consultants oversees multiple programs in different areas of California. Each program operates in its own specific environment, offices and community. Each program will determine and oversee its own training for workplace safety, types of workplace violence and violence hazards.

- A. The Program Administrator or designee shall assure that supervisors receive training to familiarize them with the safety and health hazards to which employees under their immediate direction and control may be exposed.
- B. Supervisors are responsible to see that those under their direction receive training on general workplace safety as well as specific instructions with regard to hazards unique to any job assignment. Safety meetings will be held as needed.
- C. 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.

This training is provided:

- 1. To all employees and those given new job assignments for which training has not previously been received.
- 2. Whenever new substances, processes, procedures or equipment are introduced to the workplace and represent a new hazard; and
- 3. Whenever the employer is made aware of a new or previously unrecognized hazard.
- 4. Upon the initial implementation of the WVPP.



5. The training will be reviewed and, depending on the severity of the incident, updated after any workplace violence incident.

When a supervisor is unable to provide the required training they should request such training be given to the employee by notifying their supervisor. Any additional questions may be directed to the Safety Program Administrator..

V. INSPECTIONS

An appropriately designated person will inspect all applicable ABC facilities in order to identify unsafe work conditions and practices. These inspections will occur:

1. Upon Implementation of IIPP/WVPP and reviewed quarterly.
2. Whenever new substances, processes, procedures or equipment are introduced into the workplace that represent a new occupational safety and health hazard; and
3. Whenever the Supervisor/Safety Representative is made aware of a new or previously unrecognized hazard.
4. Whenever a workplace violence incident has occurred in an area where an employee has been affected.

VI CORRECTION OF UNSAFE OR UNHEALTHY CONDITIONS

Whenever an unsafe or unhealthy condition, practice, or procedure is observed, discovered, or reported, the Program Manager or designee will take appropriate corrective measures in a timely manner based upon the severity of the hazard. Employees will be informed of the hazard and interim protective measures taken until the hazard is corrected.

Employees may not enter an ***imminent hazard*** area, without appropriate protective equipment, training, and the prior specific approval of the Program Administrator or designee.

VII. INJURY AND ILLNESS INVESTIGATION



Occupational injuries and illness will be investigated in accordance with established procedures and documented.

VIII. RECORDKEEPING

The following activities will be documented on an on-going basis:

- Safety training - specifically for new-hire orientation, new processes or equipment, and for implementation of this written Injury and Illness Prevention Program.
- Inspections of all facilities and equipment.
- Regularly-scheduled safety meetings.
- Accident Investigations.
- OSHA 300 log
- Workplace Violence Incident Log
- Minutes of Safety Committee Meetings

This documentation will be located in the company's Google Drive, and will be maintained by the Program Administrator or designee for a minimum of (3) years. For access

Association of Behavior Consultants ensures that the IIPP/ 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 providing unobstructed access through a company server or website, which allows an employee to review, print, and email the current version of the written IIPP/WVPP. For access to the most updated version email the Safety Program Administrator at grace@associationofbehavior.com or contact your program supervisor to request the Google Drive link.

When you have an accident, everyone loses; you, your family, your fellow workers and the company. Please work safely. It's good for everyone.

IX. WORKPLACE VIOLENCE



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 [Labor Code \(LC\) section 6401.9](#).

The purpose of this policy is to minimize the risk of personal injury to employees and damage to the company and personal property.

Association of Behavior Consultants Inc. does not expect employees to become experts in psychology or to physically subdue a threatening or violent individual. Indeed, Association of Behavior Consultants Inc. specifically discourages employees from engaging in any physical confrontation with a violent or potentially violent individual. However, Association of Behavior Consultants Inc. does expect and encourage employees to exercise reasonable judgment in identifying potentially dangerous situations.

Experts in the mental health profession state that prior to engaging in acts of violence, troubled individuals often exhibit one or more of the following behaviors or signs: over-resentment, anger and hostility; extreme agitation; making ominous threats such as bad things will happen to a particular person, or a catastrophic event will occur; sudden and significant decline in work performance; irresponsible, irrational, intimidating, aggressive or otherwise inappropriate behavior; reacting to questions with an antagonistic or overtly negative attitude; discussing weapons and their use, and/or brandishing weapons in the workplace; overreacting or reacting harshly to changes in Company policies and procedures; personality conflicts with co-workers; obsession or preoccupation with a co-worker or supervisor; attempts to sabotage the work or equipment of a co-worker; blaming others for mistakes and circumstances; or demonstrating a propensity to behave and react irrationally.

A. Prohibited Conduct

Threats, threatening language or any other acts of aggression or violence made toward or by any company employee **WILL NOT BE TOLERATED**. For purposes of this policy, a threat includes any verbal or physical harassment or abuse, any attempt at intimidating or instilling fear in others, menacing gestures, flashing of weapons, stalking or any other hostile, aggressive, injurious or destructive action undertaken for the purpose of domination or intimidation. To the extent permitted by law, employees and visitors are prohibited from carrying weapons on company premises.



B. Procedures for Reporting a Threat

All potentially dangerous situations, including threats by co-workers, should be reported immediately to any member of management with whom the employee feels comfortable. Reports of threats may be maintained confidential to the extent maintaining confidentiality does not impede Association of Behavior Consultants Inc.'s ability to investigate and respond to the complaints. All threats will be promptly investigated by the program and the safety administrator or designee, and logged into the company's *Workplace Violence Incident Log*. All personal information in the log will remain anonymous. If the employee prefers to report a type of workplace violence incident confidentially they can access the *Anonymous Workplace Violence Incident Report Form* <https://forms.gle/wpNwTJyEMnNW36jKA>. All forms will be sent to the Safety Program Administrator and will be logged into the *Workplace Violence Incident Log*. All threats will be promptly investigated and logged into the company's *Workplace Violence Incident Log*. All personal information in the log will remain anonymous.

All employees must cooperate with all investigations. No employee will be subjected to retaliation, intimidation or disciplinary action as a result of reporting a threat in good faith under this policy.

If the Safety Program Administrator and Program Manager or designee determines, after an appropriate good faith investigation, that someone has violated this policy, the company will take swift and appropriate corrective action.

If the employee is the recipient of a threat made by an outside party, that employee should follow the steps detailed in this section. It is important for your program manager to be aware of any potential danger in its offices. Indeed, ABC wants to take effective measures to protect everyone from the threat of a violent act by employees or by anyone else.

C. Workplace Violence Hazard Correction

Workplace violence hazards will be evaluated and corrected in a timely manner. The Program Manager and/or Safety Program Administrator will



implement the following effective procedures to correct workplace violence hazards that are identified:

- If an imminent workplace violence hazard exists that cannot be immediately abated without endangering employee(s), all exposed employee(s) will be removed from the situation except those necessary to correct the existing condition. Employees necessary to correct the hazardous condition will be provided with the necessary protection.
- All corrective actions taken will be documented and dated on the appropriate forms. This includes the Workplace Violence Log and training materials. The IIPP/ WVPP will be reviewed in case of all corrective actions.

- Corrective measures for workplace violence hazards will be specific to a given work area.

Example for the process of events for corrective violence hazards includes:

1. Incident occurs
2. Incident is reported
3. Incident is investigated
4. Incident is logged and evaluated
5. Examine the results and determine what course of correction of the plan is in order
6. Update plan and conduct a follow up meeting with team

D. Coordination With Other Employers

Association of Behavior Consultants will implement the following effective procedures to coordinate implementation of its plan with other employers to ensure that those employers and employees understand their respective roles, as provided in the plan.

- All employees will be trained on workplace violence prevention.
- Workplace violence incidents involving any employee are reported, investigated, and recorded.
- At a multi employer worksite, ABC will ensure that if its employees experience a workplace violence incident that ABC will record the information in a violent incident log and shall also provide a copy of that log to the controlling employer.



Employer Reporting Responsibilities


As required by [California Code of Regulations \(CCR\), Title 8, Section 342\(a\). Reporting Work-Connected Fatalities and Serious Injuries](#), Association of Behavior Consultants 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, _____, Program Manager of _____ at Association of Behavior Consultants, hereby authorize and ensure the establishment, implementation, and maintenance of this written Injury and Illness/ workplace violence prevention plan and the documents/forms within this written plan. I believe that these policies and procedures will bring positive changes to the workflow, business operations, and overall health and safety as it relates to injury and illness/ workplace violence prevention.”

“I, Grace Kent, Administrator of Human Resources of Association of Behavior Consultants, hereby authorize and ensure the establishment, implementation, and maintenance of this written Injury and Illness/ workplace violence prevention plan and the documents/forms within this written plan. I believe that these policies and procedures will bring positive changes to the workflow, business operations, and overall health and safety as it relates to injury and illness/ workplace violence prevention.”

Program Manager

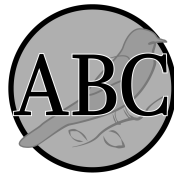
Date



Grace Kent, HR - Safety Program Administrator

06/28/2024

Date



INJURY AND ILLNESS, AND WORKPLACE VIOLENCE PREVENTION PROGRAM

Association of Behavior Consultants, Inc.

ACKNOWLEDGEMENT OF RECEIPT AND REVIEW OF IIPP AND CODE OF SAFE PRACTICES

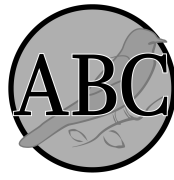
TO ALL EMPLOYEES:

YOU HAVE HAD AN OPPORTUNITY TO REVIEW THIS PACE SUPPLY CORPORATION ***INJURY AND ILLNESS PREVENTION PROGRAM/WORKPLACE VIOLENCE PREVENTION PLAN***. ATTACHED IS A COPY OF THE CODE OF SAFE PRACTICES, TAKEN FROM THIS PROGRAM. THESE GUIDELINES ARE PROVIDED FOR YOUR SAFETY.

*It is the responsibility of the **Program Manager** to provide and review this code with each employee, as well as to answer any questions about the IIPP/WVPP. It is the employee's responsibility to read and comply with this code.*

I have had an opportunity to review and discuss with the above person, the IIPP/WVPP, and have read and understood the *Code of Safe Practices*.

DATE _____ SIGNATURE _____
Employee



Association of Behavior Consultants, Inc.

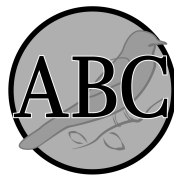
Appendix A

CODE OF SAFE PRACTICES

Association of Behavior Consultants Inc. is strongly committed to providing a safe workplace. It is our policy that everything possible will be done to protect employees, customers and visitors from accidents. Safety is a cooperative undertaking requiring participation by every employee. Failure by any employee to comply with safety rules will be grounds for corrective discipline. Supervisors shall insist that employees observe all applicable Company, State and Federal safety rules and practices and take action as is necessary to obtain compliance.

To carry out this policy employees shall:

1. Review safety procedures.
2. Participate in safety meetings.
3. Practice safety procedures diligently when in the field.
4. Report any injuries or dangerous events directly to their supervisor, program manager and/or safety program administrator.



DEFINITIONS

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

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.

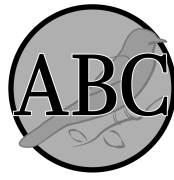
Threat of violence - Any verbal or written statement, including, but not limited to, texts, electronic messages, social media messages, or other online posts, or any behavioral or physical conduct, that conveys an intent, or that is reasonably perceived to convey an intent, to cause physical harm or 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 which are used to effectively reduce workplace violence hazards.

