



Workplace Violence Prevention Plan

Veritext's Workplace Violence Prevention Plan (WVPP) is intended to identify, evaluate and correct workplace violence hazards; prevent and mitigate workplace violence incidents; and otherwise address workplace violence matters in accordance with Labor Code section 6401.9.

Date of last review: 7/9/2024

Date of last revision(s): 7/9/2024

DEFINITIONS

"Emergency" means unanticipated circumstances that can be life threatening or pose a risk of significant injuries to employees or other people.

"Engineering controls" means 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" means the violent incident log required by Labor Code section 6401.9.

"Plan" means the workplace violence prevention plan required by Labor Code section 6401.9.

"Threat of violence" means 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" means 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,"** means 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,"** means workplace violence directed at employees by customers, clients, patients, students, inmates or visitors.
 - **"Type 3 violence,"** means workplace violence against an employee by a present or former employee, supervisor, or manager.
 - **"Type 4 violence,"** means 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**” means procedures and rules, which are used to effectively reduce workplace violence hazards.

Workplace Violence Prevention Plan Responsibility

The following individuals have authority and responsibility for implementing the provisions of this plan.

Job Title/Position	Name	WVPP Responsibilities	Phone/ Ext. Number	Email
Chief People Officer	Janel O'Connor	WVPP Administrator	312.508.6057	joconnor@veritext.com
People Partner	Adriana Delaney	Overall responsibility for WVPP in California	213.254.3043	adelaney@veritext.com
Vice President of Operations (CA)	Matthew Spievak	Operations of WVPP California	415.274.9977	mspievak@veritext.com
Director of Learning and Development	Danielle Gsoell	Employee training and participation	949.519.3583	dgsoell@veritext.com
** All managers and supervisors are responsible for implementing and maintaining the WVPP in their work areas and for answering employee questions about WVPP.				

Employee Involvement

Veritext maintains the following policies and procedures to obtain the active involvement of employees in developing and implementing the WVPP:

- Veritext will work with and allow employees to participate in:
 - Identifying, evaluating and determining corrective measures to prevent workplace violence. Veritext will have onboarding, annual training, a page on ADP and The Hub for continuous training and regular communication to discuss identifying, evaluating and correcting workplace violence hazards and concerns. Employees are encouraged to report hazards and concerns and otherwise provide related feedback and suggestions to managers, supervisors and WVPP administrators through various company communication methods, including Red Flag, ADP and The Hub (the reporting form) and in-person communication with managers.
 - Designing and implementing training. Employees are encouraged to participate in designing and implementing training programs through written and oral suggestions and feedback provided to managers, supervisors and WVPP administrators.
 - Reporting and investigating workplace violence incidents. Employees are encouraged to participate in developing efficient and timely methods of reporting and investigating workplace violence incidents through oral and written suggestions and feedback provided to managers, supervisors and WVPP administrators.
- Veritext 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 Access to the Written WVPP

Veritext ensures that the WVPP plan shall be in writing, and shall be available and easily accessible to employees, authorized employee representatives and representatives of the California Division of Occupational Safety and Health (Cal/OSHA) at all times. This will be accomplished by:

- Whenever an employee or designated representative requests a copy of the written WVPP, Veritext will provide the requester with a printed copy of the WVPP, unless the employee or designated representative agrees to receive an electronic copy.
- Veritext provides unobstructed access through ADP and The Hub, which allows an employee to review, print and email the current version of the written WVPP.

Coordination With Other Employers

Veritext maintains the following practices and methods to coordinate implementation of its WVPP with other employers to ensure that those employers and employees understand their respective roles, as provided in the plan.

- All employees are provided training on workplace violence prevention.
- Workplace violence incidents involving any employee are reported, investigated and recorded. If the incident is at a multiemployer worksite, Veritext provides a copy of that log to the controlling employee.

Workplace Violence Incident Reporting Procedure

Veritext will implement the following procedures to ensure that it can effectively accept and respond to reports of workplace violence:

- All threats or acts of workplace violence must be reported to an employee's supervisor or manager, who will inform the WVPP administrators.
- Employees may also report incidents directly to the following individuals:

Job Title/Position	Name	WVPP Responsibilities	Phone/ Ext. Number	Email
Chief People Officer	Janel O'Connor	WVPP Administrator	312.508.6057	joconnor@veritext.com
People Partner	Adriana Delaney	Overall responsibility for WVPP in California	213.254.3043	adelaney@veritext.com
Vice President of Operations (CA)	Matthew Spievak	Operations of WVPP California	415.274.9977	mspievak@veritext.com
Director of Learning and Development	Danielle Gsoell	Employee training and participation	949.519.3583	dgsoell@veritext.com
** All managers and supervisors are responsible for implementing and maintaining the WVPP in their work areas and for answering employee questions about WVPP.				

- Employees may report violence incidents anonymously through Red Flag reporting.
 - Reporting forms are available through ADP and The Hub.



Veritext will neither retaliate against anyone for reporting a workplace violence incident, nor tolerate or permit retaliation by management, employees or coworkers for reporting a workplace violence incident. An employee who retaliates against a coworker for reporting an incident is subject to discipline, up to and including termination.

Employee Compliance

Veritext maintains the following effective procedures to ensure that all employees, both supervisory and nonsupervisory, comply with the WVPP:

- Training employees, supervisors and managers on all WVPP provisions upon its initial establishment and upon hire, and through annual WVPP training sessions. Additionally, Veritext provides periodic training whenever a new or previously unrecognized workplace violence hazard has been identified and when changes are made to the plan.
- Retraining employees whose safety performance is deficient or inconsistent with the WVPP.
- Recognizing employees who demonstrate safe work practices consistent with the WVPP in the workplace by recognizing their safe practices during Operation Excellence Awards, Regional Meetings and written recognition on an annualized basis outlining all key representatives.
- Employees whose safety performance is deficient or inconsistent with the WVPP will require WVPP retraining.
- Employees who disregard or fail to comply with the WVPP are subject to disciplinary action, up to and including termination.

Communication with Employees

Veritext recognizes that open communication between our management team, employees and other employers about workplace violence incidents, hazards and concerns is critical to a safe and productive workplace. Our communication system is designed to facilitate effective and efficient communication of information in a form that is readily understandable by all employees. To that end, we maintain the following communication procedures regarding workplace violence matters:

- New employee orientation that includes workplace violence prevention policies and procedures.
 - Workplace violence prevention training programs upon implementation of the WVPP, for new hires and annually thereafter, with additional periodic training whenever a new or previously unrecognized workplace violence hazard has been identified and when changes are made to the plan.
 - Procedures for employees to report a violent incident, threat or other workplace violence concern to their employer or law enforcement without fear of reprisal or adverse action, which include:
 - In the event of an emergency, employees should call 911 or law enforcement and contact your local building security posted in the common employee kitchen area.
 - Employees can report a violent incident, threat or other workplace violence concern to:
 - The Workplace Violence Contact Information form posted at the employee kitchen areas. Employees should reference this form to contact the WVPP administrators and your local security service.
 - In-person communication with your supervisor or a manager.
 - Submitting the information through reporting forms in ADP and The Hub.
 - Report violence incidence anonymously through Red Flag reporting.
- Employees' reports of violent incidents, threats or workplace violence concerns will be investigated in a timely manner, and employees will be informed of the investigation results and any corrective actions to be taken.



- Veritext will timely investigate such reports by gathering information from employees and other individuals as needed, depending on the reported incident, threat or concern, including by in-person conversations; written reports and witness statements; and consultations and conversations with law enforcement, security or other third parties as needed.
- Veritext will provide updates on the status of investigations and corrective actions to employees through email and/or meetings. Depending on the nature of the investigation, these updates could include information about the progress of investigations, the results of investigations and any corrective actions taken.
- Veritext will provide updates during quarterly meetings with other employers in the building (at or near and around the same worksite), if any, to discuss the workplace violence concerns and the WVPP. These meetings could involve sharing updates on the plan, discussing recent incidents and coordinating training sessions.
- Sharing training materials and incident reports with other employers to ensure a coordinated response to any incidents.
- Holding regularly scheduled meetings that address security issues and potential workplace violence hazards.
- Posting or distributing workplace violence prevention information displayed in the workplace kitchen area and accessible on ADP and The Hub.
- Ensuring that supervisors and employees can communicate effectively.
- In the event of a workplace violence incident, employees may access their personal mobile device or other communications device for seeking emergency assistance, assessing the safety of the situation, or communicating with a person to verify their safety.

Emergency Response Procedures

- Veritext has in place the following specific measures to handle actual or potential workplace violence incidents and emergencies:
- Effective means to alert employees of the presence, location and nature of workplace violence emergencies by the following:
 - Alarms (in process)
 - Phone, text, and other electronic alerts will be sent to employees.
 - Verbal communication will be used when effective.
- Veritext maintains the following evacuation or sheltering plans.
- Each office has a customized evacuation and sheltering in place.
- The plans include maps of evacuation routes, locations of emergency exit and instructions for sheltering in place.
- Employees can obtain help from staff, security personnel or law enforcement through the following means:
 - In the event of an emergency, including a workplace violence emergency, call for emergency assistance by dialing 911 or the local law enforcement number posted on your local plan in the employee kitchen area.
 - Then, when it is safe to do so, notify the WVPP Administrators.



Job Title/Position	Name	WVPP Responsibilities	Phone/ Ext. Number	Email
Chief People Officer	Janel O'Connor	WVPP Administrator	312.508.6057	joconnor@veritext.com
People Partner	Adriana Delaney	Overall responsibility for WVPP in California	213.254.3043	adelaney@veritext.com
Vice President of Operations (CA)	Matthew Spievak	Operations of WVPP California	415.274.9977	mspievak@veritext.com
Director of Learning and Development	Danielle Gsoell	Employee training and participation	949.519.3583	dgsoell@veritext.com
** All managers and supervisors are responsible for implementing and maintaining the WVPP in their work areas and for answering employee questions about WVPP.				

- Contact information for response staff and local law enforcement is posted with the *Workplace Violence Contact Information* form, which can be found in the employee kitchen common areas:

Training and Instruction

All employees, both supervisory and nonsupervisory, will have training and instruction on general and job-specific workplace violence practices. This training will include interactive videos, discussions, practical exercises and distribution of written materials. Training and instruction will include the following:

- When the WVPP was first established.
- Training as part of the onboarding process for all new employees.
- Annually to ensure all employees understand and comply with the plan.
- Periodically training when 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 a workplace violence hazard or changes to the plan.

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

- This WVPP, how to obtain a copy of the WVPP at no cost, and how to participate in the WVPP's development and implementation.
- 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 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.
- Veritext will follow training with interactive questions and answers with a person knowledgeable about the WVPP.
- The training will include the following:
 - Strategies to avoid/prevent workplace violence and physical harm, such as:
 - How to recognize workplace violence hazards including the risk factors associated with the four types of workplace violence.
 - Ways to defuse hostile or threatening situations, including workplace bullying, which can escalate to harassment and/or workplace violence.



- Emergency medical care is available in the event of any violent act upon an individual in the workplace.
- Post-event trauma counseling available to employees.

Workplace Violence Hazard Identification and Evaluation

The following policies and procedures are established and required to be conducted by Veritext 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 Veritext is made aware of a new or previously unrecognized hazard.
- Veritext will review all submitted/reported concerns of potential hazards from:
 - All submitted and reported concerns.
 - Workplace Violence Hazards reported through all communications, including emails, submitted forms or Red Flag.

Periodic Inspections

Periodic inspections of workplace violence hazards will identify unsafe conditions and work practices. Periodic inspections will be conducted after each workplace violence incident, and whenever Veritext is made aware of a new or previously unrecognized hazard.

If you feel an extra inspection to identify and evaluate workplace violence need to be performed, please contact the following designated individuals:

Job Title/Position	Name	WVPP Responsibilities	Phone/ Ext. Number	Email
Chief People Officer	Janel O'Connor	WVPP Administrator	312.508.6057	joconnor@veritext.com
People Partner	Adriana Delaney	Overall responsibility for WVPP in California	213.254.3043	adelaney@veritext.com
Vice President of Operations (CA)	Matthew Spievak	Operations of WVPP California	415.274.9977	mspievak@veritext.com
Director of Learning and Development	Danielle Gsoell	Employee training and participation	949.519.3583	dgsoell@veritext.com
** All managers and supervisors are responsible for implementing and maintaining the WVPP in their work areas and for answering employee questions about WVPP.				

Inspections for workplace violence hazards include assessing:

- The exterior and interior of the workplace for potential hazards or other criminal acts.
- Interaction with clients or other members of the public and any potential risk factors based on those interactions.
- The number of workers on the site and risk factors for these employees working alone.
- Employee's schedules and the risk factors associated with those schedules.
- The need for or effectiveness of existing security.
- The need for or effectiveness of existing alarm systems, including "panic button" systems.



- Adequate illumination of all work areas, including hallways, entranceways and parking areas.
- The training for procedures for employee response during any criminal act, including our policy prohibiting employees confronting violent persons or persons committing a criminal act.
- Procedures for reporting suspicious or unusual activities or persons.
- Posting of emergency contact information for law enforcement, security and emergency services.
- Employees have access to a telephone with an outside line.
- Employees have effective escape routes from the workplace.
- Employees have a designated safe areas where they can go in an emergency.
- Frequency and severity of threatening or hostile situations that may lead to workplace violence incidents by persons who are customers, visitors or service recipients of Veritext.
- Employees' skill and knowledge in safely handling threatening or hostile customers, service recipients or other members of the public.
- Effectiveness of systems and procedures that warn others of actual or potential workplace violence danger or that summon assistance (panic buttons) or other worksite alert systems.
- The use of work practices such as the "buddy" system for specified emergency events.
- How well our establishment's management and employees communicate with each other.
- Other procedures to identify and evaluate workplace violence hazards.

When a hazard has been identified, Veritext will analyze the hazard in coordination with appropriate persons, such as employees, management personnel, security services and/or law enforcement personnel, in order to identify timely methods to correct the hazard.

Workplace Violence Hazard Correction

Workplace violence hazards will be evaluated and corrected in a timely manner. After such hazards are identified, either through periodic inspection, review and evaluation of submitted reports and concerns, or other means, Veritext has implement the following effective procedures to correct these workplace violence hazards:

- The WVPP administrators will immediately begin taking appropriate steps to evaluate and address the hazard to ensure they are corrected in a timely manner. Depending on the hazard, this may generally include:
 - Communicating corrective measures to employees.
 - Making improvements to the system in place.
 - Training or retraining employees on workplace violence procedures.
- If an imminent workplace violence hazard exists that cannot be immediately abated without endangering employees, all exposed employees will be removed from the situation.
- All corrective actions taken will be documented and dated on the Violence Incident Log, which can be accessed by employees in ADP and The Hub.
- Veritext will take corrective measures for workplace violence hazards that may include the following specific measures:
 - Minimizing Veritext's attractiveness for potentially hazardous activity or criminal acts by:
 - Maintaining, replacing, repairing or improving lighting around and at the workplace, including exterior lighting around parking areas and building entrances.
 - Maintaining systems, such as key cards, codes, door locks.
 - Modifying schedules and security measures to correct hazards associated with employees working alone or in small groups, and/or employees working late night/early morning hours.
 - Maintaining communication systems to ensure employees can report workplace violence incidents and contact emergency services.
 - Posting the most recent contact information for WVPP administrators, law enforcement, fire and medical services in kitchen areas.
 - Control, access within the workplace by non-employees, including customers, clients, visitors, deliveries, recently discharged employees and persons with whom one of our employees is having a dispute.
 - Maintaining, repairing or installing effective systems to warn others of violence or danger.



- Ensuring adequate employee escape routes and modifying existing routes as needed for effectiveness.

Procedures for Post Incident Response and Investigation

After a workplace incident, the WVPP administrator or their designee 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 and obtain written statements via Veritext's *Workplace Violence Incident Reporting* form which can be found in ADP or The Hub.
- Review security footage and access logs of existing security systems, if any.
- Examine the workplace for security risk factors associated with the incident, including any previous reports of inappropriate behavior by the perpetrator.
- Determine the likely cause of the incident.
- Take corrective action consistent with this WVPP to correct this workplace violence hazard and prevent similar incidents from occurring.
- Document the findings and ensure corrective actions have been carried out.
- Obtain any reports completed by law enforcement.
- Use the *Workplace Violence Incident Log* form for every workplace violence incident and include the following information:
 - The date, time and location of the incident.
 - Workplace violence type(s) involved in the incident.
 - A detailed description of the incident.
 - A 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.
 - A classification of circumstances 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.
 - A classification of where the incident occurred, such as in the workplace, parking lot or other area outside the workplace, or other area.
 - The type of incident, including, but not limited to, whether it involved any of the following:
 - 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.
 - 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.
 - Information about the person completing the log, including their name, job title and the date completed.
- Review all previous incidents.
- Begin WVPP review consistent with this plan's "WVPP Review and Revision" provisions.



- Veritext will offer support and resources to affected employees through our employee benefits and the employee assistance program.

Veritext will ensure that no personal identifying information is recorded or documented in the written investigation report. This includes information that would reveal identification of any person involved in a violent incident, such as the person's name, address, email address, telephone number, Social Security number or other information that, alone or in combination with other publicly available information, reveals the person's identity.

WVPP Review and Revision

Veritext 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 this WVPP's "Employee Involvement" section, as well as the following procedures to obtain the active involvement of employees and authorized employee representatives, in reviewing the plan's effectiveness:

- Reviewing workplace violence investigations, findings and violent incident log.
- Assessing the effectiveness of security systems.
- Review that violence risks are being properly identified, evaluated, and corrected, and that 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.

Recordkeeping

Veritext 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 people conducting the training.
 - 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 a minimum of five (5) years.
 - The records shall not contain medical information per subdivision (j) of section 56.05 of the Civil Code.
- Make available to Cal/OSHA upon request for examination and copying records of workplace violence hazard identification, evaluation and correction; and training, incident logs and workplace violence incident investigations required by Labor Code section 6401.9(f).



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.



Dear Employees,

As part of our ongoing commitment to your safety and well-being, I want to remind you of our responsibilities under the California Code of Regulations (CCR), Title 8, Section 342(a) – Reporting Work-Connected Fatalities and Serious Injuries. Veritext will immediately report any serious injury or illness (as defined by CCR, Title 8, Section 330(h) or death (including those due to workplace violence) of an employee that occurs in the workplace or in connection with employment to Cal/OSHA.

Furthermore, I am pleased to announce that Veritext Legal Solutions is establishing, implementing, and maintaining a comprehensive Workplace Violence Prevention Plan. This plan, along with the associated documents and forms, reflects our dedication to creating a safe and supportive work environment for all employees.

Veritext is fully committed to ensuring your safety, and this plan is a significant step towards achieving this goal.

Sincerely,

Janel O'Connor, SPHR, SHRM-SCP (she/her)
Chief People Officer