

2024

WORKPLACE VIOLENCE
PREVENTION PROGRAM



CENTRAL SQUARE CENTRAL
SCHOOL DISTRICT – 2024-2025
BOE Approved August 5, 2024

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Workplace Violence Prevention Program

Workplace violence is any physical assault or act of aggressive behavior occurring where an employee performs any work-related duty in the course of their employment including, but 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 an employee without their consent that entails some injury;
- 4) 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.

New York State requires every public employer, including school districts, 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. This written document serves as the District's Workplace Violence Prevention Program (WVPP). It should be read in conjunction with the district's corresponding workplace violence prevention policy statement which can be found on the district's website.

Purpose of the WVPP

The purpose of this WVPP is to provide information to employees, authorized employee representatives, and supervisors about preventing and responding to incidents of workplace violence or threats of violence. The goals of this WVPP are to:

- 1) Reduce the risk of workplace violence to employees; and
- 2) Ensure that any incident, complaint, or report of violence is taken seriously and dealt with appropriately and as expeditiously as possible.

This WVPP outlines the major components of the district's effort to meet these goals. At the core of this WVPP is the 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.

Workplace Risk Evaluation

The district has conducted a workplace risk evaluation consisting of:

- 1) A Record Examination

The district has examined all records of workplace violence incidents in the past year to identify patterns in the: types and cause of incidents; areas of the workplace where incidents occur; incidents that involve specific workplace operations; or incidents which involve specific individuals.

Examples of records include, but are not limited to:

- a. Employee Accident and Illness Reports;
- b. Injury and illness documentation;
- c. Workers' compensation reports;
- d. Disciplinary reports;
- e. Union grievances and records of threats.

2) An Assessment of Administrative Risk Factors

The district has assessed all relevant policies, practices, and procedures that may impact the risk of workplace violence. Examples of relevant policies, practices, and procedures include, but are not limited to:

- a. The district-wide school safety plan;
- b. Building-level emergency response plan(s);
- c. Policies related to non-discrimination and anti-harassment, visitors to the school, threats of violence in school, prohibition of weapons on school grounds, use of timeout and physical restraint, and weapons in school;
- d. Use of ID badges;
- e. Procedures related to controlling or diffusing a potentially violent situation.

3) The district has evaluated 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 District employees include, but are not limited to, the following:

- a. Working in public settings;
- b. Working late night or early morning hours;
- c. Exchanging money with the public;
- d. Working alone or in small numbers;
- e. Working in a setting with uncontrolled access to the workplace;
- f. Working in a setting where previous security problems have occurred;
- g. Having a mobile workplace assignment;
- h. Working with a population which might expose someone to potentially violence persons;
- i. Having duties that include the delivery of passengers, goods, or services.

Risk factors identified during the examination, assessment, and evaluation are listed in the WVPP, along with the methods and means by which each risk is being addressed by the district. The district is responsible for addressing all risk factors that its employees are potentially exposed to.

Incidents of workplace violence must be carefully documented and analyzed in order to make improvements to the WVPP 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.

1) Engineering Controls

Engineering controls eliminate or reduce the risk of workplace violence through physical changes to the workplace. Examples of engineering controls include:

- a. Increasing lighting in remote areas;
- b. Designing secure building access;
- c. Installing security hardware;
- d. Eliminating isolated work areas;
- e. Installing drop safes;
- f. SPO's in each building.

2) Work Practice Controls

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:

- a. Increased staffing;
- b. Employment of security personnel;
- c. Implementing building access control procedures, for example, requiring badges to enter;
- d. Instituting communication procedures across shifts or classes to share information regarding agitated clients or students;
- e. Providing information to employees on the criminal history or violence of clients, inmates, or customers;

3) Personal Protective Equipment (PPE)

PPE is generally considered the least effective control measure but may be needed to enhance other control measures or minimize potential injury severity when other control measures fail. Examples of PPE include:

- a. Ballistic or stab resistant body armor;
- b. Riot gear including protective helmets and shields;
- c. Eye and face protection.

Workplace Violence Prevention

Prevention of violence in the workplace is the responsibility of the district and all employees have a role to play in keeping the workplace safe from violence. Employees, authorized employee representatives,

and supervisors should be familiar with the early warning signs of potential workplace violence and workplace issues that may trigger workplace violence in order to intervene early and reduce the likelihood of workplace 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:

- 1) Direct or veiled threats of harm.
- 2) Intimidation, belligerence, bullying, or other inappropriate behavior directed at others.
- 3) Numerous conflicts with supervisors and employees and/or verbal comments expressing hostility directed at coworkers, supervisors, or others.
- 4) Bringing an unauthorized weapon to work, brandishing a weapon in the workplace, making inappropriate reference to guns, or expressing fascination with weapons.
- 5) 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.
- 6) 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.
- 7) Signs of abuse of drugs or alcohol on or off the job.
- 8) Extreme or uncharacteristic changes in behavior or displays of emotion.
- 9) Employees with ongoing domestic difficulties.
- 10) Employees with a temporary order of protection against someone.

These behaviors or situations should be reported to an employee's supervisor and/or the Workplace Violence Prevention Coordinator. 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.

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

Employee issues include:

- 1) A negative performance review.
- 2) An unwelcome change in role due to performance or reorganization in the workplace.
- 3) An unwelcome change in work schedule.
- 4) Criticism of an employee's work performance.

- 5) A conflict with a coworker or supervisor.
- 6) Personal stress outside the workplace.
- 7) Increased workload or pressure.

Workplace issues include:

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

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

To help prevent a violent situation from occurring, the district will provide training to employees, authorized employee representatives, and supervisors on recognizing the early warning signs of potential workplace violence and workplace issues that may trigger workplace violence. With this knowledge, the district can intervene early to prevent a violent incident from occurring.

In addition to training on recognizing the early warning signs of potential workplace violence and workplace issues that may trigger workplace violence, the district will review de-escalation protocols in an effort to proactively prevent incidents of workplace violence:

Risk Factors and Control Measures

Risks identified in the district’s workplace risk evaluation, and corresponding control methods to reduce those risks, are shown in the tables below.

General to the District

The following chart lists general risks in the district which are not limited to a specific workplace, as well as the control method for addressing each risk.

Identified Risk	Selected Control(s)	Comments
Physical behaviors by behaviorally challenged special needs students	Training on early warning signs of potential workplace violence and workplace issues that may trigger workplace violence. Review de-escalation protocols.	

Identified Risk	Selected Control(s)	Comments
Staff intervention in physical confrontations between students	Training on early warning signs of potential workplace violence and workplace issues that may trigger workplace violence. Review de-escalation protocols.	
Bypassing visitor entry and/or registration protocols, by providing visitor access to buildings by propped doors or by holding doors open for visitors	Advise students and staff about visitor entry protocol	
Lack of contact/point person when building secretary is absent to report incident of violence	Designate alternate contact in each building.	

Reporting Workplace Violence

Any employee or authorized employee representative who becomes aware of a physical assault, threatening behavior, or verbal abuse in the workplace must immediately provide written notice of the facts and circumstances of the violent incident to a supervisor or a Workplace Violence Prevention Coordinator. If the report was provided to a supervisor, the supervisor must immediately forward the report to the Workplace Violence Prevention Coordinator.

If 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 should immediately call 911 to obtain law enforcement and/or medical assistance. The employee should also immediately notify their immediate supervisor.

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

Reporting to the Commissioner of Labor

If, after being given notice and a reasonable opportunity to resolve the activity, policy, or practice, the matter has not been resolved 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 filing a complaint with the PESH bureau at the Department of Labor's Division of Safety and Health using the complaint form linked here: <https://dol.ny.gov/notice-alleged-safety-or-health-hazard-pesh7> 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 ask.shnypeshlabor.ny.gov. 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.

Investigating and Responding to Reports of Workplace Violence

Upon receipt of written notice of an incident of workplace violence, the Workplace Violence Prevention Coordinator will work with other individuals, such as those on the Workplace Violence Prevention Advisory Committee and/or District administration, to:

- 1) Confirm any injured persons receive prompt and appropriate medical care. This includes, but is not limited to, providing transportation of any injured persons to medical care.
- 2) If not already reported, report the incident to the appropriate authorities as required by applicable laws and regulations.
- 3) As applicable, secure the premises to safeguard evidence and reduce distractions during the response period.
- 4) Complete a Workplace Violence Incident Report as soon as possible, which, at a minimum, will contain the following information:
 - a. Workplace location where incident occurred;
 - b. Time of day/shift when incident occurred;
 - c. A detailed description of the incident, including events leading up to the incident and how the incident ended;
 - d. Names and job titles of involved employees;
 - e. Name or other identifier of other individual(s) involved;
 - f. Nature and extent of injuries arising from the incident; and
 - g. Names of witnesses.

If the case is a privacy concern case, a Workplace Violence Incident Report will still be completed. However, before sharing a copy of the Workplace Violence Incident Report with any party other than the Commissioner of Labor, the District will remove the name of the employee who was the victim of the workplace violence and will instead enter "PRIVACY CONCERN CASE" in the space normally used for the employee's name.

The district will treat incidents involving the following injuries or illnesses as privacy concern cases:

- a. An injury or illness to an intimate body part or the reproductive system;
- b. An injury or illness resulting from a sexual assault;
- c. Mental illness;
- d. HIV infection;

- e. 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
- f. Other injuries or illnesses, if the employee independently and voluntarily requests that their name not be entered on the Workplace Violence Incident Report.

The district will maintain all Workplace Violence Incident Reports for use in the district's annual program review and updates.

- 5) Thoroughly investigate the incident and ensure that the district corrects the activity, policy, or activity in a reasonable timeframe. If there is a developing pattern of workplace violence incidents which may involve criminal conduct or serious injury, the district will attempt to develop a protocol with the District Attorney or law enforcement 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 choose to file a criminal complaint after a workplace violence incident.
- 6) Identify and implement actions to work to prevent similar occurrences from happening in the future.
- 7) Address the need for appropriate treatment for employees who were victims or witnesses 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.

Confidentiality

The district is not required to disclose information that would otherwise be kept confidential for security reasons. This information may include information which, if disclosed, would:

- 1) Interfere with law enforcement investigations or judicial proceedings;
- 2) Deprive a person of a right to a fair trial or impartial adjudication;
- 3) Identify a confidential source or disclose confidential information relating to a criminal investigation;
- 4) Reveal criminal investigative techniques or procedures, except routine techniques and procedures; or
- 5) Endanger the life or safety of any person.

Training

At the time of hire and annually thereafter, all employees will participate in the District's WVPP training. At a minimum, this training will include information on:

- 1) The requirements in law related to workplace violence prevention.
- 2) The details of the district's written workplace violence prevention program including, but not limited to:

- a. The risk factors in their workplace that were identified in the district's risk evaluation that do not need to be kept confidential for security reasons;
- b. The measures that employees can take to protect themselves from the identified risks including specific procedures that the district has implemented to protect employees such as incident alert and notification procedures, appropriate work practices, emergency procedures, and use of security alarms and other devices;
- c. The early warning signs of potential workplace violence and workplace issues that may trigger workplace violence;
- d. Procedures on how to respond to and report incidents of workplace violence;
- e. How the District will handle privacy concern cases, confidential information, and other sensitive information.

3) The location of the written WVPP and how to obtain a copy.

Additionally, retraining is required for all employees any time there is a significant change to the WVPP, a newly identified risk factor, or a control measure addition.

Recordkeeping Requirements

All incidents of workplace violence must be documented in a Workplace Violence Incident Report. The district will utilize the [Central Square Central School District Employee Accident and Illness Report](#) (Appendix A) for this purpose. Workplace violence incidents that cause a work-related death or an injury that meets the recording criteria of the PESH log of injuries and illnesses should be recorded on both the PESH log and the Workplace Violence Incident Report. For more information on the PESH log of injuries and illness, refer to the PESH website, <https://dol.ny.gov/public-employee-safety-health>.

Employee Accident and Illness Reports provide a written description when an incident occurs so that the Workplace Violence Prevention Coordinator, in conjunction with the Workplace Violence Prevention Advisory Committee and/or District administration, can evaluate why the incident occurred and implement an appropriate safeguard or control measure to reduce the risk of those incidents from happening again. The Employee Accident and Illness Report also creates a historical record. The Employee Accident and Illness Reports will be reviewed at least once a year to determine if and how the WVPP should be updated.

Program Review

On an annual basis, the Workplace Violence Prevention Advisory Committee will oversee the process of reviewing and, if necessary, updating the District's WVPP and District policy #6190R - [Workplace Violence Prevention Policy Statement](#). As part of this process, the district will:

- 1) With the participation of all authorized employee representatives, review the Employee Accident and Illness Reports from the past year to identify trends in the types of incidents in the workplace and review the effectiveness of the mitigating actions taken;
- 2) Work to determine and address the root cause of incidents;
- 3) Determine if any change need to be made to control measures; and

- 4) Assess whether the reporting and recordkeeping systems have been effective in collecting all relevant information.

Additionally, the District will conduct an evaluation of the physical environment when facilities are changed and on a regular basis to assess the functionality of equipment.

Labor Law Section 27-b
12 NYCRR Section 800.6

APPENDIX A

WORKERS' COMP CARRIER: NCACOMP, INC 14 LAFAYETTE SQUARE SUITE 700 BUFFALO, NY 14203	CENTRAL SQUARE SCHOOL DISTRICT EMPLOYEE ACCIDENT AND ILLNESS REPORT	EMPLOYEE'S PHONE:	
*** ALL PARTS MUST BE COMPLETED NEATLY AND IN FULL ***			
SOC. SECURITY NO.	NAME (LAST) (FIRST) (MI)	SEX	MARITAL STATUS
HOME ADDRESS	CITY	STATE	ZIP
DATE OF BIRTH		AGE	
JOB TITLE	WORK STATUS PART <input type="checkbox"/> FULL <input type="checkbox"/>	DATE OF HIRE	TIME BEGAN WORK AM or PM
TIME OF INJURY AM or PM		NAME OF IMMEDIATE SUPERVISOR	
NAME OF SCHOOL			
EMPLOYEE'S STATEMENT - FULLY EXPLAIN THE NATURE OF THE INJURY/ILLNESS (HOW AND WHY ACCIDENT OCCURRED; ALL BODY PARTS INJURED; WAS AN OBJECT INVOLVED)			
DATE OF INJURY/ILLNESS	LOCATION ADDRESS	DATE SUPERVISOR WAS NOTIFIED	
IF THIS IS A RECURRENCE OF A PREVIOUS INJURY OR ILLNESS? YES <input type="checkbox"/> NO <input type="checkbox"/>		IF "YES" GIVE DETAILS:	
SIGNATURE OF EMPLOYEE:		DATE SIGNED:	
SUPERVISOR'S STATEMENT			
DO YOU CONFIRM THIS INJURY OR ILLNESS? YES <input type="checkbox"/> NO <input type="checkbox"/>			
HOW COULD THE INJURY HAVE BEEN PREVENTED?			
NAME OF WITNESSES:	SIGNATURE OF WITNESSES:		
WAS MEDICAL TREATMENT PROVIDED TO EMPLOYEE:			
NAME OF HOSPITAL OR PHYSICIAN:			
ADDRESS:		DATE OF FIRST TREATMENT:	
ANY EMT OR AMBULANCE SERVICE USED?			
DID THE EMPLOYEE STOP WORK BECAUSE OF THIS INJURY/ILLNESS? YES <input type="checkbox"/> NO <input type="checkbox"/>		IF "YES" FIRST DATE OF LOST TIME:	
HAS THE EMPLOYEE RETURNED TO WORK? YES <input type="checkbox"/> NO <input type="checkbox"/>		IF "YES" ON WHAT DATE:	
SIGNATURE OF SUPERVISOR:		DATE SIGNED:	
CERTIFICATION: I CERTIFY THAT THIS ACCIDENT/INJURY REPORT IS COMPLETE AND ACCURATE, FALSE REPRESENTATIONS COULD RESULT IN CIVIL AND CRIMINAL PENALTIES.			
SIGNATURE OF EMPLOYEE:		DATE:	
THIS REPORT IS BASED ON INFORMATION PROVIDED BY THE ABOVE EMPLOYEE:			
SIGNATURE OF SUPERVISOR:		DATE:	
RECEIVED PERSONNEL OFFICE:		DATE:	