



McGraw Central School District Workplace Violence Prevention Program

This program is known as the McGraw Central School District Workplace Violence Prevention Program and has been developed to comply with Code Rule 800.6, “Public Employer Workplace Violence Prevention Programs”, of the New York State Labor Law.

Purpose and Intent

The purpose of this program is to prevent and minimize the hazards of workplace violence to employees of the McGraw Central School District and enable the district to evaluate the risk of potential violence, then design and implement protection programs to address those risks.

Application

This program applies to all employees of the McGraw Central School District, including teachers, administrators, support staff, and contractors.

Employee Involvement

The McGraw Central School District is committed to employee involvement in its Workplace Violence Prevention Program (the “Program”). Employees are encouraged to report any potential workplace violence hazards to their supervisor or another designated person as more specifically set forth below.

Employees also have the right to participate in the development and review of the Program.

More specifically, the participation of Authorized Employee Representative(s) shall be included in:

- creating a school district policy statement;
- evaluating the school district physical environment;
- developing this workplace violence prevention program;
- reviewing workplace violence incident reports (at least annually) to identify trends in the types of incidents in the workplace; and
- reviewing the effectiveness of mitigating actions taken.

Definitions

The terms below have the following meanings for the purposes of this program:

- “Employee” or “employee”: Any person employed by the McGraw Central School District, including teachers, administrators, support staff, and contractors.
- “Authorized Employee Representative”: 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.
- “Imminent Danger”: 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 such danger can be eliminated.
- “Serious physical harm”: 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 Article 130 of the New York State Penal Law.

- “Supervisor”: Any person within the school 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.
- “Workplace”: Any location away from an employee’s domicile, permanent or temporary, where any employee performs any work-related duty in the course of his or her employment by the school district.
- “Workplace violence:” Any physical assault or act of aggressive behavior occurring where a McGraw Central School District 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 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.

Workplace Violence Prevention Program

The McGraw Central School District Workplace Violence Program includes the following elements:

- District Policy Statement – *See Appendix 1*. This shall be posted where notices to employees are normally posted.
- Risk Evaluation and Determination: The McGraw Central School District has conducted a risk evaluation to identify potential workplace violence hazards. The risk evaluation includes an examination of records, an assessment of relevant policies and work practices, and an evaluation of the physical environment.
- Prevention Methods: The McGraw Central School District has implemented a number of prevention methods to reduce the risk of workplace violence, including:
 - A workplace violence policy statement that is posted throughout the district and communicated to all employees;
 - Employee training on workplace violence prevention;
 - Security measures at all school facilities; and
 - A system for reporting and investigating workplace violence incidents.

Risk Evaluation and Determination

On an annual basis, the McGraw Central School District shall:

1. Examine records including those compiled in the previous year that concern workplace violence incidents to identify patterns in the type and cause of injuries. Examples of records to be used:
 - a. Injury and illness documentation (SH 900, SH 900.1 and SH 900.2);
 - b. Workplace violence incident reports; and/or
 - c. Workers’ compensation reports and disciplinary reports.

2. Assess policies, practices, and procedures that may impact the risk of workplace violence.
Examples of what may be assessed:
 - a. Policies regarding sexual harassment;
 - b. Firearms policies; and/or
 - c. Work practices requiring work in public settings, including exchanging money with the public, working alone or in small numbers, and working with potentially violent clients.
3. Evaluate the physical work environment for the presence of factors which may place employees at risk of workplace violence, with the participation of the Authorized Employee Representative(s).

Response Plans

The McGraw Central School District has a response plan to address workplace violence incidents and other related incidents. The response plan includes procedures for:

- Evacuating employees and students from a dangerous area;
- Notifying law enforcement and emergency medical services;
- Providing support to victims of workplace violence.

The McGraw Central School District maintains safety plans/emergency response plans that include considerations for safety and health that meet all applicable federal, state, local laws, regulations and ordinances. These plans can be found on the McGraw Central School District website and at the District Office, Business Office, Facilities Office, Health Office in each school building, and Main Office in each school building.

Prevention Methods

The following section provides a summary of the methods the McGraw Central School District will use to try to prevent workplace violence incidents.

In situations where the hazard cannot be completely eliminated, the school district shall implement control measures to reduce the risk to employees. A hierarchy of controls to which this program shall adhere are as follows: engineering controls, work practice controls, and personal protective equipment.

- A. Engineering Controls reduce the hazard through substitution or design.

An example of an engineering control is the secure vestibule located at the visitor entrance to the Main Office at the Elementary School and High School.

Engineering controls may not always be feasible. If engineering controls are not feasible, the school district will then consider work practice controls.

- B. Work Practice Controls reduce the hazard by changing organizational policies and procedures.

An example of a work practice control is having Elementary parents drop off their children outside the cafeteria in the morning.

- C. Personal Protective Equipment: Personal equipment that may assist in preventing workplace violence.

An example of personal protective equipment could be safety toe shoes to prevent injuries resulting

from stomping.

Specific hazards will be identified and methods and means by which the school district shall address each specific hazard will be identified and assigned control measures consistent with the above using the tool at *Appendix 3*.

Reporting

The McGraw Central School District has created a reporting system that allows employees to report any workplace violence incidents that occur in the workplace. These reports will be in writing and will be maintained for the annual program review with the Authorized Employee Representative(s). The reporting system includes a Workplace Violence Incident Reporting Form.

At a minimum, the Workplace Violence Incident Reporting Form will contain the following:

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

The McGraw Central School District's Workplace Violence Incident Reporting form can be found at *Appendix 5*.

Any employee or their Authorized Employee Representative who believes a serious violation of the employer's workplace violence protection program exists, or that a workplace violence Imminent Danger exists, shall bring such matter to the attention of their supervisor and report the incident via the school district's Workplace Violence Incident Reporting Form and the school district shall have a reasonable opportunity to correct such activity, policy or practice.

Written notice is not required where workplace violence Imminent Danger exists to the safety of a specific employee and the employee reasonably believes in good faith that reporting to a supervisor would not result in corrective action.

Employee Training

Training will be provided at the time of the employee's initial onboarding and annually thereafter. Information will be provided to affected employees whenever significant changes are made to this program.

At a minimum, Employee training shall include the following:

1. The requirements of the workplace violence regulations and the risk factors that were identified in the risk evaluation and determination;
2. Measures that 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, emergency procedures, and the use of security alarms and other devices;
3. The location of the written workplace violence prevention program and how to obtain a copy.

The School District's training outline can be found at *Appendix 4*.

Program Review

The McGraw Central School District will review and update its Workplace Violence Prevention Program on an annual basis with the Authorized Employee Representative(s). The review will include an assessment of the program's effectiveness and any necessary modifications.

Confidentiality and Privacy Concern Cases

Confidentiality

The school district shall consider safety and security before considering disclosure of information related to workplace violence prevention. Examples of circumstances in which safety and security may preclude disclosure includes, but is not limited to, disclosure that 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.

Privacy Concern Case

If a report is deemed a "privacy concern case," by the school district, the school district shall 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 may include cases involving:

1. Injury or illness to an intimate body part or the reproductive system;
2. Injury or illness resulting from a sexual assault;
3. Mental illness;
4. HIV infection
5. 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
6. Other injuries or illnesses, if the employee independently and voluntarily requests that his or her name not be entered on the report.

Conclusion

The McGraw Central School District Workplace Violence Prevention Program is designed to create a safe and healthy work environment for all employees. The program is based on the understanding that workplace violence is a serious problem that can be prevented. By working together, the McGraw Central School District and its employees can create a workplace where everyone feels safe and respected.



Appendix 1

District Policy Statement

Board Policy #6191

SUBJECT: WORKPLACE VIOLENCE PREVENTION POLICY STATEMENT

McGraw Central School District is committed to the safety and security of our employees. Workplace violence presents a serious occupational safety hazard to our agency, staff, and clients.

Workplace Violence is defined as any physical assault or act 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 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; or 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.

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 authorities when warranted. All employees are responsible for helping to create an environment of mutual respect for each other as well as clients and visitors, following all policies, procedures and practices, and for assisting in maintaining a safe and secure work environment.

This policy is designed to meet the requirements of New York State Labor Law Art. 2 §27-b and highlights some of the elements that are found within our Workplace Violence Prevention Program. The process involved in complying with this law includes a workplace evaluation that is designed to identify the risks of workplace violence to which our employees could be exposed. Authorized Employee Representative(s) will, at a minimum, be involved in: evaluating the physical environment; developing the Workplace Violence Prevention Program; and reviewing workplace violence incident reports at least annually to identify trends in the types of incidents reported, if any, and reviewing the effectiveness of the mitigating actions taken.

All employees will participate in the annual Workplace Violence Prevention Training Program. 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. All personnel are responsible for notifying the contact person designated below of any violent incidents, threatening behavior, including threats they have witnessed, received, or have been told that another person has witnessed or received.

Designated Contact Person: Troy Bilodeau
Title: Assistant Superintendent of Business and Instruction
Department: Administration
Phone: (607)836-3640
E-mail: tbilodeau@mcgrawschools.org

Adoption Date: January 4, 2024



Appendix 2-A Records Examination March 2024

Instructions: Examine records below from the previous year to identify patterns, if any, of injuries in particular areas of the workplace or incidents which involve specific operations or specific individuals. Record the results in the column to the right.	
Record Examination	Results of the Examination
a. Log of Work Related Injuries and Illnesses (Form SH900) b. Summary of Work Related Injuries and Illnesses (Form SH900.1) c. Injury and Illness Incident Report (Form SH900.2)	
Workplace Violence Incident Reports	
Personnel Disciplinary Reports	
Workers' Compensation Reports	



Appendix 2-B

Assessment of Relevant Policies, Practices, and Procedures

March 2024

Instructions: Conduct an assessment of policies, work practices and procedures that may impact the risk of workplace violence.	
	Record the results of the assessment and any associated risks below.
<p>Examples of Relevant Policies: Domestic Violence Sexual Harassment Visitation Policies Policies for staff in field travel assignments (daily check-in procedures, itineraries, cell phones provided, etc.)</p> <p>Examples of Work Practices and Procedures: Visitor/Client sign in/out Escorting visitor(s)/client(s) One client entrance used Desks clear of objects which may become weapons (might be relevant in situations where dealing with the public) ID Badges used Itineraries with employee contact information Visitor check-in procedures After-hours contact procedures Procedure on how to control/defuse potentially violent situations Supplied with personal alarm/cellular phone/radio Limit visible clues of carrying money/valuables Partnering arrangements if necessary</p>	



Appendix 3
List of Risks and Mitigation Efforts
March 2024

Risks Identified through Record Review and/or Risk Evaluation	Methods and means by which the risk is being addressed
Identified Risk # ____	
Identified Risk # ____	
Identified Risk # ____	
Identified Risk # ____	
Identified Risk # ____	
Identified Risk # ____	
Identified Risk # ____	



Appendix 4

Workplace Violence Prevention Training Outline

March 2024

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 about the employer’s workplace violence prevention program goals and objectives and provide for full employee participation 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 examine their workplace to determine if existing or potential hazards exist that might place employees at risk of occupational assaults or homicides.
 - C. Develop a workplace violence prevention program – employers must develop a program, with input from employees or an authorized employee representative, that, among other things, includes the following: 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 occur in the workplace; a written outline or lesson plan for employee program trainings; 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. Other policies in place that may be relevant
 - A. Domestic Violence
 - B. Firearms
- III. Risk factors specific to the workplace that were identified in the risk evaluation
 - A. Findings
 - i. Elementary School
 1. Doors should be locked on staff days.
 2. Walkie-talkies should be utilized for all outdoor activities.
 3. Money should be locked in the vault.
 4. Doors are left unlocked and unmanned during after school events.
 - ii. High School
 1. There are currently no panic buttons in the building
 2. Current PA system cannot be heard in all building locations
 - a. Consider a flashing alert for notifications in loud areas (cafeteria, gymnasium)
 3. Need crowd control support for large events
 4. One point of egress from bathrooms
 - iii. Transportation Facility
 1. Doors are left unlocked when buses are out
 2. Periodic staffing

- B. Measures that employees can take to protect themselves from the identified risks including specific procedures that the employer has implemented such as:
 - i. Incident alert and notification procedures
 - ii. Appropriate work practices
 - iii. Emergency procedures
 - iv. Use of security alarms and other devices
 - C. Procedures to report incidents of workplace violence
 - D. Location of the written workplace violence prevention program and how to obtain a copy
- IV. Privacy Concerns
- A. How will sensitive information be handled?

Note: 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.



Appendix 5 Workplace Violence Incident Report

1. Date of Incident:	
2. Time of day/shift when the incident occurred:	
3. Name (Print):	Signature:
4. Workplace location where incident occurred:	
5. Provide a detailed description of the incident below. <i>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 illness, if the employee independently and voluntarily requests that his or her name not be entered on the report.</i>	
6. Description <i>Include: name of employee reporting the incident (unless a "privacy concern case"); names and job titles of involved employees; name or other identifier of other individuals involved; nature and extent of injuries arising from the incident; names of witnesses; and events leading up to the incident and how the incident ended.</i>	
7. Summary of Debriefing Meeting and/or De-escalation Measures	

Additional documentation attached