Workplace Violence Prevention Program Cazenovia Central School District May 2024

Annual Program Review – Update & Sign Annually

Program review

Once a year Cazenovia Central School District, with the participation of an authorized employee representative, will review the workplace violence prevention program. The sign off sheet below indicates who conducted the review and the date it occurred.

Name and Title of Management and authorized employee representative (where applicable)	Signature	Date
Thomas Finnerty, Assistant Superintendent/Business Official		
Eric Benedict, Director of Facilities/Safety Officer		
Molly Hagan, HS Principal, CASA Union Representative		
Michael Hodinger, Custodian, CSSU Union President		
Marty Kelly, Teacher, CUE Union President		

Access to this program:

To obtain a copy of this plan please contact:

Name: Thomas Finnerty

Title: Assistant Superintendent/Business Official

Department: Business Office Phone: (315) 655-1340

Location: District Offices 31 Emory Avenue, Cazenovia, NY 13035

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Introduction

What is Workplace Violence?

Workplace violence is defined as any physical assault or act of aggressive behavior that occurs where a public employee performs any work-related duty in the course of their employment. This includes but is not limited to:

- 1) An attempt or threat, whether verbal or physical, to inflict physical injury upon an employee.
- 2) Any intentional display of force which would give an employee reason to fear or expect bodily harm.
- 3) Intentional and wrongful physical contact with a person without his or her consent that entails some injury.
- 4) Stalking an employee to cause fear of harm to the employee's physical safety and health when such stalking has arisen through and in the course of employment.

What is the New York State Workplace Violence Prevention Law and Regulation? On June 7, 2006, New York State enacted legislation creating a new Section 27-b of State Labor Law that requires every public employer to evaluate the risk of workplace assaults and homicides at its workplace(s) and to develop and implement programs to prevent and minimize the hazard of workplace violence to public employees. In 2009, NYS Department of Labor (DOL) implemented regulations to accompany the Workplace Violence Prevention Law. These regulations are enforced by NYSDOL and can be found¹ at: https://dol.ny.gov/system/files/documents/2021/03/workplace-violence-prevention-regulations.pdf. Effective January 4, 2024, all public school districts, New York City public schools, Boards of Cooperative Education Services (BOCES) and County Vocational Education & extension Boards are covered by this law.

Purpose of this program

The purpose of this Workplace Violence Prevention Program is to provide information to managers, supervisors, employees, and authorized employee representatives about preventing and responding to incidents of workplace violence or threats of violence in accordance with the Workplace Violence Prevention Law and Regulation.

The goal of this program is to reduce the risk of workplace violence to employees and to ensure that any incident, complaint, or report of violence is taken seriously and dealt with appropriately and as expeditiously as possible. This program outlines the major components of our effort to meet these goals. At the core of this Workplace Violence Prevention Program is the *Cazenovia Central School District's* commitment to work with its employees to maintain a work environment free from violence and other threatening behavior to the greatest degree possible.

Policy Statement

The Cazenovia Central School District has developed and implemented a policy statement which describes the goals and objectives of our workplace violence prevention policy, the incident alert and notification policies employees should follow in the event of workplace

¹ Regulations can also be found in Title 12 of the New York Codes, Rules, and Regulations, Section 800.6

violence, and describes how employees are able to participate in the implementation of our workplace violence prevention program through an authorized employee representative. The policy statement is posted *in the District Office*. The policy statement is included in **Attachment 1** and is available on the District's Board Docs website.

Workplace Risk Evaluation

The *Cazenovia Central School District* has conducted a workplace risk evaluation consisting of:

A record examination: Cazenovia Central School District will examine all records of workplace violence incidents in the past year to identify patterns in the type and cause of incidents; areas of the workplace where incidents occur; incidents that involve specific workplace operations; or incidents which involve specific individuals.

An assessment of administrative risk factors: Cazenovia Central School District will assess all relevant policies, practices, and procedures that may impact the risk of workplace violence.

An evaluation of the physical environment: Cazenovia Central School District will evaluate the physical work environment for factors which may place employees at risk of workplace violence with the participation of authorized employee representatives. Although workplace violence can occur in any work setting, some settings or factors may pose a greater degree of risk. Employment situations or factors that may pose a higher risk for Cazenovia Central School District employees include, but are not limited to, the following:

- Working in public settings
- Working late night or early morning hours
- Exchanging money with the public
- · Working alone or in small numbers
- Working in a setting with uncontrolled access to the workplace
- Working in a setting where previous security problems have occurred:
- Having a mobile workplace assignment
- Working with a population which might expose one to potentially violent persons (e.g. in health care, social service, public service or criminal justice settings)
- Having duties that include the delivery of passengers, goods, or services

Risk factors identified during the examination, assessment and evaluation are listed in **Attachment 2**, along with the methods and means by which each risk is being addressed by **Cazenovia Central School District**. As your employer, the **Cazenovia Central School District** is responsible for addressing all risk factors that our employees are potentially exposed to.

Any incidents that may occur after the implementation of this program must be carefully documented and analyzed in order to make improvements to this program during the required annual review or as necessary.

Workplace Violence Control Measures and Prevention

Hierarchy of Controls

A hierarchy of controls is a safety professional term referring to a ranking of the safeguards that an employer can use to protect employees from harm in order of preference and effectiveness. There are three main types of safeguards, or control measures, that an employer can implement to protect employees from recognized workplace violence risk factors. Engineering controls are considered the most effective, followed by work practice controls, and then personal protective equipment.

Engineering controls eliminate or reduce the risk of workplace violence through physical changes to the workplace.

Examples of engineering controls include:

- Increasing lighting in remote areas
- Designing secure building access
- Installing security hardware
- · Eliminating isolated work areas
- Installing drop safes

Work practice controls eliminate or reduce the risk of workplace violence through changes to organizational policies, procedures, and work practices.

Examples of work practice controls include:

- Increased staffing
- Employment of security personnel
- Implementing building access control procedures, for example, requiring badges to enter
- Instituting communication procedures across shifts or classes to share information regarding agitated clients or students
- Providing information to employees on the criminal history or violence of clients, inmates, or customers
- Reducing customer wait times
- Providing employees with personal alarms
- Providing cell phones to employees in the field
- Training employees on de-escalation and how to recognize precursors to violence

Personal Protective Equipment (PPE) is generally considered the least effective control measure but may be needed to enhance other control measure or minimize potential injury severity when other control measures fail.

Examples of personal protective equipment include:

- Ballistic or stab resistant body armor
- Bite Resistant Arm Guards and Clothing
- Eye and face protection

Workplace Violence Prevention

Prevention of violence in the workplace is the responsibility of *Cazenovia Central School District* and everyone has a role to play in keeping the workplace safe from violence. The following section focuses on early warning signs of violent behavior and workplace issues that have the potential to trigger violent behavior. Management, employees, and authorized representatives should be familiar with the signs and issues described below to intervene early and reduce the likelihood of workplace violence.

Early warning signs of potential violence

There is no single "profile" that can identify a potentially dangerous individual. It is important to be careful when drawing assumptions about a person's potential for violence based on any specific behavior or action. However, certain patterns of behavior and events frequently precede episodes of violence.

Behavior or situations that may indicate an increased risk of violence include, but are not limited to the following:

- Direct or veiled threats of harm.
- Intimidation, belligerence, bullying or other inappropriate behavior directed at others
- Numerous conflicts with supervisors and employees and/or verbal comments expressing hostility directed at coworkers, supervisors, or others
- Bringing an unauthorized weapon to work, brandishing a weapon in the workplace, making inappropriate reference to guns or expressing fascination with weapons
- Fascination with incidents of workplace violence, statements in person or online indicating approval of the use of violence to resolve a problem, or statements indicating identification with perpetrators of workplace homicides
- Statements in person or online indicating an increased tone of desperation, feeling that normal interventions to solve a problem will not work, feeling hopeless about a situation at work, with family, with finances, and other personal problems
- Signs of abuse of drugs or alcohol on or off the job
- Extreme or uncharacteristic changes in behavior or displays of emotion
- Employees with ongoing domestic difficulties
- Employees with a temporary order of protection against someone

These behaviors or situations should be reported to an employee's supervisor and/or the administrator of the workplace violence prevention program. Some behaviors may require immediate law enforcement intervention where others may require disciplinary action or indicate a need for an Employee Assistance Program (EAP) referral.

Workplace issues that may trigger violence

Common situations that may trigger workplace violence can be categorized under employee issues or workplace issues.

Employee issues include:

- A negative performance review
- An unwelcome change in role due to performance or reorganization in the workplace
- An unwelcome change in work schedule
- Criticism of an employee's performance
- A conflict with coworker or supervisor
- Personal stress outside the workplace
- Increased workload or pressure

Workplace issues include:

- No clearly defined rules of conduct
- A lack of employee training
- Inadequate hiring practices or screening of potential employees
- Insufficient supervision of employees
- A lack of discipline or inconsistent discipline in the workplace
- A lack of employee support systems or support systems that are inadequate
- Employer failure to address incidents as they occur
- An overly authoritarian management style in the workplace

Note, a workplace issue that only an employee perceives can still be a trigger for workplace violence.

Recognizing the signs and intervening early

To help prevent a violent situation from occurring management, employees, and authorized representatives should be trained to recognize the early warning signs (such as a change in a person's behavior before an episode of violence) and the issues or events that may trigger violence. With this knowledge an employer can intervene early to prevent a violent incident from occurring.

Reporting an incident

At the core of this Workplace Violence Prevention Program is *Cazenovia Central School District's* commitment to work with its employees to maintain a work environment free from violence and violent behavior to the greatest degree possible.

Any Cazenovia Central School District employee who becomes aware of a physical assault, threatening behavior, or verbal abuse at the workplace must immediately report the facts and circumstances of the violent incident to their supervisor and/or the contact person identified in the Policy Statement (Attachment 1). In the event that an employee witnesses or is involved in an incident of violence in which there is an immediate threat to the employee's safety or the safety of others or where a serious injury has occurred, the employee will immediately call 911 to obtain law enforcement and/or medical assistance and notify their immediate supervisor. The supervisor will immediately conduct a preliminary inquiry into the facts and circumstances of the incident and make a prompt report to the Assistant Superintendent/Business Official using the Incident Report in Attachment 4.

If a pattern of workplace violence incidents develops that involve criminal conduct or serious injury, *Cazenovia Central School District* will attempt to develop a protocol with the District Attorney or Police to ensure that violent crimes committed against employees in the workplace are promptly investigated and appropriately prosecuted.

Retaliation against an employee who makes a report of violence or other violent behavior is strictly prohibited and shall be subject to appropriate corrective or disciplinary measures.

Post-Incident Response

Management has developed procedures to respond to incidents of workplace violence. These include the following as appropriate:

- Assure that injured employees receive prompt and appropriate medical care. (This
 includes, but is not limited to, providing transportation of any injured persons to medical
 care. Prompt first aid and emergency medical treatment can minimize the harmful
 consequences of a violent incident.)
- Report the incident to the appropriate authorities as required by applicable laws and regulations.
- Secure the premises to safeguard evidence and reduce distractions during the post incident response process.
- Assure that an incident report is completed immediately after an incident occurs, noting details that might be forgotten over time. Attachment 4 contains the incident report form.
- Address the need for appropriate treatment for employees who were victims of workplace violence. In addition to physical injuries, victims and witnesses may suffer psychological trauma, fear of returning to work, feelings of incompetence, guilt, powerlessness, and fear of criticism by supervisors or managers.
- Management will investigate any reported workplace violence incident thoroughly.

All employees should be trained to inform management about any incidents that occur and how prepare an incident report.

Employee Information and Training

Training of every employee will be performed upon initial assignment and annually thereafter. Retraining is required any time there is a significant change to *Cazenovia Central School District's* workplace violence prevention program, a newly identified risk factor, or a control measure addition. Required training topics are listed in the Training Outline in **Attachment 3**.

Recordkeeping Requirements

All workplace violence incidents and threats will be documented in a workplace violence incident report. Workplace violence incidents that cause a work-related death or an injury that-meets the recording criteria of the Public Employee Safety and Health Bureau (PESH) log of injuries and illnesses should be recorded on both the PESH log and the workplace violence incidents report. For more on the PESH log of injuries and illness, the PESH website linked here: https://dol.ny.gov/public-employee-safety-health

Workplace violence incident reports will provide a written description when an incident occurs so that management can evaluate why the incident occurred and implement an appropriate safeguard or control measure to reduce the risk of such incidents from happening again. The Workplace Violence Incidents Report also creates a historical record. The Workplace Violence Incident Report(s) will be reviewed at least once a year to determine if and how the workplace violence prevention program should be updated. The incident reporting form is attached as **Attachment 4** of this document.

Program Review

The Assistant Superintendent/Business Official, with the Authorized Employee Representatives, will evaluate the effectiveness of this Workplace Violence Prevention Program, at least annually or after any serious workplace violence incident. The review will focus on: determining trends in workplace violence incidents; addressing the root cause of incidents; evaluating the effectiveness of the control measures in place; and determining if any changes need to be made to control measures. The review will also assess whether the reporting and record keeping systems have been effective in collecting all relevant information. The cover sheet of this program will be updated with the names and titles of those who perform the review and the date of completion.

If an employee or authorized representative submits a written notice of concern regarding a violation of the employer's workplace violence prevention program or imminent danger in the workplace, the employer must be a afforded a reasonable opportunity to address the reported issue. If the employee or authorized employee representative believes that the reported concern has not been resolved and a serious violation of the *Cazenovia Central School District* workplace violence prevention program still exists, the employee or authorized employee representative may request an inspection by filing a complaint with the Public Employee Safety and Health (PESH) bureau at the Department of Labor's Division of Safety and Health using the complaint form linked here:

https://dol.ny.gov/system/files/documents/2023/09/pesh7.pdf or by calling 1-844-SAFE-NYS. The completed and signed complaint form can be emailed to ask.shnypesh@labor.ny.gov, or faxed or mailed to the nearest Division of Safety and Health (DOSH) District Office listed in the complaint form.

Employees can also contact the PESH bureau to ask questions about health and safety standards by calling: 1-844-SAFE-NYS or emailing <u>ask.shnypeshlabor.ny.gov</u>. An employee is NOT required to provide written notice to an employer if the employee believes themselves, another employee, or patient is in imminent danger of workplace violence and reasonably believes, in good faith, that reporting to a supervisor would not result in corrective action. In such an instance, an employee can reach out directly to PESH.

For additional information on recordkeeping or workplace violence prevention, or to request free and confidential consultation assistance, please use the contact information on the PESH Consultation Fact Sheet available here:

https://dol.ny.gov/system/files/documents/2023/11/p206_12-10-20.pdf

ATTACHMENT 1

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Personnel

SUBJECT: WORKPLACE VIOLENCE PREVENTION POLICY STATEMENT

Overview

The District is committed to the safety and security of its employees. Workplace violence presents a serious occupational safety hazard. The goal of this policy is to promote the safety and well-being of all people in the workplace.

Acts of violence against any employee where any work-related duty is performed will be thoroughly investigated and appropriate action will be taken, including involving law enforcement authorities when warranted. All employees are responsible for: helping to create an environment of mutual respect for each other, as well as students, parents, and other visitors; following all applicable documents; and for assisting in maintaining a safe and secure work environment.

This policy was developed in consultation with the authorized employee representative(s) and is designed to meet the requirements of New York State Labor Law.

Definitions

For purposes of this policy, the following definitions apply:

- a) "Authorized employee representative" means an employee authorized by the employees or the designated representative of an employee organization recognized or certified to represent the employees pursuant to Article 14 of the Civil Service Law, the Public Employees' Fair Employment Act.
- b) "Imminent danger" means any conditions or practices in any place of employment which are such that a danger exists which could reasonably be expected to cause death or serious physical harm immediately or before the imminence of the danger can be eliminated through the enforcement procedures.
- c) "Retaliatory action" means the discharge, suspension, demotion, penalization, or discrimination against any employee, or other adverse employment action taken against an employee in the terms and conditions of employment.
- d) "Serious physical harm" means physical injury which creates a substantial risk of death, or which causes death or serious and protracted disfigurement, protracted impairment of health, or protracted loss or impairment of the function of any bodily organ or a sexual offense as defined in Penal Law.
- e) "Serious violation" means a serious violation of the public employer workplace violence prevention program is the failure to:
 - 1. Develop and implement a program;

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SUBJECT: WORKPLACE VIOLENCE PREVENTION POLICY STATEMENT (Cont'd.)

- 2. Address situations which could result in serious physical harm.
- f) "Supervisor" means any person within the District who has the authority to direct and control the work performance of an employee or who has the authority to take corrective action regarding the violation of a law, rule, or regulation to which an employee submits written notice.
- g) "Workplace" means any location away from an employee's domicile, permanent or temporary, where an employee performs any work-related duty in the course of their employment by the District.

What is Workplace Violence

Workplace violence is any physical assault or acts of aggressive behavior occurring where an employee performs any work-related duty in the course of their employment including, but not limited to:

- a) An attempt or threat, whether verbal or physical, to inflict physical injury upon an employee;
- b) Any intentional display of force which would give an employee reason to fear or expect bodily harm;
- c) Intentional and wrongful physical contact with an employee without their consent that entails some injury;
- d) Stalking an employee with the intent of causing fear of material harm to the physical safety and health of the employee when the stalking has arisen through and in the course of employment.

Workplace violence may be committed by:

- a) Other employees;
- b) Former employees;
- c) Students;
- d) Parents;
- e) Visitors;
- f) Individuals who have no connection to the workplace, but enter to commit a robbery or other crime; or

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SUBJECT: WORKPLACE VIOLENCE PREVENTION POLICY STATEMENT (Cont'd.)

g) An individual who has a personal relationship with an employee.

Prohibited Conduct

The District prohibits workplace violence and will not tolerate violence, threats of violence, or intimidating conduct in the workplace.

Workplace Violence Prevention Advisory Committee

The District will establish a Workplace Violence Prevention Advisory Committee that will meet periodically throughout the year. The purpose of the Workplace Violence Prevention Advisory Committee is to assist the District in coordinating its efforts to comply with its responsibilities related to workplace violence prevention, including overseeing the development and maintenance of the District's Workplace Violence Prevention Program (WVPP).

The Workplace Violence Prevention Advisory Committee will include:

- a) The Workplace Violence Prevention Coordinator;
- b) All authorized employee representatives;
- c) The Chief Emergency Officer.

It may also include one or more representatives from the following groups:

- a) District-wide school safety team;
- b) The building level emergency response team(s);
- c) District/building administrators;
- d) Teachers, including at least one special education teacher; and
- e) Other District staff.

Workplace Violence Prevention Coordinator

The District has designated the following District employee to serve as its Workplace Violence Prevention Coordinator:

Thomas Finnerty, Assistant Superintendent, Business Office, (315) 655-1340,

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SUBJECT: WORKPLACE VIOLENCE PREVENTION POLICY STATEMENT (Cont'd.)

The Workplace Violence Prevention Coordinator convenes and coordinates the activities and plans of the Workplace Violence Prevention Advisory Committee. The Workplace Violence Prevention Coordinator is also responsible for answering employee questions about this policy and related materials, as well as receiving workplace violence incident reports.

<u>Authorized Employee Representatives</u>

Authorized employee representatives will participate on the Workplace Violence Prevention Advisory Committee. Other responsibilities of the authorized employee representatives include, but are not limited to:

- a) Participating in the development and implementation of this policy.
- b) Evaluating the physical environment.
- c) Developing the WVPP.
- d) Reviewing workplace violence incident reports at least annually to identify trends in the types of incidents reported, if any.
- e) Reviewing the effectiveness of the mitigating actions taken.
- f) Reporting violations of the District's WVPP.

Reporting Workplace Violence

The District has established and implemented a reporting system for incidents of workplace violence. If there is a developing pattern of workplace violence incidents which may involve criminal conduct or a serious injury, the District will attempt to develop a protocol with the District Attorney or police to ensure that violent crimes committed against employees in the workplace are promptly investigated and appropriately prosecuted. The District will provide information on these protocols and contact information to employees who wish to file a criminal complaint after a workplace violence incident.

All employees and authorized employee representatives are responsible for providing written notice to a supervisor or Workplace Violence Prevention Coordinator of any violent incidents, threatening behavior, including threats they have witnessed, received, or have been told that another person has witnessed or received. Reports of workplace violence must be made in writing. All reports must be immediately forwarded to the Workplace Violence Prevention Coordinator.

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SUBJECT: WORKPLACE VIOLENCE PREVENTION POLICY STATEMENT (Cont'd.)

Written notice is not required where imminent danger exists to the safety of a specific employee and the employee reasonably believes in good faith that reporting to a supervisor or the Workplace Violence Prevention Coordinator would not result in corrective action.

After the District receives notice, the District will be afforded a reasonable opportunity to correct the activity, policy, or practice. The District will immediately respond to all reported incidents of violence or threatening behavior upon notification.

In addition to complying with the reporting requirements in this policy, District employees must comply with all other applicable reporting requirements contained in any District policy, regulation, procedure, collective bargaining agreement, or other document such as the District's *Code of Conduct*.

Inspections by the Commissioner of Labor

At the Request of an Employee or Authorized Employee Representative

If the District has been given notice and opportunity to resolve the activity, policy, or practice and the employee or authorized employee representative still believes that a serious violation of the WVPP remains, or that an imminent danger exists, the employee or authorized employee representative may request an inspection by notifying the Commissioner of Labor of the alleged violation or danger. The notice and request will be in writing, describing with reasonable particularity the grounds for the notice, and be signed by the employee or authorized employee representative. A copy of the written notice will be provided by the Commissioner of Labor to the District or the person in charge no later than the time of inspection, except that on the request of the person giving the notice, the person's name and the names of individual employees or authorized employee representative will be withheld.

A District representative and an authorized employee representative will be given the opportunity to accompany the Commissioner of Labor during an inspection for the purpose of aiding the inspection. Where there is no authorized employee representative, the Commissioner of Labor will consult with a reasonable number of employees concerning matters of safety in the workplace.

The authority of the Commissioner of Labor to inspect the premises pursuant to an employee complaint will not be limited to the alleged violation contained in the complaint. The Commissioner of Labor may inspect any other area of the premises in which they have reason to believe that a serious violation of the workplace violence prevention law exists.

Initiated by the Commissioner of Labor

The Commissioner of Labor may inspect any premises occupied by the District if they have reason to believe that a violation of the workplace violence prevention law has occurred. The current Public Employee Safety and Health (PESH) administrative plan will be used for the enforcement of the workplace violence prevention law, including a general schedule of inspection, which provides a rational administrative basis for the inspection.

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Personnel

SUBJECT: WORKPLACE VIOLENCE PREVENTION POLICY STATEMENT (Cont'd.)

Workplace Risk Evaluation and Developing a Workplace Violence Prevention Program (WVVP)

The District will engage in a process of workplace evaluation designed to identify the risks of workplace violence to which employees could be exposed.

The District will then develop and implement a written WVPP to prevent, minimize, and respond to any workplace violence. The Workplace Violence Advisory Committee, which includes all authorized employee representatives, will oversee and participate in the development of the WVPP. During the development process, the authorized employee representative(s) will provide input on those situations in the workplace that pose a threat of workplace violence.

The WVPP will include the following:

- a) A list of the risk factors identified in the workplace evaluation.
- b) The methods the District will use to prevent incidents of workplace violence. Examples include, but are not limited to:
 - 1. Making high-risk areas more visible to more people;
 - 2. Installing good external lighting;
 - 3. Using drop safes or other methods to minimize cash on hand;
 - 4. Posting signs stating that limited cash is on hand;
 - 5. Providing training in conflict resolution and nonviolent self-defense responses; and
 - 6. Establishing and implementing reporting systems for incidents of aggressive behavior.
- c) A hierarchy of controls to which the program will adhere as follows: engineering controls, work practice controls, and personal protective equipment (PPE).
- d) The methods and means by which the District will address each specific hazard identified in the workplace evaluation.
- e) A system designed and implemented by the District to report any workplace violence incidents that occur in the workplace. The reports must be in writing and maintained for the annual program review.
- f) A written outline or lesson plan for employee program training.

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Personnel

SUBJECT: WORKPLACE VIOLENCE PREVENTION POLICY STATEMENT (Cont'd.)

g) A plan for program review and update on at least an annual basis. This review and update will detail any mitigating steps taken in response to any incident of workplace violence.

Prohibition of Retaliatory Behavior (Commonly Known as "Whistle-Blower" Protection)

The District will not take retaliatory action against any employee because the employee exercises any right accorded to them under this policy.

Training

At the time of hire and annually thereafter, all employees will participate in the District's workplace violence prevention training program.

Notification

This policy will be posted where notices to employees are typically posted. The District will make its WVPP available to employees, authorizes employee representatives, and the Commissioner of Labor upon request and in the work area.

Whenever significant changes are made to the WVPP, the District will provide relevant information to affected employees.

Labor Law Section 27-b 12 NYCRR Section 800.6

NOTE: Refer also to Policies #3410 -- Code of Conduct

#3411 -- Prohibition of Weapons on School Grounds

#3412 -- Threats of Violence in School

#3420 -- Non-Discrimination and Anti-Harassment in the District

#3421 -- Title IX and Sex Discrimination

#5681 -- School Safety Plans

#5684 -- Use of Surveillance Cameras in the District on School

Buses

#5690 -- Exposure Control Program

#6121 -- Sexual Harassment in the Workplace

#6122 -- Employee Grievances

#7350 -- Use of Timeout and Physical Restraint

#7360 -- Weapons in School and the Gun-Free Schools Act

Adoption Date: January 16, 2024

ATTACHMENT 2 Risk Factors and Control Measures

Risks identified in our workplace risk evaluation, and corresponding control methods to reduce those risks, are shown in the tables below for each of our facilities:

Identified Risk	Selected Control(s)	Comments
Uncontrolled Public Access After Hours Some Isolated Work Spaces Working alone Nights & Weekends	Engineering Controls Work Practice Controls	Lock internal doors to control interior access. Security Cameras Ensure Well Lit Workspaces Try to avoid working alone in isolation. Remain Alert and aware of your surroundings. Avoid headphones. SPO present for after school activities as a deterrent. Have communication devices especially when alone: portable radios, cell
Cash on Hand	Engineering Controls Work Practice Controls	phones, landlines in spaces. Use office safes/locking file cabinets. Turn money in to the business office as soon as possible. Do not keep money visible/out in the open.

Burton St - Identified Risk	Selected Control(s)	Comments
Uncontrolled Public Access After Hours Some Isolated Work Spaces Working alone Nights & Weekends	Engineering Controls	Lock internal doors to control interior access. Security Cameras Ensure Well Lit Workspaces
	Work Practice Controls	Try to avoid working alone in isolation. Remain Alert and aware of your surroundings. Avoid headphones. Have communication devices especially when alone: portable radios, cell phones, landlines in spaces.
Public Access for Events during school hours (more so that other buildings)	Engineering Controls	Single Point of Access with sign ins and Raptor system to check criminal back- grounds Security Cameras
	Work Practice Controls	Control where visitors go SPO present as a deterrent Have communication devices: portable radios, cell phones, landlines in spaces.
Cash on Hand	Engineering Controls Work Practice Controls	Use office safes/locking file cabinets. Turn money in to the business office as soon as possible. Do not keep money visible/out in the open.

Bus Garage - Identified Risk	Selected Control(s)	Comments
Uncontrolled Public Access Some Isolated Work Spaces Working alone Nights & Weekends	Engineering Controls	Lock internal doors to control interior access. Security Cameras Ensure Well Lit Workspaces
	Work Practice Controls	Try to avoid working alone in isolation. Remain Alert and aware of your surroundings. Avoid headphones. Have communication devices especially when alone: portable radios, cell phones, landlines in spaces. Keep overhead doors closed when possible
Unsecure Exterior Spaces	Engineering Controls	Improve exterior lighting Security Cameras
	Work Practice Controls	Control/Trim Vegetation to eliminate hiding spots
Tools and Fuels available for use as weapons	Engineering Controls	Provide lockable cabinets Locking fuel pump
	Work Practice Controls	Keep members of the public out of the mechanics work space whenever possible Keep fuel pumps locked & shut off when not in use

Fenner Fields & Facilities Dept Out Buildings - Identified Risk	Selected Control(s)	Comments
Uncontrolled Public Access	Engineering Controls	Lock internal doors to control interior access.
Some Isolated Work Spaces		Install Security Cameras?
Working alone Nights & Weekends		Ensure Well Lit Workspaces
	Work Practice Controls	Try to avoid working alone in isolation.
		Remain Alert and aware of your surroundings. Avoid headphones.
		Have communication devices especially when alone: portable radios, cell phones, landlines in spaces.
		Keep overhead doors closed when possible
Unsecure Exterior Spaces	Engineering Controls	Improve exterior lighting
		Install Security Cameras?
	Work Practice Controls	Control/Trim Vegetation to eliminate hiding spots
		Remain Alert and aware of your surroundings. Avoid headphones.
Tools and Fuels available for use	Engineering Controls	Provide lockable cabinets
as weapons		Locking fuel storage/pumps
	Work Practice Controls	Keep members of the public out of work space whenever possible
		Keep fuel storage/pumps locked & shut off when not in use

ATTACHMENT 3

Workplace Violence Prevention Training Outline

Information and training for all employees:

- I. Overview of Requirements of the Workplace Violence Regulations
 - A. **Develop a written policy statement.** Employers must develop a written policy statement describing the goals and objectives of their workplace violence prevention program and the notification policies employees should follow in the event of a workplace violence incident. The policy statement should describe how employees can participate in the workplace violence program through an authorized employee representative. The policy statement must be posted where notices to employees are normally posted.
 - B. **Conduct a risk evaluation**. Employers must evaluate their workplace to determine what factors exist that might place employees at risk of occupational assaults or homicides. The risk evaluation includes an examination of any records of workplace violence incidents over the previous year; an assessment of any relevant policies, work practices, and work procedures that may impact the risk of workplace violence; and an evaluation of the physical workplace environment.
 - C. Develop a workplace violence prevention program. Employers must develop and implement a workplace violence prevention program, with input from employees through an authorized employee representative. The program must include: the risk factors identified through the risk evaluation; how the identified risks will be addressed; the methods that will be used to try to prevent workplace violence incidents; a system to report and record any workplace violence incidents that may occur; a written outline or lesson plan for employee trainings on workplace violence risk; and a plan to review and update the program at least once a year.
 - D. Provide training and information for employees. Employers must provide each employee with information and training on the risks of workplace violence in their workplace(s) at least once a year and any time significant changes are made to the workplace violence prevention program.
- II. Risk factors that were identified in the risk evaluation and implemented control measures
 - A. See Attachment #2 for identified Risk Factors
 - B. Employees can take the following measures to protect themselves from identified risks: such as, but not limited to:
 - i. Use District Incident alert and notification procedures
 - ii. Avoid Isolated and/or Dark Areas, Secure Access to Work Areas
 - iii. Follow District Emergency procedures
 - iv. Use of security alarms and other devices
 - v. Other existing policies, procedures and work practices relevant to WPV: 3210, 3411, 3412, 3420, 5681, 5684, 5685, 7313, 7314, 7320, 7350, 7360, 7560
 - vi. Procedures to report incidents of workplace violence
- III. The Workplace Violence Prevention Program is on file in the Assistant Superintendent/Business Official's office and you may email or call to request a paper copy. It is also on the district website.

- IV. Privacy Concerns How will sensitive information be handled?
 - A. Information otherwise kept confidential for security reasons does not have to be disclosed to all employees. Examples of confidential information include but are not limited to information that would interfere with law enforcement investigations or judicial proceedings, would deprive a person of a right to a fair trial, would identify a confidential source or disclose confidential information relating to a criminal investigation, would reveal criminal investigative techniques or procedures except routine techniques and procedures, or would endanger the life or safety of any person. As such, the district reserves the right to restrict the release of this type of information only to those administrators, SPOs, Law Enforcement and Legal Counsel involved in related investigation & follow through of the matter, and others as approved by the district's legal counsel and/or required by law.
 - B. If the case is a "privacy concern case," remove the name of the employee who was the victim of the workplace violence and enter "PRIVACY CONCERN CASE" in the space normally used for the employee's name. Privacy concern cases include cases involving:
 - Injury or illness to an intimate body part or the reproductive system;
 - Injury or illness resulting from a sexual assault;
 - Mental illness;
 - HIV infection;
 - Needle stick injuries and cuts from sharp objects that are or may be contaminated with another person's blood or other potentially infectious material; and
 - Other injuries or illnesses, if the employee independently and voluntarily requests that his or her name not be entered on the report.

^{*} Note: Employees who are victims of workplace violence can independently and voluntarily request that their name not be entered on the report.

ATTACHMENT 4

Workplace Violence Incident Report

1. Date of incident:	Time of day when the incident occurred:	
2. District location (i.e., building) where the incident occurred:		
3. *Names and job titles of <i>employ</i>	ree victims:	
4. Names and job titles of other inv	volved <i>employees</i> , if any:	
	rs involved (not employees), if any:	
	sing from the incident and to whom, if any:	
7. Names of witnesses, if any:		

* **Note**: If the case is a "privacy concern case," remove the name of the employee who was the victim of the workplace violence and enter "**PRIVACY CONCERN CASE**" in the space normally used for the employee's name. Privacy concern cases include cases involving:

- Injury or illness to an intimate body part or the reproductive system;
- Injury or illness resulting from a sexual assault;
- Mental illness:
- HIV infection;
- Needle stick injuries and cuts from sharp objects that are or may be contaminated with another person's blood or other potentially infectious material; and
- Other injuries or illnesses, if the employee independently and voluntarily requests that his or her name not be entered on the report.

^{*} **Note**: Employees who are victims of workplace violence can independently and voluntarily request that their name not be entered on the report.

8. Provide a detailed description of the incident below, inc	luding the events leading up to the incident and how
the incident ended:	
	_
Date Report Submitted	*Signature (unless privacy concern)
Name of Immediate Supervisor/Principal	*Print Name (unless privacy concern)
Additional Information:	
 Attach any relevant documents, emails, or or 	ther evidence related to the incident.
Record attachment(s) description(s):	