

WORKPLACE VIOLENCE PREVENTION PROGRAM for Major, Lindsey & Africa (Contract Employees)

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

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

Date of Last Review: June 2024

Date of Last Revision(s): June 2024

DEFINITIONS

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

Engineering controls - An aspect of the built space or a device that removes a hazard from the workplace or creates a barrier between the employee and the hazard.

Log - The violent incident log required by LC section 6401.9.

Plan - The workplace violence prevention plan required by LC section 6401.9.

Serious injury or illness - Any injury or illness occurring in a place of employment or in connection with any employment that requires inpatient hospitalization for other than medical observation or diagnostic testing, or in which an employee suffers an amputation, the loss of an eye, or any serious degree of permanent disfigurement, but does not include any injury or illness or death caused by an accident on a public street or highway, unless the accident occurred in a construction zone.

Threat of violence - Any verbal or written statement, including, but not limited to, texts, electronic messages, social media messages, or other online posts, or any behavioral or physical conduct, that conveys an intent, or that is reasonably perceived to convey an intent, to cause physical harm or to place someone in fear of physical harm, and that serves no legitimate purpose.

Workplace violence - Any act of violence or threat of violence that occurs in a place of employment.

Workplace violence includes, but is not limited to, the following:

- The threat or use of physical force against an employee that results in, or has a high likelihood of resulting in, injury, psychological trauma, or stress, regardless of whether the employee sustains an injury.
- An incident involving a threat or use of a firearm or other dangerous weapon, including the use of common objects as weapons, regardless of whether the employee sustains an injury.
- The following four workplace violence types:

Type 1 violence - Workplace violence committed by a person who has no legitimate business at the worksite and includes violent acts by anyone who enters the workplace or approaches employees with the intent to commit a crime.

Type 2 violence - Workplace violence directed at employees by customers, clients, patients, students, inmates, or visitors.

Type 3 violence - Workplace violence against an employee by a present or former employee, supervisor, or manager.

Type 4 violence - Workplace violence committed in the workplace by a person who does not work there but has or is known to have had a personal relationship with an employee.

Workplace violence does not include lawful acts of self-defense or defense of others.

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

RESPONSIBILITY

The WVPP administrator, Jacqueline Wandrey (Director of Human Resources), has the authority and responsibility for implementing the provisions of this plan for Major, Lindsey & Africa.

Responsible Persons	Job Title/Position	WVPP Responsibility(ies)	Phone #	Email
Jacqueline Wandrey	Director of Human Resources	Overall responsibility for the plan; approves the final plan and any major changes.	707-328-3114	jwandrey@MLAGlobal.com
Christa Ford	National Operations Manager	Responsible for employee involvement and training; communicates with broader employee groups about incidents and updates training materials.	312-896-8562	cford@mлагlobal.com
Jacqueline Wandrey Christa Ford	Health & Safety	Responsible for emergency response, partnering with the client on any reports of workplace violence.		safety@mлагlobal.com

EMPLOYEE ACTIVE INVOLVEMENT

Contract employees and authorized employee representatives who want to participate in developing and implementing the plan should reach out to Major, Lindsey & Africa by emailing safety@mлагlobal.com.

- Major, Lindsey & Africa will work with and allow contract employees and authorized employee representatives to participate in:
 - Identifying, evaluating, and determining corrective measures to prevent workplace violence
 - Designing and implementing training
 - Reporting workplace violence incidents
- These will be accomplished by:
 - Encouraging contract employees to share any workplace violence related concerns/hazards. Should workplace violence related concerns/hazards be reported, the WVPP Administrator, in partnership with Christa Ford, will meet with the contract employee to understand those hazards and/or concerns and assist with reporting them to the client.
 - At any time, contract employees can report concerns related to any workplace violence related concerns/hazards to Major, Lindsey & Africa by emailing safety@mлагlobal.com.

EMPLOYEE COMPLIANCE

Our system to ensure that contract 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 contract employees in the provisions of Major, Lindsey & Africa's' Contract Employee Workplace Violence Prevention Plan (WVPP)
- Effective procedures to ensure that contract employees comply with the WVPP.
 - This will be accomplished by:
 - Auditing WVPP training logs
 - Aiding clients as needed in investigating suspected incidents of non-compliance
 - Providing retraining to contract employees whose safety performance does not meet the expectations of the WVPP or our clients WVPP.
 - Disciplining contract employees for failure to comply with either WVPP, up to and including termination.

COMMUNICATION WITH EMPLOYEES

We recognize that open, two-way communication between our management team, staff, and other employers about workplace violence issues is essential to a safe and productive workplace. The following communication system is designed to facilitate a continuous flow of workplace violence prevention information between management and staff in a form that is readily understandable by all employees, and consists of one or more of the following:

- New contract employees will receive the Safety Handbook and California Workplace Violence Prevention addendum during onboarding. In addition, the California Workplace Violence Prevention addendum will be distributed annually.
- Workplace violence prevention training; new hires to complete training within 30 days of hire, all employees to complete training annually.
- Contract 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 order should be followed when reporting an incident.
 1. **For incidents where the threat of violence is immediate and serious** – contract 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.
 - Contract employees should then report any incident in accordance with instructions provided by the host client.
 - Lastly, contract employees should reach out to Major, Lindsey & Africa by emailing safety@mlaglobal.com.
 2. **For incidents where there is no immediate threat** (e.g., an interior door lock is broken, lighting needs to be replaced etc.) – contract employees should report incidents in accordance with instructions provided by the host client.

COORDINATION WITH OTHER EMPLOYERS

Major, Lindsey & Africa 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 contract employees will be trained in the general provisions of workplace violence prevention. Our clients will provide training to our contract employees on the client's site-specific provisions of workplace violence prevention.
- Should Major, Lindsey & Africa become aware of any incidents or concerns involving workplace violence at a client worksite, we will engage the host client.

WORKPLACE VIOLENCE INCIDENT REPORTING PROCEDURE

Major, Lindsey & Africa will implement the following effective procedures to ensure that:

- **For incidents where the threat of violence is immediate and serious** – contract 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.
 - Contract employees should then report any incident in accordance with instructions provided by the host client.
 - Lastly, contract employees should reach out to Major, Lindsey & Africa by emailing safety@mlaglobal.com.
- **For incidents where there is no immediate threat** (e.g., an interior door lock is broken, lighting needs to be replaced etc.) – contract employees should report incidents in accordance with instructions provided by the host client.
- Should Major, Lindsey & Africa become aware of any incidents or concerns involving workplace violence at a client worksite, we will engage the host client.
- A strict non-retaliation policy is in place, and any instances of retaliation are dealt with swiftly and decisively. Those found to have engaged in retaliatory conduct may be subject to discipline, including immediate termination.

EMERGENCY RESPONSE PROCEDURES

Contract employees should familiarize themselves with the client's emergency response procedures. This could include:

- Knowing your exact worksite address, floor and any other information that identifies your location at the client worksite.
- Knowing what panic buttons, audible alarms, or visual alarms may be present.
- Familiarizing yourself with any evacuation and/or sheltering plans including maps of evacuation routes and locations of emergency exits.
- Knowing how to obtain help from staff, building security personnel, or law enforcement.

WORKPLACE VIOLENCE HAZARD IDENTIFICATION AND EVALUATION

Contract employees who identify hazards on the host client worksite should report them in accordance with the host client's Workplace Violence Prevention Program. Contract employees who do not receive a response from their client supervisor can escalate their inquiry to Major, Lindsey & Africa by emailing safety@mlaglobal.com.

WORKPLACE VIOLENCE HAZARD CORRECTION

Workplace violence hazards should be evaluated and corrected promptly by the host client. Contract employees who do not receive a response from their client supervisor, or who have concerns over hazard correction on a client worksite, can escalate their inquiry to Major, Lindsey & Africa by emailing safety@mlaglobal.com.

PROCEDURES FOR POST INCIDENT RESPONSE AND INVESTIGATION

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

TRAINING AND INSTRUCTION

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

- When the WVPP is first established.
- Annually

- Whenever a new or previously unrecognized workplace violence hazard has been identified and when changes are made to the plan. The additional training may be limited to addressing the new workplace violence hazard or changes to the plan.

Major, Lindsey & Africa will provide its contract employees with training and instruction on the key definitions found in the WVPP and the requirements listed below:

- Major, Lindsey & Africa's Contract Employee WVPP and the host client WVPP, and how to obtain copies at no cost.
- How to participate in the development and implementation of Major, Lindsey & Africa's WVPP.
- The right to voice concerns to Major, Lindsey & Africa, the host client, or law enforcement without fear of reprisal.
- How to escalate reports of workplace violence incidents or hazards when the host client is unresponsive.
- How to seek assistance to prevent or respond to violence, and strategies to avoid physical harm.
- The violent incident log and how to obtain copies of records pertaining to hazard identification, evaluation and correction, training records, and violent incident logs.
- How to recognize workplace violence warning signs indicated by behavior or comments.
- Strategies to avoid/prevent workplace violence and physical harm, such as being aware of your environment and knowing where the nearest exits/escape routes are.
- How to respond when there is a workplace violence incident.
- How to recognize alerts, alarms, or other warnings about emergency conditions and how to use identified escape routes or locations for sheltering.

EMPLOYEE ACCESS TO THE WRITTEN WVPP

Major, Lindsey & Africa ensures that the Major, Lindsey & Africa Contract Employee WVPP plan shall be in writing and available and easily accessible to contract employees, authorized employee representatives, and representatives of Cal/OSHA. This will be accomplished by posting it to the internet, and having copies available upon request to Major, Lindsey & Africa by emailing safety@mлагlobal.com.

RECORDKEEPING

Major, Lindsey & Africa will:

- Create and maintain training records for a minimum of one (1) year and include the following:
 - Training dates.
 - Contents or a summary of the training sessions.
 - Names and job titles of all people attending the training sessions.
- Maintain violent incident logs for minimum of five (5) years.
- Maintain records of workplace violence incident investigations for at least five (5) years.
 - The records shall not contain medical information per subdivision (j) of section 56.05 of the Civil Code.
- All records of workplace violence hazard identification, evaluation, and correction; training, incident logs and workplace violence incident investigations required by [LC section 6401.9\(f\)](#), shall be made available to Cal/OSHA upon request for examination and copying.

EMPLOYEE ACCESS TO RECORDS

The following records shall be made available to contract 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.

EMPLOYER REPORTING RESPONSIBILITIES

As required by [California Code of Regulations \(CCR\), Title 8, Section 342\(a\). Reporting Work-Connected Fatalities and Serious Injuries](#), Major, Lindsay & Africa 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, Jacqueline Wandrey, Director of Human Resources, 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."

Jacqueline Wandrey

Jacqueline Wandrey, Director of Human Resources
Major, Lindsay & Africa

10/29/2024

Date