



Workplace Violence Prevention Program

Innovative Employee Solutions, Inc.
2307 Fenton Parkway #107-615
San Diego, CA 92108

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 section 6401.9](#).

Date of Last Review: June 2024
Date of Last Revision: 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 which are used to effectively reduce workplace violence hazards.



RESPONSIBILITY

The WVPP administrator, Miranda Svindland, Director, HR, Contingent Workforce US & Global Operations, has the authority and responsibility for implementing the provisions of this plan for Innovative Employee Solutions. If there are multiple people responsible for the plan, their roles will be clearly described.

Responsible Persons	Job Title/Position	WVPP Responsibility(ies)	Phone #	Email
Miranda Svindland	Director, HR, Contingent Workforce	Overall responsibility for the plan; <i>Miranda approves the final plan and any major changes.</i>	858-715-5102	msvindland@innovative-es.com
Tanya Athniel	HR Specialist, Safety and Compliance	Responsible for employee involvement and training; <i>Tanya is responsible for client communications and coordinating training at the client level.</i>	858-715-5100 x114	tathniel@innovative-es.com
Tanya Athniel	HR Specialist, Safety and Compliance	Responsible for investigations of workplace violence. <i>Tanya conducts safety investigations, coordinates emergency response procedures, and communicates with clients and employees about the plan.</i>	858-715-5100 x114	tathniel@innovative-es.com

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

EMPLOYEE ACTIVE INVOLVEMENT

Innovative Employee Solutions ensures the following policies and procedures to obtain the active involvement of employees and authorized employee representatives in developing and implementing the plan:

- IES will require all California employees reporting to a worksite to sign an attestation that they understand the CA WVPP and agree to actively participate in all worksite specific training.
- IES 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 worksite rules fairly and uniformly.

- All employees will follow all worksite specific 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:

- Attestation from employees agreeing to participate in WVPP training at their respective worksites.
- Monthly safety survey to new employees confirming WVPP training at their respective worksites.
- Discipline employees for failure to comply with the WVPP. In consultation with IES clients IES will address any failure to comply with the WVPP at the worksite.

COMMUNICATION WITH EMPLOYEES

We recognize that open, two-way communication between IES, IES clients, IES staff, and our contingent 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 attestation includes workplace violence prevention policies and procedures.
- Workplace violence prevention training programs are the responsibility of IES clients and are specific to the worksite.
- Effective communication between employees and IES, and IES clients about workplace violence prevention and violence concerns.
 - Monthly survey to IES employees about worksite training and issues.
- 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.

- Employees can report directly to IES human resources: humanresources@innovative-es.com
 - Employees may report to their IES Account Manager
 - Employees may report to their worksite supervisor
- 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.

COORDINATION WITH OTHER EMPLOYERS

Innovative Employee Solutions will implement the following effective procedures to coordinate implementation of its plan with IES clients to ensure that IES clients and IES employees understand their respective roles, as provided in the plan.

- All employees will be trained on workplace violence prevention at their worksite.
- Workplace violence incidents involving any employee are reported, investigated, and recorded.
- At a multiemployer worksite, Innovative Employee Solutions will ensure that if its employees experience workplace violence incident that IES clients will record the information in a violent incident log and shall also provide a copy of that log to Innovative Employee Solutions.

WORKPLACE VIOLENCE INCIDENT REPORTING PROCEDURE

Innovative Employee Solutions will implement the following effective procedures to ensure that:

- All threats or acts of workplace violence are reported to an employee's worksite supervisor or manager, who will inform the WVPP administrator at the worksite. Employees may also report directly to IES Human Resources. Employees may call or email IES at any time to report an incident.

It is IES policy that employees will not face retaliation for reporting incidents of worksite violence.



EMERGENCY RESPONSE PROCEDURES

Emergency response is worksite specific and will be determined by IES clients supervising each worksite.

In the event of an emergency, including a Workplace Violence Emergency, contact your worksite supervisor and IES Human Resources.

Responsible Persons	Job Title/Position	WVPP Responsibility(ies)	Phone #	Email
Tanya Athniel	HR Specialist, Safety and Compliance	Responsible for investigations of workplace violence. <i>Tanya conducts safety investigations, coordinates emergency response procedures, and communicates with clients and employees about the plan.</i>	858-715-5100 x114	tathniel@innovative-es.com

WORKPLACE VIOLENCE HAZARD IDENTIFICATION AND EVALUATION

Worksite specific hazard identification and evaluation will be conducted by IES clients.

WORKPLACE VIOLENCE HAZARD CORRECTION

Worksite specific hazards will be evaluated and corrected in a timely manner by IES clients.

PROCEDURES FOR POST INCIDENT RESPONSE AND INVESTIGATION

After a workplace incident, IES will coordinate with IES clients on the implementation of post-incident procedures:

- IES will request information on the scene of an incident.
- 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 ensure corrective actions are taken.
- Obtain any reports completed by law enforcement.
- IES will request a copy of the violent incident log maintained by the client.

IES will 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 training will be conducted at the IES client worksite to ensure that the training is worksite specific.

EMPLOYEE ACCESS TO THE WRITTEN WVPP

Innovative Employee Solutions 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 posting the Plan on the IES website and as follows:

- Whenever an employee or designated representative requests a copy of the written WVPP, we will provide the requester with a printed copy of the WVPP, unless the employee or designated representative agrees to receive an electronic copy.
- We will provide unobstructed access through a company server or website, which allows an employee to review, print, and email the current version of the written WVPP.

RECORDKEEPING

Innovative Employee Solutions will:

- Request and maintain violent incident logs for minimum of five (5) years after an incident investigation.
- 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.

REVIEW AND REVISION OF THE WVPP

The Innovative Employee Solutions WVPP 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 Innovative Employee Solutions' WVPP should include, but is not limited to:
 - Review of incident investigations and the violent incident log.
- 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](#), Innovative Employee Solutions 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, Miranda Svindland, Director, HR, Contingent Workforce of Innovative Employee Solutions, 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.”

Miranda Svindland, Director, HR, Contingent Workforce
US and Global Operations

Miranda Svindland

July 1, 2024