

WORKPLACE VIOLENCE PREVENTION PROGRAM for MarketSource, Inc.

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: September 2024

Date of Last Revision(s): July 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, Deanna Lucas, Human Resources Director, has the authority and responsibility for implementing the provisions of this plan for MarketSource. 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
Deanna Lucas	HR Director	Approves the final plan and any major changes; oversees employee involvement and training related to the plan, including any updates to training materials, and manages any reports of workplace violence.	770-870-1345	dnegreiralucas@marketsource.com
Bill Swinburn	Collectively, the Threat Assessment Team	<i>Conducts safety inspections, coordinates emergency response procedures, and communicates with other employers about the plan.</i>	410-579-6548	wswinburne@allegisgroup.com
Deanna Lucas			770-870-1345	dnegreiralucas@marketsource.com
Stacy Gomes			781-356-6904	sgomes@allegisgroup.com
Local stakeholders				

All managers and supervisors are responsible for implementing and maintaining the WVPP in their work areas and for answering employee questions about the WVPP. Where questions are related to a specific client site, MarketSource will direct employee to appropriate client contact for more information.

EMPLOYEE ACTIVE INVOLVEMENT

MarketSource promotes certain policies and procedures, to the extent required by applicable law, to obtain the active involvement of employees and authorized employee representatives in developing and implementing the plan, which may include the following:

- Management will encourage and allow employees and authorized employee representatives to provide feedback identifying, evaluating, and determining corrective measures to prevent workplace violence by:
 - Designing and implementing training in accordance with applicable law to ensure workplace safety.
 - Reporting and investigating workplace violence incidents. MarketSource employees are provided with instruction on where to raise questions regarding specific client site inquiries/concerns. 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 may include:

- Training employees, supervisors, and managers in the provisions of MarketSource's Workplace Violence Prevention Plan (WVPP).
- Effective procedures to ensure that supervisory and nonsupervisory employees comply with the WVPP.
- Investigating suspected incidents of non-compliance.
- Provide retraining to employees whose safety performance is deficient with the WVPP, if necessary and appropriate.
- Where appropriate, and within MarketSource's sole discretion, discipline employees in accordance with MarketSource's disciplinary procedures for failure to comply with the WVPP.

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 may consist of the following:

- New employee orientation includes workplace violence prevention policies and procedures.
- Workplace violence prevention training programs.
- Regularly scheduled meetings during which security issues and potential workplace violence hazards can be addressed.
- Effective communication between employees and supervisors about workplace violence prevention and violence concerns.
- Posted or distributed workplace violence prevention information.
- 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. The following details should be followed when reporting:
 - **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.
 - All incidents should then also be reported to the Threat Assessment Team (TAT) by telephone to any member of the team. An anonymous report can also be made by calling the Code of Conduct and Ethics Hotline at 866.377.7489.
 - **For incidents where there is no immediate threat** (e.g., an interior door lock is broken, lighting needs to be replaced etc.) – employees should email the Threat Assessment Team (TAT) at the email address for any of the TAT members identified above.
- Employees will have the ability to seek emergency assistance, assess the safety of a situation, or communicate with a person to verify their safety in the event of an emergency.
- 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.

COORDINATION WITH OTHER EMPLOYERS

MarketSource will utilize good faith efforts to implement its plan with its clients, as appropriate, based on a particular client site. This may include:

- All employees being trained on the client's workplace violence prevention plan.
- Where appropriate, workplace violence incidents involving any employee are reported, investigated, and recorded.

- At a multiemployer worksite, MarketSource will ensure that if its employees experience workplace violence incident that MarketSource 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

MarketSource will implement the following effective procedures to ensure that:

- All threats or acts of workplace violence are taken seriously and must be reported to an employee's supervisor or manager or administrator.
- A strict non-retaliation policy is in place in accordance with MarketSource policies, and any instances of retaliation are dealt with swiftly and decisively.

EMERGENCY RESPONSE PROCEDURES

Where appropriate, MarketSource 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.
- MarketSource will make good faith efforts to work with its clients to ensure that such clients have worksite appropriate evacuation or sheltering plans.
- How to obtain help from staff, client contacts, client security personnel, or law enforcement

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

Responsible Persons	Job Title/Position	WVPP Responsibility(ies)	Phone #	Email
Bill Swinburn	Collectively, the Threat Assessment Team	Responsible for emergency response, hazard identification, and coordination with other employers	410-579-6548	wswinburne@allegisgroup.com
Deanna Lucas			770-870-1345	dnegreiralucas@marketsource.com
Stacy Gomes			781-356-6904	sgomes@allegisgroup.com
Local stakeholders				

WORKPLACE VIOLENCE HAZARD IDENTIFICATION AND EVALUATION

The following policies and procedures may be established by MarketSource and/or its client(s) to ensure that workplace violence hazards are identified and evaluated:

- Review all submitted/reported concerns of potential hazards.
- Weekly review of all submitted and reported concerns to the Threat Assessment Team.
- Investigate anonymous complaints made to the Code of Conduct and Ethics Hotline at 866.377.7489 or sent to the corporateethicsofficer@allegisgroup.com email address (please note, emails are not anonymous).

WORKPLACE VIOLENCE HAZARD CORRECTION

Where appropriate, MarketSource will work with clients to ensure that workplace violence hazards are evaluated and corrected in a timely manner. Depending on the circumstances, MarketSource may consider implementing 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.
- MarketSource will partner with its client in good faith to encourage corrective measures for workplace violence hazards are addressed and that they will be specific to a given work area.

PROCEDURES FOR POST INCIDENT RESPONSE AND INVESTIGATION

After a workplace incident, the WVPP administrator or their designee will implement applicable MarketSource post-incident procedures, which may include:

- Interviewing involved parties, such as employees, witnesses, law enforcement, and/or security personnel.
- In partnership with its client(s), reviewing security footage of existing security cameras if applicable.
- Coordinating with its clients to understand security risks associated with the incident that may exist, including any previous reports of inappropriate behavior by the perpetrator.
- Determine the cause of the incident.
- Partnering with its clients to encourage client to take corrective action to prevent similar incidents from occurring.
- Record the findings and ensure corrective actions are taken.
- Obtain any reports completed by law enforcement.

Ensure that no personal identifying information is recorded or documented in the violent incident log. 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

Employees will receive training and instruction on general and job-specific workplace violence practices. General practices will be provided by MarketSource, 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 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 that upon assessment and review require further training. The additional training may be limited to addressing the new workplace violence hazard or changes to the plan.

MarketSource will provide its employees with training and instruction on the key definitions found in this WVPP 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.
- 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 MarketSource has for interactive questions and answers with a person knowledgeable about the MarketSource plan.

EMPLOYEE ACCESS TO THE WRITTEN WVPP

MarketSource ensures that the WVPP plan shall be in writing and shall be available to employees, authorized employee representatives, and representatives of Cal/OSHA at all times. This will be accomplished by providing a copy of the WVPP plan on the MarketSource intranet page. You can also receive a copy of the plan by contacting your HR representative.

RECORDKEEPING

MarketSource 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 MarketSource WVPP will be reviewed as appropriate for effectiveness:

- At least annually.
- When a deficiency is observed or becomes apparent.
- 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 MarketSource's 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, MarketSource 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, Deanna Lucas, Human Resources Director for MarketSource, 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."

Deanna Lucas

Deanna Lucas, Human Resources Director, MarketSource

10/29/2024

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

Date the incident occurred (Day, Month, Year): Click or tap to enter a date.

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

Location(s) of Incident (enter the location(s) where the incident occurred)	Workplace Violence Type (Indicate which type(s) (Type 1, 2,3,4))

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.)

Workplace violence committed by (for confidentiality, only include the classification of who committed the violence, including whether the perpetrator was a client or customer, family or friend of a client or customer, stranger with criminal intent, coworker, supervisor or manager, partner or spouse, parent or relative, or another perpetrator.):

Circumstances at the time of the incident (write/type what was happening at the time of the incident, including, but not limited to, whether the employee was completing usual job duties, working in poorly lit areas, rushed, working during a low staffing level, isolated or alone, unable to get help or assistance, working in a community setting, or working in an unfamiliar or new location.):

Where the incident occurred (where the incident occurred, such as in the workplace, parking lot or other area outside the workplace, or other area.):

Consequences of the incident, including, but not limited to:

- Whether security or law enforcement was contacted and their response.
- Actions taken to protect employees from a continuing threat or from any other hazards identified as a result of the incident.

Include information on what the consequences of the incident were.:

Were there any injuries? Yes or No. Please explain (provide a description of the injuries):

Were emergency medical responders other than law enforcement contacted, such as a Fire Department, Paramedics, On-site First-aid certified personnel? Yes or No. If yes, explain.

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.

Provided to:

Date Provided:

This violent incident log was completed by:

Job Title:

Date Completed: Click or tap to enter a date.

Signature of person completing this log

Date of completion