



COLUMBIA COUNTY
WORKPLACE VIOLENCE PREVENTION PROGRAM

Effective July 2013

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POLICY STATEMENT

The County of Columbia is committed to the safety and security of our employees. Workplace violence presents a serious occupational safety hazard to our agency, staff, and clients. Threats, threatening behavior, or acts of violence against employees, visitors, guests, or other individuals by anyone on County of Columbia property will be thoroughly investigated and appropriate action will be taken, including summoning criminal justice authorities when warranted. All employees are responsible for helping to create an environment of mutual respect for each other as well as clients, following all policies, procedures and program requirements, and for assisting in maintaining a safe and secure work environment.

The County of Columbia has designed the following Workplace Violence Prevention Program (hereinafter "WVPP"), which is designed to meet the requirements of New York State Labor Law regulation 12 NYCRR Part 800.6. The regulations are based on the requirements as set out in Section 27-b. Part 800.6 and Section 27-b are attached as Exhibit A. The WVPP will be reviewed and updated, if necessary, at least on an annual basis. On **July 10, 2013**, the County also passed an updated Workplace Violence Prevention Policy Statement and it is incorporated herein as Appendix B. The Workplace Violence Prevention Policy Statement will be posted in a conspicuous location where notices to employees are normally posted.

RISK ASSESSMENT

On March 27, 2013, Columbia County completed the risk assessment portion of the WVPP. In order to comply with the law, the County distributed an Exposure Assessment and Risk Determination Survey (hereinafter "Survey"), reviewed relevant records, and performed a walking inspection of each worksite. Management and Union Representatives had and will continue to have an ongoing role in the evaluation process, including recommending methods to reduce or eliminate the hazards identified during the process and investigating workplace violence incidents or allegations. All employees will participate in annual Workplace Violence Prevention training. Additionally, the Workplace Violence Prevention Program will be reviewed and updated annually.

Workplace Exposure Assessment and Risk Determination

The County, under the direction of Towne, Ryan & Partners, P.C. distributed Surveys to each Department Head in order to identify the workplace violence hazards to which County employees could be potentially exposed. The County, with the participation of Union representatives where applicable, discussed these risks in small group settings to assess work practices and work procedures that may impact the risk of workplace violence and to identify where improvements could be made. A blank Survey is attached as Appendix C. The completed Surveys are on file with the Human Resources Department along with sign-in sheets indicating who attended each meeting.

Records Review

The County also reviewed the following records to the extent available:

- Incident Reports;
- Log of Work Related Injuries and Illnesses Form (SH 900 forms);
- Training guides;
- Training presentations;
- Incident Reporting Procedures/Forms;
- Job Descriptions; and
- Relevant policies, work practices, and work procedures that may impact the risk of workplace violence.

From these records, the County has identified the following issues that need to be addressed:

- Many employees have not received workplace violence prevention training.
- The Workplace Violence Prevention Policy was not well-distributed previously.
- Incident Reporting Procedures although circulated and implemented in some Departments have not been well-circulated in other Departments throughout the County.
- Incident logs although used by some Departments were not being used consistently throughout the County.

The WVPP will adhere to the following hierarchy of controls, when possible:

- Engineering controls;
- Work practice controls; and
- Personal protective equipment.

Workplace Security Inspection

The County is creating a Workplace Violence Prevention Committee to ensure the continued review and assessment of potential threats and actual occurrences of workplace violence. The Committee will consist of ten (10) individuals that will have a representative of each of the eight (8) physical building locations along with two (2) floating members which will be filled by a County Legislator and Union representative. Members of the Committee shall serve for a term of up to two (2) years with the exception of the Human Resources Department which will always have a continuing member on the Committee at all times.

Nothing precludes a building representative from also being a union representative as additional union representation is encouraged and desired. The Workplace Violence Prevention Committee will meet on a quarterly basis on a date and time determined by Human Resources. Prior to each meeting, the building representatives will conduct inspections of the individual buildings and bring all concerns and/or issues to the quarterly meetings for review and consideration.

To date, the County has performed a walking inspection of each building with the assistance and input of department heads and union representatives. The issues identified from the inspections are identified in the chart below.

Risk Factors

The County of Columbia, through its representatives, held focus groups with Department Heads and Union Representatives to review the provisions of the law and discuss potential risk factors that exist in the individual work locations. The focus groups discussed the tasks of County employees to determine the presence of hazards, conditions, operations, and situations which might place workers at risk of occupational assault incidents.

The following factors were considered:

- Working in public settings
- Working late at night or early in the morning
- Exchange of money with the public
- Working alone or in small numbers
- Working in a location with uncontrolled public access to the workplace
- Areas with previous security problems

The completed Surveys are available for review at the Human Resources Department, however, the following provides an overview of examples of risk factors that have been identified by the various Department:

Department	Location	Risk Factors
Fire Coordinator	85 Industrial Tract, Hudson	<ul style="list-style-type: none"> • work 24/7 • work alone and/or in small numbers;
Coroner's Office & Emergency Management	85 Industrial Tract, Hudson	<ul style="list-style-type: none"> • work 24/7 • work alone and/or in small numbers • have to secure money or property of deceased until it is turned over to next of kin
Sheriff's Department, Civilian	85 Industrial Tract, Hudson	<ul style="list-style-type: none"> • work in small numbers • direct contact with the public • some exchange of money
Sheriff's Department, Road Patrol	85 Industrial Tract, Hudson	<ul style="list-style-type: none"> • work 24/7 • work alone and/or in small numbers • direct contact with the public
Sheriff's Department, Security Services	Columbia County Courthouse	<ul style="list-style-type: none"> • direct contact with the public
Sheriff's Department, Satellite Location	2684 NYS Route 23, Hillsdale	<ul style="list-style-type: none"> • work 24/7 • direct contact with the public
Sheriff's Department, Corrections	85 Industrial Tract, Hudson	<ul style="list-style-type: none"> • work 24/7 • direct contact with inmates

		<ul style="list-style-type: none"> • some exchange of money during inmate intake
911	85 Industrial Tract, Hudson	<ul style="list-style-type: none"> • work 24/7 • work alone and/or in small numbers (from 10pm – 7am) • direct contact with the public
Department of Social Services	25 Railroad Avenue, Hudson	<ul style="list-style-type: none"> • work alone and/or in small numbers • sometimes work at night • on-call after hours • direct contact with the public, including felons, parolees, sex offenders, individuals with mental health issues and/or alcohol/substance abuse problems • some exchange of money • perform home visits/on-call services
Tourism, Planning & Economic Development	401 State Street, 3rd Floor, Hudson	<ul style="list-style-type: none"> • unsecured building entrance easily accessible to the public • high-crime/drug area • work alone or in small numbers
Elections	401 State Street, Hudson	<ul style="list-style-type: none"> • unsecured building entrance easily accessible to the public • high crime/drug area • work alone and/or in small numbers • work late at night during elections • direct contact with the public during elections
Payroll	401 State Street, 3rd Floor, Hudson	<ul style="list-style-type: none"> • unsecured building entrance easily accessible to the public • high-crime/drug area • work alone and/or in small numbers • encounter disgruntled employees sometimes
Veterans	401 State Street, Hudson	<ul style="list-style-type: none"> • unsecured building entrance easily accessible to the public • high-crime/drug area • work alone and/or in small numbers
County Attorney's Office	401 State Street, Hudson	<ul style="list-style-type: none"> • unsecured building entrance easily accessible to the public • high crime/drug area • work in small numbers
Controller	401 State Street, Hudson	<ul style="list-style-type: none"> • unsecured building entrance easily accessible to the public • high crime/drug area • work in small numbers

Clerk of the Board	401 State Street, Hudson	<ul style="list-style-type: none"> • unsecured building entrance easily accessible to the public • high crime/drug area • work alone • some evening meetings
Civil Service	401 State Street, Hudson	<ul style="list-style-type: none"> • unsecured building entrance easily accessible to the public • high crime/drug area • work in small numbers • direct contact with the public
Youth	401 State Street, Hudson	<ul style="list-style-type: none"> • unsecured building entrance easily accessible to the public • high crime/drug area • work alone or in small numbers • direct contact with members of the public • some evening meetings
Central Services	401 State Street, Hudson	<ul style="list-style-type: none"> • unsecured building entrance easily accessible to the public • high crime/drug area
Office of the Aging	325 Columbia Street, 2nd Floor, Hudson	<ul style="list-style-type: none"> • high crime/drug area • in close proximity to mental health clinic • occasionally encounter irritated individuals looking for assistance (usually looking for a different agency)
Mental Health Department/Department of Human Services	325 Columbia Street, Hudson	<ul style="list-style-type: none"> • high crime/drug area • work with mental health patients • work some evenings • some exchange of money • transportation of clients is one-on-one and home visits pose some risk of violence
Health Department	325 Columbia Street, Hudson	<ul style="list-style-type: none"> • high crime/drug area • work with mental health patients • work late at night or nights/weekends/holidays • work alone on weekends/holidays • some exchange of money • home visits pose some risk of violence
District Attorney	325 Columbia Street, Hudson	<ul style="list-style-type: none"> • high crime/drug area • work before/after regular business hours • work in the evenings (night court) • direct contact with the public
Conflict Defenders	N/A	<ul style="list-style-type: none"> • sometimes work in high-crime areas • work in the evenings (night court) • direct contact with the public

Sealer of Weights & Measures	N/A	<ul style="list-style-type: none"> works alone and mostly out of vehicle works in public settings high crime/drug areas, sometimes works in rural settings, sometimes
Historian	610 State Street, Hudson	<ul style="list-style-type: none"> works alone building easily accessible to the public
Probation and Public Defender	610 State Street, Hudson	<ul style="list-style-type: none"> exchange of money dealing with restitution and reparations Town and Village courts take place in the evenings some home visits home visits to sex offenders on Halloween parking lot is fenced in, which some have complained about high-crime/drug area
Real Property and County Clerk	560 Warren Street, Hudson	<ul style="list-style-type: none"> unsecured building is easily accessible to the public large amount of cash on hand (County Clerk) work in small numbers
Managed Information Services	560 Warren Street, Hudson	<ul style="list-style-type: none"> work alone unsecured building is easily accessible to the public
Treasurer	15 N. 6 th Street, Hudson	<ul style="list-style-type: none"> minimal direct contact with the public exchange of money (cash and checks)
Department of Public Works, Highway and Engineering	Various Locations	<ul style="list-style-type: none"> unsecured building is easily accessible to the public work alone or in small numbers
Facilities		<ul style="list-style-type: none">
Pine Haven Nursing Home	201 Main Street, Philmont	<ul style="list-style-type: none"> work 24/7 some exchange of money because they manage resident's financial accounts unsecured building entrance easily accessible to the public (8 am-8 pm)

Workplace Hazard Control and Prevention

In order to reduce the risk of workplace violence, the following are examples of measures that have already been undertaken by the County and/or implemented in the respective Departments:

Department	Location	Methods Currently Being Utilized
Fire Coordinator	85 Industrial Tract, Hudson	<ul style="list-style-type: none"> building access controlled with key FOB evacuation plans in place controlled access of building 24/7

		<ul style="list-style-type: none"> • public safety committee has been established • signs posted limiting access to authorized personnel only
Coroner's Office, Emergency Management	85 Industrial Tract, Hudson	<ul style="list-style-type: none"> • building access controlled with key FOB • evacuation plans in place • controlled access of building 24/7 • employee assistance program
Sheriff's Department, Civilian	85 Industrial Tract, Hudson	<ul style="list-style-type: none"> • video surveillance • building access controlled with key FOB • evacuation plans in place • controlled access of building 24/7 • glass divider between public and employees
Sheriff's Department, Road Patrol	85 Industrial Tract, Hudson	<ul style="list-style-type: none"> • workplace violence training • defensive tactics training • workplace violence training
Sheriff's Department, Security Services	Columbia County Courthouse	<ul style="list-style-type: none"> • building access controlled with key • workplace violence training • metal detectors used
Sheriff's Department, Satellite Location	2684 NYS Route 23, Hillsdale	<ul style="list-style-type: none"> • video surveillance • workplace violence training • well-lit exterior of building
Sheriff's Department, Corrections	85 Industrial Tract, Hudson	<ul style="list-style-type: none"> • video surveillance • workplace violence training • evacuation plans in place • sign-in and sign-out sheets to account for individuals • ability to lock-down entrances/exits from a centralized location • ability to search visitors • metal detectors for visitors
911	85 Industrial Tract, Hudson	<ul style="list-style-type: none"> • video surveillance • evacuation plans in place • secured building • emergency management plans in place
Department of Social Services	25 Railroad Avenue, Hudson	<ul style="list-style-type: none"> • safety committee that meets monthly • workplace violence training • incident reporting procedures • evacuation plans in place • locked door between publicly accessed portions of building and the rest of building • adopted and circulated safety manual

		<ul style="list-style-type: none"> • sign-out sheets to account for employees working in the field • de-escalation training • self-defense training • Deputy Sheriff sweeps building randomly throughout the day • buzzer or keypad for entry into controlled areas
Tourism, Planning & Economic Development	401 State Street, Hudson	<ul style="list-style-type: none"> • doors locked after working hours • video surveillance
Elections	401 State Street, Hudson	<ul style="list-style-type: none"> • employees receive training on conflict resolution • building is secured after working hours • doors locked after working hours
Payroll	401 State Street, 3rd Floor, Hudson	<ul style="list-style-type: none"> • video surveillance • doors locked after working hours
Veterans	401 State Street, Hudson	<ul style="list-style-type: none"> • video surveillance • doors locked after working hours
County Attorney's Office	401 State Street, Hudson	<ul style="list-style-type: none"> • door to office is secured by code entry • utilize two-way mirror on office door • staff procedures exist for dealing with threats
Controller	401 State Street, Hudson	<ul style="list-style-type: none"> • video surveillance • doors locked after working hours
Clerk of the Board	401 State Street, Hudson	<ul style="list-style-type: none"> • video surveillance • doors locked after working hours
Civil Service	401 State Street, Hudson	<ul style="list-style-type: none"> • video surveillance • doors locked after working hours
Youth	401 State Street, Hudson	<ul style="list-style-type: none"> • some conflict training provided • video surveillance • doors locked after working hours
Central Services	401 State Street, Hudson	<ul style="list-style-type: none"> • exterior of building is well-lit • doors locked after working hours
Office of the Aging	325 Columbia Street, Hudson	<ul style="list-style-type: none"> • access controlled by key FOBs • fire drills done quarterly • building-wide emergency plan drafted • emergency/contact numbers on file • Deputy Sheriff at entrance • visitor sign-in and visitor pass system • office space is locked
Mental Health Department/Department of	325 Columbia Street, 3rd Floor,	<ul style="list-style-type: none"> • access controlled by key FOBs • fire drills done quarterly

Human Services	Hudson	<ul style="list-style-type: none"> • building-wide emergency plan drafted • emergency/contact numbers on file • Deputy Sheriff at entrance • visitor sign-in and visitor pass system • office space is locked • incident reporting procedures in place • workplace violence training for staff members
Health Department	325 Columbia Street, Hudson	<ul style="list-style-type: none"> • access controlled by key FOBs • fire drills done quarterly • building-wide emergency plan drafted • emergency/contact numbers on file • Deputy Sheriff at entrance • visitor sign-in and visitor pass system • office space is locked
District Attorney	325 Columbia Street, Hudson	<ul style="list-style-type: none"> • access controlled by key FOBs • fire drills done quarterly • building-wide emergency plan drafted • emergency/contact numbers on file • Deputy Sheriff at entrance • visitor sign-in and visitor pass system • office space is locked • courthouses are secured locations • bulletproof glass at entrance of DA's office • locked entrance with "guard" at entrance of DA's office
Conflict Defenders	N/A	<ul style="list-style-type: none"> • work in public locations • video surveillance on some locations
Historian	610 State Street, Hudson	<ul style="list-style-type: none"> • locks office door when in office • works from home mostly
Probation and Public Defender	610 State Street, Hudson	<ul style="list-style-type: none"> • armed officer from the Sheriff's department stays in the lobby and sweeps the 2nd floor periodically • visitors are always escorted through the building • full-building evacuation drill performed last year • sign in/sign out sheet to know who is in the office at the time • peace officers are trained in defensive tactics and to have "situational awareness"
Real Property and County	560 Warren	<ul style="list-style-type: none"> • tellers have panic buttons

Clerk	Street, Hudson	<ul style="list-style-type: none"> • Deputy Sheriff present during hours when building is open • Deputy Sheriff will escort someone from County Clerk's office to make deposits • Deputy Sheriff will patrol parking lots • security alarm in place
Managed Information Services	560 Warren Street, Hudson	<ul style="list-style-type: none"> • Deputy Sheriff present during hours when building is open
Solid Waste	Various Locations	<ul style="list-style-type: none"> • dispatcher knows where every driver is • every truck has a radio • fire alarms are checked frequently
Treasurer	15 N. 6 th Street, Hudson	<ul style="list-style-type: none"> • employees have robbery training • office is equipped with two panic buttons • employees are able to call Deputy Sheriff from DMV to do a walk-through if they feel it is necessary • Deputy Sheriff escorts employees to make deposits
Department of Public Works, Highway and Engineering	Various Locations	<ul style="list-style-type: none"> • building-wide PA system • night watchman stays 24/hours a day • anyone coming for fuel must sign-in • doors lock at 4:30 p.m./5 p.m. every day
Facilities		<ul style="list-style-type: none"> •
Pine Haven Nursing Home	201 Main Street, Philmont	<ul style="list-style-type: none"> • subject to several state codes, including evacuation plans, fire drills, how to handle chemical spills, etc. • improved lighting in the parking lot • all employees receive in-service training, including workplace violence prevention • Village of Philmont police patrol the parking lot in the evenings and on the weekends • incidents are logged after each shift in a shift report • video surveillance

INCIDENT RESPONSE AND REPORTING

Guidelines for Incident Response

In an emergency situation involving actual or potential violence, the first priority is to protect the safety and well-being of persons involved. Because each situation involves unique factors, the following guidelines are intended to provide general guidance. The key elements are

safety, reporting, coordination, and control. The following procedures should be followed when dealing with an angry customer or member of the public:

- A. Attempt to de-escalate the situation as soon as the customer (citizen) shows signs of anxiety. Through verbal and non-verbal skills, attempt to be supportive and helpful.
- B. If the situation does not de-escalate, then firm but respectful direction must be given.
 - a. Take away the person's audience by removing the individual to an area where there is less public involvement in the situation.
 - b. Allow the person to vent some anger. Be helpful and supportive. Do not presume the person is at fault.
 - c. Set limits for the customer. Provide the customer with direction by giving clear choices and consequences.
- C. If the situation continues to escalate and violence or threats of violence occur, immediately call the emergency number (911) and report as many details as possible.
- D. An employee who is involved in, or who witnesses a violent incident, shall immediately notify a supervisor or Department Head.

The Department Head or another department management representative shall contact the Board of Supervisors and/or appropriate governing body who shall perform the investigation of the incident, and assist the Department Head in disciplinary action (if necessary).

- E. If a person enters your place of work using a weapon to carry out a physical attack, remove yourself from the area immediately.

Incident Reporting

Employees must and shall report all incidents of workplace violence as soon as possible and must complete an "Incident Report Form." The Incident Report Form is attached as Appendix D. One copy will be forwarded to the County Attorney's Office for their review and a copy will be sent to the Human Resources Department to be filed.

Each incident will be evaluated by the County Attorney's office and Human Resources Department. Upon review and if necessary, this Program will be revised accordingly. All revisions will be put into writing and made available to all employees as soon as possible thereafter.

Certain departments, specifically Department of Social Services, have separate incident reporting procedures. Department of Social Services incident reporting procedures are attached as Appendix E.

TRAINING AND EDUCATION

In addition to the above, all employees have or will be trained on the County's Workplace Violence Prevention Program with annual training thereafter. Training has been given according to the following schedule:

Training shall include:

- A review and definition of workplace violence;
- A full explanation and full description of our program (all employees are given a copy of this program at training);
- Instructions on how to report all incidents including threats and verbal abuse;
- Methods of recognizing and responding to workplace security hazards;
- Training on how to identify potential workplace security hazards (such as no lights in the parking lot while leaving late at night, unknown person loitering outside the building, etc.);
- Review of risk factors and measures that have been instituted;
- Use of security equipment and procedures;
- How to attempt to diffuse hostile or threatening situations;
- How to summon assistance in case of an emergency or hostage situation; and
- Post-incident procedures, including medical follow-up and the availability of counseling and referral

This training is conducted by County employees that have undergone specialized training necessary to successfully conduct such training. At the end of each training session, employees are asked to evaluate the session and make suggestions on how to improve the training. A copy of the current Workplace Violence Prevention Presentation is available upon request.

Additionally, a further training module will be given to employees who work out in the field with the public as part of their duties. This will include such departments as DSS, Mental Health, DOH, District Attorney, Conflict Defender, Probation, and Public Defender. A copy is available upon request. The Sheriff's Department also has training developed with a focus specific to corrections and law enforcement. This training will be used in conjunction with County trainings. A copy is available upon request.

Workplace violence prevention training will be given to new employees as part of their orientation. A general review of this program will be conducted annually. The County's training program will be updated as necessary to reflect changes in our Workplace Violence Prevention Program. All training records are filed with the Human Resources Department.

RECORDKEEPING

Columbia County will maintain an accurate record of all workplace violence incidents. All incident report forms will be kept for a minimum of five (5) years, or for the time specified by statute.

Any injury which requires more than minor first aid, is a lost-time injury, requires modified duty, or causes loss of consciousness, will be recorded on the OSHA-PESH 900 log. Doctor's reports and supervisors' reports will be kept of each recorded incident, if applicable.

Incidents of abuse, verbal attack, or aggressive behavior, which may be threatening to the employee, but not resulting in injury, will be recorded. These records will be evaluated on a regular basis by the the Human Resources Department in conjunction with the Workplace Violence Prevention Committee.

Records of training program contents and sign-in sheets of all attendees shall be kept for five (5) years.

ACKNOWLEDGMENT FORM

I acknowledge that I have received a copy of the County of Columbia's Workplace Violence Prevention Policy and Incident Reporting system. I agree that I have read the policy thoroughly and agree to abide by such policy. Further, I agree that if there is any provision that I do not understand, I will seek clarification from the Department Head or Human Resources Department.

Date: _____

Signature: _____

Print Name: _____

APPENDIX A

12 NYCRR PART 800.6

PUBLIC EMPLOYER WORKPLACE VIOLENCE PREVENTION PROGRAMS

800.6

(a) Title and Citation: Within and for the purposes of the Department of Labor, this part may be known as Code Rule 800.6, Public Employer Workplace Violence Prevention Programs, relating to requirements of public employers to develop and implement programs to prevent and minimize the hazards of workplace violence to public employees; allowing any employee or authorized employee representative of employees who believes that a serious violation of this safety or health standard exists, or an imminent danger exists, to request an inspection by the department of labor; and providing for the enforcement of such requirement by the Commissioner of Labor. It may be cited as Code Rule 800.6“Public Employer Workplace Violence Prevention Programs” as an alternative and without prejudice to its designation and citation established by the Secretary of State.

(b) Purpose and Intent: It is the purpose of this part to ensure that the risk of workplace assaults and homicides is evaluated by affected public employers and their employees and that such public employers design and implement protection programs to minimize the hazard of workplace violence to employees.

(c) Application: This part shall apply throughout the State of New York to the State, any political subdivision of the state, any public authority, public benefit corporation or any other governmental agency or instrumentality thereof.

This part shall not apply to any employer as defined in Section twenty-eight hundred one-a of the Education Law.

(d) Terms: As used in or in connection with this part, the following terms mean:

(1) 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.

(2) Commissioner. The Commissioner of Labor of the State of New York or his or her duly authorized representative for the purposes of implementing this Part.

(3) Employee. A public employee working for an employer.

(4) Employer. The State, any political subdivision of the State, any public authority public benefit corporation, and any other governmental agency or instrumentality thereof, except that an employer shall not include, for purposes of this part, any employer defined as such in Section twenty-eight hundred one-a (2801a) of the Education Law.

(5) 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 through the enforcement procedures otherwise provided for by this Part.

(6) Retaliatory Action. 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.

(7) 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 Penal Law.

(8) Serious Violation: A serious violation of the public employer workplace violence prevention program (WVPP) is the failure to:

(a) Develop and implement a program.

(b) Address situations which could result in serious physical harm.

(9) Supervisor. Any person within the employer's organization 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.

(10) Workplace. Any location away from an employee's domicile, permanent or temporary, where an employee performs any work-related duty in the course of his or her employment by an employer.

(11) Workplace Violence. 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:

(i) An attempt or threat, whether verbal or physical, to inflict physical injury upon an employee;

(ii) Any intentional display of force which would give an employee reason to fear or expect bodily harm;

(iii) Intentional and wrongful physical contact with a person without his or her consent that entails some injury;

(iv) 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.

(12) Workplace Violence Prevention Program. An employer program designed to prevent, minimize and respond to any workplace violence, the development and implementation of which is required by Article 2, Section 27-b of the New York State Labor Law.

(e) Management Commitment and Employee Involvement

(1) Workplace Violence Policy Statement:

The employer shall develop and implement a written policy statement on the employer's workplace violence prevention program goals and objectives and provide for full employee participation through an authorized employee representative.

(i) The workplace violence policy statement shall be posted where notices to employees are normally posted.

(ii) The policy statement shall briefly indicate the employer's workplace violence prevention policy and incident alert and notification policies for employees to follow in the event of a workplace violence incident.

(2) The responsibility and authority for preparing, determining the content of and implementing the requirements of this part remains with the employer. Local governments and all other public employers may elect to share resources in the development and implementation of their workplace violence prevention programs.

(f) Risk Evaluation and Determination

(1) Record Examination:

The employer shall examine any records relevant to the purposes of this Part in its possession, including records compiled in the previous year under Labor Law Section 27a, that concern workplace violence incidents to identify patterns in the type and cause of injuries. The examination shall look to identify patterns of injuries

in particular areas of the workplace or incidents which involve specific operations or specific individuals.

(2) Administrative Risk Factors

The employer shall assess relevant policies, work practices, and work procedures that may impact the risk of workplace violence.

(3) Evaluation of Physical Environment

The employer, with the participation of the authorized employee representatives, shall evaluate the workplace to determine the presence of factors which may place employees at risk of workplace violence. The Department of Labor has tools to aid employers in performing this evaluation which will be posted on the Department's web-site.

Factors which might place an employee at risk include but are not limited to:

- (i) Working in public settings (e.g. Social Service Workers, Police Officers, Firefighters, Teachers, Public Transportation Drivers, Health Care Workers, other Governmental Workers or Service Workers);
- (ii) Working late night or early morning hours;
- (iii) Exchanging money with the public;
- (iv) Working alone or in small numbers;
- (v) Working in a location with uncontrolled public access to the workplace; or
- (vi) Areas of previous security problems.

(g) The Workplace Violence Prevention Program

(1) Employers with 20 or more full time permanent employees, with the participation of the authorized employee representative, shall develop a written workplace violence prevention program. Such participation shall include soliciting input from the authorized employee representative as to those situations in the workplace that pose a threat of workplace violence, and on the workplace violence prevention program the employer intends to implement under these regulations.

Safety and health programs developed and implemented to meet other federal, state or local regulations, laws or ordinances are considered acceptable in meeting this requirement if those programs cover or are modified to cover the topics required in this paragraph. An additional or separate safety and health program is not required by this paragraph.

(2) The workplace violence prevention program shall include the following:

(i) A list of the risk factors identified in the workplace examination;

(ii) The methods the employer will use to prevent the incidence of workplace violence incidents;

(iii) A hierarchy of controls to which the program shall adhere as follows:

engineering controls, work practice controls, and finally personal protective equipment;

- (iv) The methods and means by which the employer shall address each specific hazard identified in the workplace evaluation;
- (v) A system designed and implemented by the employer to report any workplace violence incidents that occur in the workplace. The reports must be in writing and maintained for the annual program review;
- (vi) A written outline or lesson plan for employee program training;
- (vii) A plan for program review and update on at least an annual basis. Such review and update shall set forth any mitigating steps taken in response to any incident of workplace violence.
- (viii) Nothing in this part shall require the disclosure of information otherwise kept confidential for security reasons. Such information may include information which, if disclosed:
 - (a) Would interfere with law enforcement investigations or judicial proceedings;
 - (b) Would deprive a person of a right to a fair trial or impartial adjudication;
 - (c) Would identify a confidential source or disclose confidential information relating to a criminal investigation;
 - (d) Would reveal criminal investigative techniques or procedures, except routine techniques and procedures; or
 - (e) Would endanger the life or safety of any person.
- (h) Employee Information and Training

(1) Upon completion of the workplace violence prevention program, every employer shall provide each employee with information and training on the risks of workplace violence in their workplace or workplaces at the time of the employee's initial assignment and at least annually thereafter.

Such information as necessary shall be provided to affected employees whenever significant changes are made to the workplace violence program. At a minimum training shall address the following:

(i) Employers shall inform employees of the requirements of this Part and the risk factors in their workplace that were identified in the risk evaluation and determination, except that nothing in this part shall require the disclosure of the information otherwise kept confidential for security reasons as identified in paragraph (g)(2)(viii).

(ii) Employers shall inform employees of the 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 use of security alarms and other devices;

(iii) Employers with 20 or more full-time permanent employees shall inform employees of the location of the written workplace violence program and how to obtain a copy, and shall make it available for reference to employees, authorized

employee representatives and the Commissioner in the work area during the regularly scheduled shift.

(i) Recordkeeping and Recording Of Workplace Violence Incidents

(1) Employers shall establish and implement reporting systems for incidents of workplace violence.

Reporting systems developed and implemented to meet other federal state or local regulations, laws or ordinances are considered acceptable in meeting this requirement if they cover or are modified to cover the information required in this paragraph. An additional or separate reporting system is not required by this paragraph.

(2) Employers at sites where there is a developing pattern of workplace violence incidents which may involve criminal conduct or a serious injury shall attempt to develop a protocol with the District

Attorney or Police to insure that violent crimes committed against employees in the workplace are promptly investigated and appropriately prosecuted. The employer shall provide information on such protocols and contact information to employees who wish to file a criminal complaint after a workplace violence incident.

(3) Systems for reporting instances of workplace violence.

(i) The employer shall develop and maintain a Workplace Violence Incident Report that can be in any format but, at a minimum, shall contain the following relating to the incident being reported:

- (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.

(ii)

(a) If the case is a “privacy concern case” as defined below, the employer shall still be liable for developing a Workplace Violence Incident Report as set forth above.

However, before sharing a copy of such Report with any party other than the Commissioner, the employer shall remove the name of the employee who was the victim of the workplace violence and shall instead enter “PRIVACY CONCERN CASE” in the space normally used for the employee’s name.

(b) The employer shall treat incidents involving the following injuries or illnesses as privacy concern cases:

- (1) An injury or illness to an intimate body part or the reproductive system;
- (2) An 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.

(4) The Workplace Violence Incident Report must be maintained for use in annual program review and updates. This requirement does not relieve an employer of the recordkeeping requirements of 12NYCRR Part 801.

(5) The employer, with the participation of the authorized employee representative, shall 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.

(j) Employee Reporting Of Workplace Violence Prevention Concerns or Incidents

(1) Any employee or his or her authorized employee representative who believes that 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 a supervisor in the form of a written notice and shall afford the employer a reasonable opportunity to correct such activity, policy or practice.

(2) Written notice to an employer shall not be required where workplace violence imminent danger exists to the safety of a specific employee or to the general health

of a specific patient and the employee reasonably believes in good faith that reporting to a supervisor would not result in corrective action.

(3) If, following a referral of such matter to the employee's supervisor and after a reasonable opportunity to correct such activity, policy or practice, the matter has not been resolved and the employee or the authorized employee representative still believes that a serious violation of a workplace violence prevention program remains or that an imminent danger exists, such employee may request an inspection by notifying the Commissioner of Labor of the alleged violation. Such notice and request shall be in writing, shall set forth with reasonable particularity the ground(s) for the notice and shall be signed by such employee or their authorized employee representative. A copy of the written notice shall be provided by the Commissioner to the employer or the person in charge no later than the time of inspection, except that at the request of the person giving such notice, such person's name and the names of individual employees or authorized employee representatives of employees shall be withheld. Such inspection shall be made forthwith by the Commissioner.

4) The authority of the Commissioner to inspect premises pursuant to such employee complaint shall not be limited to the alleged violation contained in such complaint. The Commissioner may inspect any other area of the premises in which he or she has reason to believe that a serious violation of this section exists.

(5) The Commissioner may, upon his or her own initiative, conduct an inspection of any premises occupied by an employer if he or she has reason to believe that a violation of this section has occurred.

The current PESH administrative plan will be used for the enforcement of this section, including a general schedule of inspections, which provides a rational administrative basis for such inspection.

(6) No employer shall take retaliatory action against any employee because the employee exercises any right accorded him or her by this Part.

(k) Effective Dates

(1) The Employer's Policy Statement required by section (e) of this Part shall be completed within 30 days after the effective date of this Part.

(2) The workplace risk evaluation and determination required by section (f) of this Part shall be completed within 60 days of the effective date of this Part.

(3) The workplace violence prevention program required by section (g) of this Part shall be complete within 75 days of the effective date of this Part.

(4) Employers shall be in compliance with the entire Part within 120 days of the effective date of this Part.

Labor Law Article 2

* § 27-b. Duty of public employers to develop and implement programs to prevent workplace violence. 1. Purpose. The purpose of this section is to ensure that the risk of workplace assaults and homicides is evaluated by affected public employers and their employees and that such employers design and implement workplace violence protection programs to prevent and minimize the hazard of workplace violence to public employees.

2. Definitions. For the purposes of this section:

a. "Employer" means: (1) the state; (2) a political subdivision of the state, provided, however that this subdivision shall not mean any employer as defined in section twenty-eight hundred one-a of the education law; and (3) a public authority, a public benefit corporation, or any other governmental agency or instrumentality thereof.

b. "Employee" means a public employee working for an employer.

c. "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 his or her employment by an employer.

d. "Supervisor" means any person within an employer's organization 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.

e. "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.

3. Risk evaluation and determination. Every employer shall evaluate its workplace or workplaces to determine the presence of factors or situations in such workplace or workplaces that might place employees at risk of occupational assaults and homicides. Examples of such factors shall include, but not limited to:

a. working in public settings (e.g., social services or other governmental workers, police officers, firefighters, teachers, public transportation drivers, health care workers, and service workers);

b. working late night or early morning hours;

c. exchanging money with the public;

d. working alone or in small numbers;

e. uncontrolled access to the workplace; and

f. areas of previous security problems.

4. Written workplace violence prevention program. Every employer with at least twenty full time permanent employees shall develop and implement a written workplace violence prevention program for its workplace or workplaces that includes the following:

a. a list of the risk factors identified in subdivision three of this section that are present in such workplace or workplaces;

b. the methods the employer will use to prevent incidents of occupational assaults and homicides at such workplace or workplaces, including but not limited to the following:

(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.

5. Employee information and training. a. Every employer with at least

twenty permanent full time employees shall make the written workplace violence prevention program available, upon request, to its employees, their designated representatives and the department.

b. Every employer shall provide its employees with the following information and training on the risks of occupational assaults and homicides in their workplace or workplaces at the time of their initial assignment and annually thereafter:

(1) employees shall be informed of the requirements of this section, the risk factors in their workplace or workplaces, and the location and availability of the written workplace violence prevention program required by this section; and

(2) employee training shall include at least: (a) the measures employees can take to protect themselves from such risks, including specific procedures the employer has implemented to protect employees, such as appropriate work practices, emergency procedures, use of security alarms and other devices, and (b) the details of the written workplace violence prevention program developed by the employer.

6. Application. a. Any employee or representative of employees who believes that a serious violation of a workplace violence protection program exists or that an imminent danger exists shall bring such matter to the attention of a supervisor in the form of a written notice and shall afford the employer a reasonable opportunity to correct such activity, policy or practice. This referral shall not apply where imminent danger or threat exists to the safety of a specific employee or to the general health of a specific patient and the employee reasonably believes in good faith that reporting to a supervisor would not result in corrective action.

b. If following a referral of such matter to the employee's supervisor's attention and after a reasonable opportunity to correct such activity, policy or practice the matter has not been resolved and the employee or representative of employees still believes that a violation of a workplace violence prevention program remains, or that an imminent danger exists, such employee or representative of employees may request an inspection by giving notice to the commissioner of such violation or danger. Such notice and request shall be in writing, shall set forth with reasonable particularity the grounds for the notice, shall be signed by such employee or representative of employees, and a copy shall be provided by the commissioner to the employer or the person in charge no later than the time of inspection, except that on the request of the person giving such notice, such person's name and the names of individual employees or representatives of employees shall be withheld. Such inspection shall be made forthwith.

c. A representative of the employer and an authorized employee representative shall be given the opportunity to accompany the commissioner during an inspection for the purpose of aiding such inspection. Where there is no authorized employee representative, the commissioner shall consult with a reasonable number of employees concerning matters of safety in the workplace.

d. The authority of the commissioner to inspect a premises pursuant to such an employee complaint shall not be limited to the alleged violation contained in such complaint. The commissioner may inspect any other area of the premises in which he or she has reason to believe that a serious violation of this section exists.

e. No employer shall take retaliatory action against any employee because the employee does any of the following:

- (1) makes an application pursuant to paragraph a of this subdivision;
- (2) requests an inspection as authorized in paragraph b of this subdivision;
- (3) accompanies the commissioner as authorized in paragraph c of this

subdivision;

f. The commissioner may, upon his or her own initiative, conduct an inspection of any premises occupied by an employer if he or she has reason to believe that a violation of this section has occurred or if he or she has a general administrative plan for the enforcement of this section, including a general schedule of inspections, which provide a rational administrative basis for such inspecting. Within one hundred twenty days of the effective date of this paragraph the commissioner shall adopt rules and regulations implementing the provisions of this section.

g. Any information obtained by the commissioner pursuant to this subdivision shall be obtained with a minimum burden upon the employers.

h. When a request for an inspection has been made in a situation where there is an allegation of an imminent danger such that an employee would be subjecting himself or herself to serious injury or death because of the hazardous condition in the workplace, the inspection shall be given the highest priority by the department and shall be carried out immediately.

* NB Effective March 4, 2007

APPENDIX B



Columbia County Workplace Violence Prevention Policy Statement

The County of Columbia is committed to the safety and security of our employees. Workplace violence presents a serious occupational safety hazard to our agency, staff, and clients. Threats, threatening behavior, or acts of violence against employees, visitors, guests, or other individuals by anyone on the County of Columbia property will be thoroughly investigated and appropriate action will be taken, including summoning criminal justice authorities when warranted. All employees are responsible for helping to create an environment of mutual respect for each other as well as clients, following all policies, procedures and program requirements, and for assisting in maintaining a safe and secure work environment.

This policy is designed to meet the requirements of NYS Labor Law 27b and highlights some of the elements that are found within our Workplace Violence Prevention Program. The process involved in complying with this law included a workplace evaluation that was designed to identify the workplace violence hazards our employees could be exposed to. Authorized Employee Representative(s) will, at a minimum, be involved in:

- The evaluation of the physical environment;
- The development of the Workplace Violence Prevention Program; and
- The review of 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.

Other tools that were utilized during this process included accident reports/DOSH 900 logs/assessments/surveys. Management and Authorized Employee Representatives will have an ongoing role in the evaluation process, recommending methods to reduce or eliminate the hazards identified during the process and investigating workplace violence incidents or allegations. 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. The County of Columbia has identified response personnel that include a member of management and an employee representative. If appropriate, the town will provide counseling services or referrals for employees.

All County of Columbia 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:

Name: Michaele Williams-Riordon
Title: Human Resources Director
Department: Columbia County Dept. of Human Resources
Phone: 518-828-4086
Location: 401 State Street, Hudson, New York 12534

APPENDIX C

COLUMBIA COUNTY GOVERNMENT
WORKPLACE VIOLENCE PREVENTION PROGRAM
EXPOSURE ASSESSMENT

Facility: _____

Name: _____

Location: _____

Department: _____

Division: _____

Contact Person: _____

RISK EVALUATION:

1. Please examine the following factors and describe to what extent such factors are present in your workplace.

a. Working in public settings (e.g. social services or other governmental workers, police officers, firefighters, teachers, public transportation drivers, health care workers, and service workers):

b. Working late night or early morning hours:

c. Exchanging money with the public:

d. Working alone or in small numbers:

e. Uncontrolled access to the workplace:

f. Areas of previous security problems:

2. I have evaluated the following records:

3. I have consulted with the following people:

RISK DETERMINATION

1. Please list the methods currently being utilized to prevent incidents of workplace violence (e.g. making high-risk areas more visible to more people; installing good external lighting; using drop safes or other methods to minimize cash on hand; posting signs stating that limited cash is on hand; providing training in conflict resolution and non violent self-defense responses; and establishing and implementing reporting systems for incidents of aggressive behavior)

2. Please list any methods you suggest using to prevent incidents of workplace violence:

I do hereby certify that I have performed a Site Exposure Assessment for the prevention of workplace violence.

Signature

Date

APPENDIX D

COUNTY OF COLUMBIA WORKPLACE VIOLENCE INCIDENT REPORT FORM

This form is to be used to report incidents of workplace violence, including, but not limited to any physical assault or acts of aggression occurring in the workplace, 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 conduct 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.

Your Name: _____ Title: _____

Department: _____ Work Phone: _____

Incident Date: _____ Time: _____ AM PM

Location of Incident: _____

Provide a detailed description of the incident, including events leading up to the incident and how the incident ended:

List the names and job titles of involved employees:

List the names or any other identifier of other involved individual(s):

Were you injured in the Incident: Yes No

If Yes, did you complete an Accident Report: Yes No

Date Completed: _____

If Yes, describe the nature and extent of the injuries arising from the incident:

Were there any witnesses: Yes No

If Yes, list the names and job titles of all witnesses

Did the Incident Involve a Weapon: Yes No

If Yes, what kind: Were police notified of this incident: Yes No

If Yes, which Police Dept.: _____

(Attach copy of police report)

Name of Perpetrator (if known): _____

Print Name: _____

Signature: _____ Date: _____

Copy 1- Commissioner Copy 2- Director Copy 3 & 4— Incident Log Copy 5-
Employee

APPENDIX E

Columbia County Department of Social Services
Incident Reporting Policy and Procedure

Incident Reporting

In the event an Employee of the Columbia County Department of Social Services or personnel from a Contract Agency housed at the Department (referred to as "Employee"), experiences any of the following types of incidents, he/she must complete the following steps in this policy to report the incident.

The types of incidents include, but are not limited to:

- Assault
- Disorderly Conduct
- Harassment
- Robbery
- Sexual Offense

Immediately following an incident, the Employee will *verbally* report the name(s) of any client(s) involved, and the time of day the incident occurred to the following personnel in order:

1. Deputy Sheriff
2. Switchboard Operator/Clerical Staff assisting with reception/switchboard
3. The Employee's immediate Supervisor
4. The Office of the Commissioner – Assistant to the Commissioner, or the Deputy Commissioner

From the Employee's information, the Switchboard Operator, or Clerical Staff assigned to the switchboard, will record the following on the yellow *Daily Incident Log* maintained at the reception area:

1. Name of Client(s) involved in the incident
2. Name of Employee reporting the incident

The Switchboard Operator, or Clerical Staff assigned to the switchboard will then contact the Transportation Department Supervisor to report the name(s) of the clients(s) involved in the reported incident.

Names of Clients that have been recorded on the Daily Incident Log will be communicated to an Employee from the Switchboard Operator if the Client(s) requests to see an Employee on that same day. This will enable the Employee to be made knowledgeable that an incident occurred.

Incident Report Forms

Within 24 hours following the incident (when possible), the Employee experiencing the incident must complete an *Incident Report Form*. Blank Incident Report Forms are available in the

Department of Social Services downstairs at the Front Reception desk, and upstairs outside of the Deputy Commissioner's and Commissioner's Offices.

While completing the form, any questions should be brought to the attention of the Commissioner, Deputy Commissioner or the Employee's immediate supervisor. The form must be completed in pen – Press Hard, five (5) copies are being made.

The completed form must be reported by the Employee to their immediate Supervisor, and then brought to the Assistant to the Commissioner's Office. In the absence of the Assistant to the Commissioner, forms must be given to the Administrative Assistant in Administration or in their absence, the Legal Secretary. The staff member receiving the form will separate the five copies and distribute them as follows:

- **White** Commissioner
- **Green** Director of the Employee's/Contract Agent's program
- **Yellow and Pink** Incident Review Logs
- **Gold** Employee

Incident Review Logs

There will be two (2) Incident Review Logs. One will be filed chronologically, and the other alphabetically. Incident Review Logs will be maintained by the Senior Clerk, and in their absence, the Principle Social Welfare Examiner in Employment/HEAP. Incident Review Logs will be located at the Front Desk Lobby in the Deputy Sheriff's station.

The Deputy Sheriff will be required, at minimum, to review the Incident Review Logs each morning of their assigned day in the Department of Social Services building.

Information contained within the Incident Review Logs is strictly confidential, and is not authorized for all Employees or Contract Personnel to view. Information within the Incident Review Logs is accessible only by the Commissioner, Deputy Commissioner, Program Directors, Principle Social Welfare Examiner in Employment/HEAP, Senior Clerk, Switchboard Operator, Support Staff assigned at that time to assist with the Front Desk, and the Deputy Sheriff.

Information Disclosure

Upon receipt of an Incident Review Form involving a Client, the Program Director will be responsible for informing and sharing only the Name of the Client and the Date of the incident with their Program staff. A staff member in each unit will be assigned to maintain Removable Round "Yellow" Coding Labels that will be applied to any client's file that has been involved in an incident.

Based on any incidents reported from the Incident Review Form, a listing will be maintained of Clients requiring Sheriff Deputy assistance upon entering the building. This listing will be located within the "Z- File" on the Public L Drive. Updates for the listing including additions and removals, as directed by the Commissioner, will be handled through the office of the Computer Services Coordinator, or his designee.

To ensure security for all employees and clients, staff is directed to obtain the client file *prior* to seeing any client. If the file is not available, staff is directed to access the Z-file to determine if the client is on the list of individuals requiring Deputy Sheriff assistance.

*Therefore, if there is a yellow sticker on a client file,
or a client's name appears on the Z-file, the employee is directed to
contact the Deputy Sheriff for assistance before meeting with the client.*

If the Deputy Sheriff is unavailable, the employee is directed to wait until the Deputy Sheriff is available. *Under no circumstances is an employee to see a client with a yellow sticker on their file, or their name appears on the Z-file, without Deputy Sheriff assistance.*

Failure to comply with this policy may result in disciplinary action.

This policy is effective June 1, 2009