



WORKPLACE VIOLENCE PREVENTION PROGRAM for Parkpoint Clubs, LLC

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](#).

Date of Last Review: July 1, 2024

Date of Last Revision(s): July 1, 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 which are used to effectively reduce workplace violence hazards

RESPONSIBILITY

The WVPP administrator, **Julie O'Malley, Human Resources Manager** has the authority and responsibility for implementing the provisions of this plan for Parkpoint Clubs, LLC. If there are multiple persons responsible for the plan, their roles will be clearly described.

Responsible Persons	Job Title/Position	WVPP Responsibility(ies)	Phone #	Email
Julie O'Malley	HR Manager	Responsible for employee involvement and training; Julie manages WVPP; updates training materials and handles any reports of workplace violence and incident log.	707-860-6101	julie@parkpointhealthclub.com
Patsy Love Santa Rosa	Club Mgr	1 st incident contact at Santa Rosa Club, including notifying staff, evacuation and training	707-953-0383	Patsy@parkpointhealthclub.com
Annie Kruitof Sonoma	Operations Mgr	1 st incident contact at Sonoma Club, including notifying staff, evacuation and training	707-996-3111	Annie@parkpointhealthclub.com
Jan Blalock Healdsburg	Programming & Operations Mgr	1 st incident contact at Healdsburg Club, including notifying staff, evacuation and training	707-385-2500	jan@parkpointhealthclub.com

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

EMPLOYEE ACTIVE INVOLVEMENT

Parkpoint Clubs, LLC ensures the following policies and procedures to obtain the active involvement of employees and authorized employee representatives in developing and implementing the plan:

- Management will work with and allow employees and authorized employee representatives to participate in:
 - Identifying, evaluating, and determining corrective measures to prevent workplace violence.

Management will include WVPP discussions in Staff Meetings to discuss identification of workplace violence related concerns/hazards, evaluate those hazards and/or concerns, and how to correct them. These meetings could involve brainstorming sessions, discussions of recent incidents, and reviews of safety procedures.]
 - Designing and implementing training

Employees are encouraged to offer their suggestions in designing and implementing training programs and materials. For example, an employee might suggest a new training scenario based on a recent incident
- Reporting and investigating workplace violence incidents
 - All incidents of workplace violence should be reported to Julie O'Malley, HR Manager, the Club Manager, and the General Manager as soon as possible. Management will ensure that all workplace

violence policies and procedures within this written plan are clearly communicated and understood by all employees. Managers and supervisors will enforce the rules fairly and uniformly.

- All employees will follow all workplace violence prevention plan directives, policies, and procedures, and assist in maintaining a safe work environment.
- The plan shall be in effect at all times and in all work areas and be specific to the hazards and corrective measures for each work area and operation.

EMPLOYEE COMPLIANCE

Our system 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, supervisors, and managers in the provisions of Parkpoint Clubs, LLC Workplace Violence Prevention Plan (WVPP)
- Effective procedures to ensure that supervisory and nonsupervisory employees comply with the WVPP. Parkpoint Clubs, LLC WVPP will be distributed to supervisors (in HR Binder) , and it will posted to our Employee Staff Resource page attached to our Injury/Illness Prevention Plan
- Provide retraining to employees whose safety performance is deficient with the WVPP.
- Recognizing employees who demonstrate safe work practices that promote the WVPP in the workplace by **emails of recognition by the HR Manager, the Club Manager or the General Manager.**
- Discipline employees for failure to comply with the WVPP. (You can either refer to Parkpoint Clubs, LLC existing discipline process or outline specific steps for the WVPP)

COMMUNICATION WITH EMPLOYEES

We recognize that open, two-way communication between our management team, staff, and other employees, 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 employee orientation includes workplace violence prevention policies and procedures.
- Discussed at Staff Meetings at each club; Regularly scheduled meetings that address security issues and potential workplace violence hazards
- Effective communication between employees and supervisors about workplace violence prevention and violence concerns. Communication will be in-person or via email to All Staff.
- Employees can anonymously report a violent incident, threat, of other violence concerns.
- **Contact:**
- **Emergency: Dial 9-1-1**
- **Notify: Julie O'Malley, 707-860-6101**
- 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. Employees will be notified as soon as possible and at the most appropriate time.

Updates on the status of investigations and corrective actions are provided to employees through email and at safety meetings. These updates could include information about the progress of investigations, the results of investigations, and any corrective actions taken.

COORDINATION WITH OTHER EMPLOYERS

Parkpoint Clubs, LLC will implement the following effective procedures to coordinate the 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 multiemployer worksite, Parkpoint Clubs, LLC will ensure that if its employees experience workplace violence incident that Parkpoint Clubs, LLC will record the information in a violent incident log and shall also provide a copy of that log to controlling employer.

WORKPLACE VIOLENCE INCIDENT REPORTING PROCEDURE

Parkpoint Clubs, LLC will implement the following effective procedures to ensure that:

- All threats or acts of workplace violence are reported to an employee's supervisor or manager, who will inform the WVPP administrator. This will be accomplished by phone call, text or email. If that's not possible, employees will report incidents directly to the WVPP administrator, Julie O'Malley, Human Resources Manager.
- Employees can also report incidents to their Club representative or Direct Supervisor.

To report a concern/comment/question confidentially please contact:

Julie O'Malley
HR Manager
julie@parkpointhealthclub.com
707-860-6101

A strict non-retaliation policy is in place, and any instances of retaliation are dealt with swiftly and decisively. An employee who retaliates against a coworker for reporting an incident could face discipline or termination.

EMERGENCY RESPONSE

Parkpoint Clubs, LLC has in place the following specific measures to handle actual or potential workplace violence emergencies:

- CALL 9-1-1 and then notify the Club representative and WVPP Administrator).
- Overhead PA announcements will be used to alert employees of emergencies.
- Parkpoint Clubs, LLC will have evacuation or sheltering plans (Each Club has evacuation and sheltering location plans)

In the event of an emergency, including a Workplace Violence Emergency, contact the following:

Responsible Persons	Job Title/Position	WVPP Responsibilities	Phone #	Email
Julie O'Malley	HR Manager WVPP Administrator	Responsible for employee involvement and training; Julie manages WVPP; updates training materials and handles all reports of workplace violence and incident log.	707-860-6101	Julie@parkpointhealthclub.com
Patsy Love Santa Rosa	Club Manager	1 st incident contact at Santa Rosa Club, including notifying staff, evacuation and training	707-953-0383	patsy@parkpointhealthclub.com
Annie Kruitof Sonoma	Operations Manager	1 st incident contact at Sonoma Club, including notifying staff, evacuation and training	707-996-3111	annie@parkpointhealthclub.com
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WORKPLACE VIOLENCE HAZARD IDENTIFICATION AND EVALUATION

The following policies and procedures are established and required to be conducted by Parkpoint Clubs, LLC to ensure that workplace violence hazards are identified and evaluated:

- Inspections shall be conducted when the plan is first established, after each workplace violence incident, and whenever the employer is made aware of a new or previously unrecognized hazard.

Review all submitted/reported concerns of potential hazards: Submittals from online reporting form, verbal notification, email, phone call or text.

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 quarterly by WVPP Administrator and/or Club representative.

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:

Specific Person Name/Job Title	Area/Department/Specific location
Julie O'Malley, Human Resources Manager	All Clubs
Patsy Love, Club Manager	Santa Rosa
Jan Blalock, Program/ Operations Mgr.	Healdsburg
Annie Kruitof, Operations Mgr.	Sonoma

Inspections for workplace violence hazards include assessing:

- Check exterior of buildings for areas of vulnerability.
- Check if cameras, alarms and locks are functioning.
- Check phones to make sure outside line is available for emergency contact.
- Check for effective escape routes from the workplace.
- Ensure the designated area for safety is available.
- Continual training of employees on handling safety threats or hostile encounters.
- Effectiveness of PA system notification in case of a workplace incident.

WORKPLACE VIOLENCE HAZARD CORRECTION

Workplace violence hazards will be evaluated and corrected in a timely manner. Parkpoint Clubs, LLC 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. ****No designated employee will be assigned to correct the hazardous condition unless the situation is deemed completely safe. Law enforcement and a medical response team will be called.*
- All corrective actions taken will be documented and dated on the reporting form and the Workplace Violence Reporting Log (managed by the WVPP Administrator).
- Corrective measures for workplace violence hazards will be specific to each Parkpoint Club (Santa Rosa, Sonoma, Healdsburg).

PROCEDURES FOR POST INCIDENT RESPONSE AND INVESTIGATION

After a workplace incident, the WVPP administrator or the specific Club representative will implement the following post-incident procedures:

- Visit the scene of an incident as soon as safe and practicable.
- Interview involved parties, such as employees, witnesses, law enforcement, and/or security personnel.
- Review security footage of existing security cameras if applicable.
- Examine the workplace for security risk factors associated with the incident, including any previous reports of inappropriate behavior by the perpetrator.
- Determine the cause of the incident.
- Take corrective action to prevent similar incidents from occurring.
- Record the findings and ensuring corrective actions are taken.
- Obtain any reports completed by law enforcement.
- The violent incident log will be used for every workplace violence incident and will include information, Ensure that **no personal identifying information is recorded or documented** in the written investigation

report. This includes information which would reveal identification of any person involved in a violent incident, such as the person's name, address, electronic mail address, telephone number, social security number, or other information that, alone or in combination with other publicly available information, reveals the person's identity.

TRAINING AND INSTRUCTION

All employees, including managers and supervisors, will have training and instruction on general and job-specific workplace violence practices. These sessions could involve presentations, discussions, and practical exercises. Training and instruction will be provided as follows:

- When the WVPP is first established (July 1, 2024)
- Annually to ensure all employees understand and comply with the plan.
- 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.

Parkpoint Clubs, LLC will provide its employees with training and instruction on the definitions found on page 1 of this plan and the requirements listed below:

- The employer's WVPP, how to obtain a copy of the employer's plan at no cost, and how to participate in development and implementation of the employer's plan.
- How to report workplace violence incidents or concerns to the employer or law enforcement without fear of reprisal.
- Workplace violence hazards specific to the employees' jobs, the corrective measures Parkpoint Clubs, LLC has implemented, 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 Parkpoint Clubs, LLC has for interactive questions and answers with a person knowledgeable about the Parkpoint Clubs, LLC plan.

Note: *Employers must use training material appropriate in content and vocabulary to the educational level, literacy, and language of employees.*

EMPLOYEE ACCESS TO THE WRITTEN WVPP

Parkpoint Clubs, LLC ensures that the WVPP plan shall be in writing and shall be available and easily accessible to employees, authorized employee representatives, and representatives of Cal/OSHA at all times. This will be accomplished by:

- We will provide unobstructed access through our company website, which allows an employee to review, print, and email the current version of the written WVPP. The WVPP is accessible at:

<http://www.parkpointhealthclub.com/staff-resources/>

RECORDKEEPING

Parkpoint Clubs, LLC will:

- Create and maintain records of workplace violence hazard identification, evaluation, and correction, for a minimum of **five (5) years**.
- Create and maintain training records for a minimum of one (1) year and include the following:

- Training dates.
- Contents or a summary of the training sessions.
- Names and qualifications of persons conducting the training.
- Names and job titles of all persons attending the training sessions.
- Maintain violent incident logs for minimum of five (5) years.
- Maintain records of workplace violence incident investigations for a minimum of five (5) years.
 - The records shall not contain medical information per subdivision (j) of section 56.05 of the Civil Code.
- All records of workplace violence hazard identification, evaluation, and correction; training, incident logs and workplace violence incident investigations required by [LC section 6401.9\(f\)](#), shall be made available to Cal/OSHA upon request for examination and copying.

EMPLOYEE ACCESS TO RECORDS

The following records shall be made available to employees and their representatives, upon request and without cost, for examination and copying within **15 calendar days of a request**:

- Records of workplace violence hazard identification, evaluation, and correction.
- Training records.
- Violent incident logs.

REVIEW AND REVISION OF THE WVPP

The Parkpoint Clubs, LLCW VPP 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 Parkpoint Clubs, LLC 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](#), Parkpoint Clubs, LLC 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, Julie O'Malley, Human Resources Manager of Parkpoint Clubs, LLC, 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 believe that these policies and procedures will bring positive changes to the workflow, business operations, and overall health and safety as it relates to workplace violence prevention.”

Julie O'Malley, Human Resources Manager

 Recoverable Signature

X Julie O'Malley

Julie O'Malley

Human Resources Manager

Signed by: 999bc81f-8a48-406b-9aaf-71715a77073c