Workplace violence prevention program

Plattsburgh City School District

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## Workplace Violence Prevention Policy

The Plattsburgh City School District (PCSD) is committed to the safety and security of our employees. Workplace violence presents a serious occupational safety hazard to personnel and to the public.

The term "workplace violence" is defined as any physical assault, threatening behavior or verbal abuse occurring in the work setting. 12 NYCRR Part 800.6(d)(ll) defines workplace violence as "Any physical assault or acts of aggressive behavior occurring where a public employee performs any work-related duty in the course of his or her employment including but not limited to: an attempt or threat, whether verbal or physical, to inflict physical injury upon an employee, any intentional display of force which could give an employee reason to fear or expect bodily harm, intentional and wrongful physical contact with a person without his or her consent that entails some injury, and stalking an employee with the intent of causing fear or material harm to the physical safety and health of such employee when such stalking has arisen through and in the course of employment."

Acts of violence against any of our employees where any work-related duty is performed will be thoroughly investigated and appropriate action will be taken, including involving law enforcement when warranted.

All employees are responsible for helping to create an environment of mutual respect for each other, students and visitors, following all policies, procedures and program requirements, and assisting in maintaining a safe and secure work environment.

This policy is designed to meet the requirements of NYS Labor Law 27-b and was developed in conjunction with employee representatives.

In accordance with the requirements set forth in the Workplace Violence Prevention Policy, the district will:

* Conduct an evaluation of the physical environments;
* Develop a Workplace Violence Prevention Program and;
* Review workplace violence incident reports annually to identify trends in the types of incidents reported in the workplace (if any) and review of the effectiveness of the mitigating actions taken.
* Provide annual Workplace Violence Prevention Training

The goal of this policy is to promote the safety and well-being of all people in our workplace. All incidents of violence or threatening behavior will be responded to immediately upon notification.

**Retaliation:**

Retaliatory action against anyone acting in good faith who has made a complaint of workplace violence, who has reported witnessing workplace violence or who has been involved in reporting, investigating, or responding to workplace violence is a violation of this policy.

**Notification:**

All PCSD personnel are responsible for notifying their supervisor/administrator of any violent incident or threatening behavior, including threats they have witnessed, received or have been told that another person has witnessed or received. Personnel may also report such incidents directly to the designated contact person listed below.

**Designated Contact Person**: Susan D. Wilson

**Title:** Director of Management

49 Broad Street

Plattsburgh, NY 12901

**Phone:** (518) 957-6003

**E-mail:** [sdwilson@plattscsd.org](mailto:sdwilson@plattscsd.org)

### INTRODUCTION:

This Workplace Violence Prevention Program is designed to prevent, minimize and respond to any workplace violence incidents in accordance with Labor Law 27-b and Code Rule 800.6, “Public Employer Workplace Violence Prevention Programs.”

Workplace Violence is defined as any physical assault or acts of aggressive behavior occurring where a public employee performs any work-related duty during his or her employment including but not limited to:

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

### RISK FACTORS:

The Plattsburgh City School District has evaluated its workplaces to determine the presence of factors or situations in such workplaces that might place employees at risk of workplace violence.

Below is a list of the risk factors identified as a result of the workplace examinations;

* Violence directed at employees by students.
* Violence directed at employees by parents or guardians of students.
* Violence against coworkers, supervisors, or administrators by a present or former employee.
* Violent acts by approved contractor or visitor to the workplace upon an employee.
* Bomb threats.
* Intrusions.
* Building Access (Students and Staff).
* Harassment that could lead to violence.
* Sexual Harassment.
* Altercations (Staff injured when intervening in student altercation).

Employee vulnerability varies across the workplace and is based on several factors. Workplaces with increased vulnerability include work practices that can involve;

* Working alone or in small numbers.
* Working in public settings.
* Working in a setting with uncontrolled access to the workplace.
* Working late after typical operating hours.
* Working early morning hours and working evening shifts.

### WORKPLACE VIOLENCE PREVENTION:

Methods used to prevent the occurrence of workplace violence incidents include but are not limited to:

* Enforcing existing workplace Policies and procedures.
* Training to increase employee awareness of the signs/effects of workplace violence. The District requires that all employees review the Workplace Violence Prevention Program annually.
* The importance of swift reporting of workplace violence incidents and injuries
  + The District has developed a new form for employees to fill out if an incident occurs. These forms will be made available on the District’s website and the nurse’s office.
  + The form must be shared with their building administrator and the original should be sent to the Workplace Violence Coordinator.
  + Providing training in conflict resolution and nonviolent self-defense responses - The District has had several administrators, psychologists, social workers, and teachers trained in C.P.I. This training is provided annually to staff members.
  + Establishing and implementing reporting systems for incidents of workplace violence – A new form was developed for workplace violence incidents. Training will be provided to nurses to inform them that these forms must be made available in the Nurses’ Office of each building.
  + Eliminating isolated work areas.
  + Installing security hardware.
  + Implementing access control procedures.
  + The District has created, and enforces, a detailed Code of Conduct to describe the expected behavior of students, staff, and visitors to school buildings and the disciplinary actions resulting from violations of the code.
  + District Wide Safety Plan and Building Wide Emergency Response Plans.
  + Engineering Controls (Visitor Aware App, Lockdown System, Security vestibules).
  + Threat Assessment Team.

### HIERARCHY OF CONTROLS:

In situations where the risk associated with a potential workplace violence hazard cannot be eliminated, control measures can be used to reduce the risk to employees. There are three main types of controls to help safeguard employees. The three controls are listed in order of the most effectiveness. Engineering controls, followed by work practice controls and lastly, personal protective equipment.

Engineering Controls**:** eliminates or reduces risk through physical changes to the workplace. Some examples of this would be as follows:

* Secure vestibules
* Greeter windows
* Lockdown buttons
* Increase lighting in remote areas
* Installation of fencing and gates

Work Practice Controls: reduce the hazard by changing organizational policies and procedures. Examples of Work Practice Controls include:

* Implementing Visitor Management procedures which require all visitors to provide a License or Passport to enter a building. Once they show this proof, the visitor can enter with a “visitors badge which must be worn at all times within the building”.
* Provide training to employees on de-escalation techniques and recognizing precursors to violence.
* Providing handheld radios to a subset of employees

Personal Protective Equipment (PPE): For the most part, this type of intervention is relevant to workplace violence prevention. However, there can be some job duties PPE would be appropriate; body armor for youth safety advocates, or in some cases aids could use specific PPE based upon student anticipated behaviors.

Policies, plans, and procedures applicable to workplace violence prevention, hazard mitigation and notification are consistent with the above control methods.

### HAZARD MITIGATION:

Hazard mitigation includes the methods and means by which the employer shall address each specific risk identified in the workplace evaluation. The table in Attachment No. 1 lists the risk factors compiled and assigns control measures for each specific hazard identified.

### INCIDENT REPORTING:

If the workplace violence situation warrants a response from emergency services, all building occupants are authorized to request help via established and available communication tools. Additionally, all incidents of workplace violence, whether they result in physical harm or not, are to be reported in accordance with the District’s Workplace Violence Incident Report Form. This report must be sent to the Designated Workplace Violence Prevention Coordinator and building principal. It will be maintained for use in the annual Workplace Violence Prevention Program review and update.

The report must include at a minimum:

* Workplace location where incident occurred;
* Time of day/ shift when incident occurred;
* A detailed description of the incident, including events leading up to the incident and how the incident ended;
* Names and job titles of involved employees;
* Name or other identifier of other individual(s) involved;
* Nature and extent of injuries arising from the incident;
* Names of witnesses.

### EMPLOYEE TRAINING:

Each employee must be provided with information and training on the risks of workplace violence in their workplace(s). Training must be provided at the time of the employee’s initial assignment and at least annually thereafter. Information as necessary shall be provided to affected employees whenever significant changes are made to the workplace violence prevention program.

At a minimum training shall address the following:

* The requirements of the workplace violence regulations, described here, and the risk factors that were identified in the risk evaluation determination;
* Measures that the employees can take to protect themselves from the identified risks including specific procedures that the employer has implemented to protect employees, such as incident alert and notification procedures, appropriate work practices and emergency procedures.
* The location of the written workplace violence prevention program and how to obtain a copy

### ANNUAL REVIEW:

The Workplace Violence Prevention Program shall be reviewed and updated on at least an annual basis. The employer, with the participation of authorized employee representative(s), shall also conduct a review of the Workplace Violence Incident Reports, at least annually, to identify trends in the types of incidents in the workplace and review of the effectiveness of the mitigating actions taken.

### DISCLOSURE:

Nothing in this plan shall require the disclosure of information otherwise kept confidential for security reasons. Such information may include information which, if disclosed:

* Would interfere with law enforcement investigations or judicial proceedings;
* Would deprive a person of a right to a fair trial or impartial adjudication;
* 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

### LIST OF RISKS AND MITIGATION EFFORTS

|  |  |
| --- | --- |
| **Risks Identified through Record Review and/or Risk Evaluation** | **Methods and Means by which the Risk is Being Addressed** |
| **Violations Against Persons:** **(**Assault, Harassment, Hazing, Weapons Possession, Incitement of Violence, Altercations, Reckless Endangerment | **Work Practice Controls:** The district has created, and enforces, a detailed Code of Conduct to describe the expected behavior of students, staff and visitors to school buildings and the disciplinary actions resulting for violations of the code. Use of Agency phones in each classroom/office space as well as distributed two-way radios for immediate communication and notification for crisis response and/or emergency services. |
| **Bomb Threats:** | **Work Practice Controls:** The district has created a District Wide School Safety Plan that addresses bomb threats. All District administrators have familiarized themselves with the Bomb Threat Standards outlined in the Building-Level Emergency Response Plan so that appropriate decisions may be made depending on the exact nature of the situation |
| **Intrusions:** | **Work Practice Controls:** The district has created a District Wide School Safety Plan that addresses intrusions. The Building-Level Emergency Response Plan specific procedures will be followed in the event of an intrusion.  **Engineering Controls:** The district has Building Access Control Systems, secure vestibules, radio communication, and Emergency Notification Systems. |
| **Building Access:** | **Work Practice Controls:**  Students must use an entrance staffed by a PCSD employee. Visitors are required to sign in at the security desk where security personnel are present. Visitors are required to wear visitor passes.  **Engineering Controls**: Staff must wear and scan in with ID Cards with pictures at all school buildings. The district uses visitor screening software. |
| **Harassment/Sexual Harassment:** | **Work Practice Controls:** If harassment rises to the level of workplace violence, the procedures in the District Policy Against Workplace Discrimination and Harassment will be followed. If sexual harassment rises to the level of workplace violence, the procedures in the District Policy Against Workplace Sexual Harassment will be followed. Staff receive sexual harassment training annually at the beginning of each year. |
| **Altercations (Staff injured when intervening in student altercations)** | **Workplace Controls:** The district has in place, and enforces a policyfor School Conduct and Discipline which addresses students fighting or engaging in violent behavior. |
| **Violent Behavior:** | **Workplace Controls:** The district has created a Crisis Response Manual that addresses the Early Detection of Potentially Violent Behavior. The District Wide School Safety Team will make recommendations for appropriate annual training for students and staff in violence prevention and mental health. Training to increase employee awareness of the signs/effects of workplace violence, the importance of swift reporting of workplace violence incidents and injuries. Establishing and implementing reporting systems for incidents of workplace violence. Employee training occurs in child abuse, DASA, school violence prevention, emergency response protocol, etc. District employees who provide after hours one-on-one tutoring are advised to do so virtually |