

**PERU CENTRAL SCHOOL DISTRICT
WORKPLACE VIOLENCE PREVENTION PROGRAM**



Revised April 2024

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Overview of Workplace Violence Prevention Program

Background Information

In 2006, New York State enacted legislation requiring public employers to develop and implement programs to prevent and minimize workplace violence and help ensure the safety of public employees. To help prevent workplace violence in public schools, on September 6, 2023, the Governor signed legislation (S1746/A1120) amending the Workplace Violence Prevention Law (Section 27-b of Labor Law), extending coverage to elementary and secondary public education that was previously exempted.

Workplace Violence Definition

Workplace violence is 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 interest in causing fear of physical harm to the physical safety and health of such employee when such stalking has arisen through and in the course of employment.

Requirements of the New York State Workplace Violence Prevention Law

All public employers are required to do the following:

- Perform a risk evaluation of the workplace and determine the factors that place employees at risk from occupational assaults and homicide.
- Provide its employees with 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, as further described in Section 5(b) of the law and applicable regulations.
- Establish and implement a system for employees to report incidents of workplace violence.
- Develop and maintain a Workplace Violence Incident Report and review the report annually.
- Public employers with twenty or more full-time employees must develop and implement a written Workplace Violence Prevention Program. A written policy statement describing the goals and objectives of the Program must be posted where employee notices are usually posted. The Program must be made available, upon request, to employees, the employees' designated representatives and the Department of Labor.

Purpose of this Program

The purpose of the Peru Central School District Workplace Violence Prevention Program is to provide information to managers, supervisors, employees, and their authorized representatives about preventing and responding to incidents of workplace violence or threats of violence in accordance with the New York State Public Employer Workplace Violence Prevention Law.

The goal of this program is to reduce the probability of threats or acts of violence in the workplace and to ensure that any incident, complaint, or report of violence is taken seriously and dealt with appropriately as expeditiously as possible. This program outlines the major components of Peru Central School District's effort to meet these goals.

Access to Workplace Violence Prevention Program

The Peru Central School District Workplace Violence Prevention Program is available on the District website (www.perucsd.org). A paper copy is available upon request by contacting the District Office at (518) 643-6000.

Workplace Violence Prevention Policy Statement

Peru Central School District Workplace Violence Prevention Policy #8130.2

The district is committed to establishing and maintaining a safe and secure workplace for employees. Workplace violence is a safety hazard to the district, its employees, and everyone in the workplace, and will not be tolerated. All employees are expected to work together to create and maintain a safe and respectful work environment for everyone.

Workplace violence is defined as any physical assault or act of aggressive behavior occurring where employees perform any work-related duty in the course of their 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 their 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.

All employees are responsible for notifying their supervisor or other designated contact person of any violent incidents, threatening behavior, including threats they have witnessed, received, or have been told that another person has witnessed or received. All acts of workplace violence will be promptly and thoroughly investigated, and appropriate action will be taken, including contacting law enforcement where necessary.

Designated Contact Person:	Krista Devins
Title:	Account Clerk/Typist
Department:	District Office
Phone:	(518) 643-6004
E-mail:	kdevins@perucsd.org

As required by Labor Law §27-b, the district will develop and implement a Workplace Violence Prevention Program to comply with the law and its implementing regulations. The Program will include elements required by law and regulation, including:

- a. the risk factors present in the workplace;
- b. the methods the district will use to prevent incidents of violence in the workplace;
- c. the methods and means by which the district will address specific identified hazards;
- d. a system to report workplace violence incidents in writing;
- e. a written outline for employee training; and
- f. a plan for annual program and review and update.

In developing the Workplace Violence Prevention Program, the district will conduct an evaluation to identify likely potential risks of violence in the workplace. Authorized employee representative(s) will be involved in:

- a. evaluating the physical environment;
- b. developing the Workplace Violence Prevention Program; and
- c. 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.

Employee Notice and Training

As required by law, all employees will participate in Workplace Violence Prevention Training Program at the time of initial assignment and annually thereafter. Employees must be trained on:

- a. the details of the workplace violence prevention program;
- b. the measures they can take to protect themselves from risks of violence; and
- c. the specific procedures the district has implemented to protect employees (such as appropriate work practices, emergency procedures, and the use of security alarms).

Additionally, at the time of initial assignment and at least annually, employees will be informed of the requirements of Labor Law §27-b, the risk factors identified in the workplace, and the location of the district's Workplace Violence Prevention Program.

This policy must be posted where notices to employees are normally posted.

Allegations of Violations and Non-Retaliation

The process for employees to allege violations of the workplace violence prevention program to the state Commissioner of Labor, and the employment protections for doing so, is set forth in Labor Law §27-b and 12 NYCRR §800.6 and includes the following:

A "serious violation" of the workplace violence prevention program is the failure to develop and implement a program or address situations which could result in serious physical harm. "Imminent danger" is any condition or practice in the workplace where a danger exists which could reasonably be expected to cause death or serious physical harm immediately, or before the imminence of the danger can be eliminated through these complaint procedures.

Employees or their representatives who believe that a serious violation of the workplace violence prevention program exists or that an imminent danger exists (as defined above), must bring the matter to their supervisor's attention in writing, and must give the district a reasonable opportunity to correct the activity, policy or practice, before notifying the Commissioner of Labor. However, such prior written notice and opportunity for correction is not required if there is an imminent danger or threat 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.

If, after the matter has been brought to a supervisor's attention and a reasonable opportunity to correct the issue has passed, the issue has not been resolved and the employee still believes that a violation of the workplace violence prevention program remains or that an imminent danger exists, employees or their representatives may request an inspection from the Commissioner of Labor in writing. The Commissioner will provide a copy of the request to the district, but the employee may request that their name be withheld.

A district representative and authorized employee representative may accompany the Commissioner of Labor during the inspection to assist in the inspection. If there is no authorized employee representative, the Commissioner will consult with district employees concerning workplace safety.

The district will not take retaliatory action (terminate, suspend, demote, penalize, discriminate, or other adverse employment action in the terms and conditions of employment) against any employee because they have alleged a serious violation of the workplace violence prevention program, or imminent danger exists, requested an inspection by the Commissioner of Labor, or accompanied the Commissioner on the inspection, as prescribed by state law and regulation.

Cross-ref: 5300, Code of Conduct
8130, School Safety Plans and Teams

Ref: Labor Law §27-b
12 NYCRR §800.6

Adoption date: February 13, 2024

Workplace Risk Evaluation

The workplace risk evaluation is based on a physical assessment of District facilities and a comprehensive review of workers' compensation claims and workplace injury/illness documentation on file from the year prior to the development of the program. Any incidents that occur after the implementation of the program must be documented and analyzed during the required annual review of the program or necessary. Appendix 1 contains the results of the Workplace Risk Assessment and Appendix 2 contains the results of the Records Examination.

Although workplace violence can occur in any workplace, certain settings or factors may pose a greater degree of risk. Employment conditions that may pose a higher risk for Peru Central School District employees include, but are not limited to:

- Working in a public setting
- Working late night or early morning hours
- Working alone or in small groups
- Working in locations with uncontrolled and/or unrestricted access
- Working with volatile persons and/or students who exhibit violent behavior
- Working in locations without security cameras and/or metal detectors

Hierarchy of Controls and Workplace Violence Prevention Methods

Hierarchy of Controls

There are three main types of control measures that may be implemented as part of a safety program to protect employees from recognized hazards, including workplace violence. This is referred to as the hierarchy of controls.

1. *Engineering Controls* - Reduce the hazard through substitution or design. An example of an engineering control would be the installation of a physical barrier to protect employees from a member of the public (windows, deep counters). Engineering controls are not always feasible. If engineering controls are not feasible, the employer must then consider work practice controls.
2. *Work Practice Controls* - Reduce the hazard by changing organizational policies and procedures. An example of a work practice control would be requiring check-in procedures and/or itineraries to account for employees who work alone and are not under the direct supervision of management.
3. *Personal Protective Equipment* - For the most part, this type of intervention is not relevant to workplace violence prevention. An example of personal protective equipment would be ballistic body armor for law enforcement personnel.

Workplace Violence Prevention Methods

Peru Central School District has taken the following measures to reduce the likelihood of workplace violence incidents:

1. *Engineering Controls* – Security cameras and security lighting have been installed throughout the District’s facilities. Administrators and the School Resource Officer have the ability to monitor and review security camera footage to identify potential threats or incidents of workplace violence. The District’s exterior entrances are locked during the school day and can be opened by employer-issued proximity badges. Classroom staff are instructed to keep classrooms locked during the school day in case of an emergency.
2. *Work Practice Controls* – Classrooms are equipped with phones to call for assistance and report emergencies. Custodial/Maintenance employees, Administrators, and Bus Drivers are provided with radios to call for assistance and report emergencies. Employees are instructed to contact a supervisor if they are presented with a violent individual through the course of their employment. Classroom staff have the opportunity to participate in de-escalation training on an annual basis. Visitors to the District are screened in secure vestibules prior to entering school buildings. Evacuation drills are conducted on a regular basis. The Board of Education has adopted numerous policies that address issues related to threats and/or workplace violence and therefore assist in the prevention of workplace violence.

In addition to the controls mentioned above, as part of the District’s Workplace Violence Prevention Program, all employees are required to participate in workplace violence prevention training.

Prevention of violence in the workplace is the responsibility of every employee. The following section focuses on early warning signs and workplace issues that have the potential to trigger violent behavior. Supervisors and employees should be familiar with the issues below in order to reduce the likelihood of workplace violence.

Early Warning Signs of Potential Workplace Violence

Past behavior has generally been the best predictor of future behavior. There is no specific “profile” of a potentially dangerous individual. Acts of violence may also occur in the workplace due to issues of domestic violence. Sometimes victims and witnesses recount acts of violence that occurred without warning. However, certain patterns of behavior and events frequently precede episodes of violence.

A list of indicators of increased risk of violent behavior may include:

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

These behaviors should be reported to an employee's Supervisor.

Sometimes, small behavior problems, which can precede the above behaviors, are dismissed or ignored, allowing problems to fester. In the employee's mind, the situation can become more intense. It is important to remember the employee must be treated with dignity, mutual respect and fairness in the process. Some of these types of behavior are listed below.

- Withdrawal from friends, coworkers, and/or one's social circle
- Reduced productivity
- Unexplained absence from work area or marked increase in tardiness and/or absenteeism
- Noticeable deterioration of personal hygiene and appearance

Common Issues that may Trigger Workplace Violence

Categories of common issues that may trigger workplace violence are listed below.

Employee issues:

- Negative performance reviews or criticism of job performance
- Unwanted changes in roles due to performance or restructuring
- Conflict with coworkers and/or supervisors
- Personal stress outside the workplace
- Increased workload or pressure

Workplace issues:

- No clearly defined rules of conduct
- Lack of training
- Inadequate hiring practices or screening of potential employees
- Insufficient supervision
- Insufficient or inconsistent discipline in the workplace
- Failure to address incidents as they occur
- Working with volatile individuals

The following three key elements may help to prevent the occurrence of workplace violence:

1. Recognizing early warning signs such as a change in a person's behavior prior to a violent incident.
2. Recognizing issues or events that may trigger violence.
3. Early intervention to prevent a violent incident from occurring.

Employees should exercise caution when making assumptions or relying solely on any of the above behaviors or circumstances as indicators of workplace violence.

Reporting Incidents of Workplace Violence

Any employee, upon becoming aware of an incident of workplace violence at Peru Central School District, must immediately report the facts and circumstances of the incident to their Supervisor.

If there is an imminent threat to the safety of the employee or others, the employee must immediately initiate the appropriate emergency response in accordance with the Building Level Emergency Response Plan (BLERP) and Districtwide Emergency Response Plan (DERP) in addition to notifying their Supervisor.

The employee (or an authorized employee representative) must also complete a Workplace Violence Incident Report (see Appendix 3) and forward it to the employee's supervisor. The supervisor will conduct a preliminary investigation of the incident and appropriate action as necessary. The supervisor will review the Workplace Violence Incident Report and forward it to the Designated Contact Person listed on page 5.

In addition to a Workplace Violence Incident Report, additional forms may need to be completed, such as an Accident Report, a Workers' Compensation claim, a Student Incident Report, and/or a General Incident Report.

Retaliation against an employee who makes a good faith report of workplace violence is strictly prohibited.

Employee Training Plan

Employees shall be trained on the Workplace Violence Prevention Program upon being hired by Peru Central School District and shall receive training annually thereafter. Information shall be provided to affected employees whenever significant changes are made to the Workplace Violence Prevention Program. Training shall address the following topics:

- Requirements of New York State workplace violence regulations
- Risk factors identified in the workplace risk evaluation
- Workplace violence prevention methods and warning signs
- Workplace violence reporting and response procedures
- The location of the written program and how to obtain a copy

Recordkeeping Requirements

Peru Central School District shall continue to adhere to the recordkeeping requirements outlined in 12NYCRR Part 801.

Furthermore, all incidents of workplace violence will be investigated and documented to ensure that they are reported to management. These reports will be maintained to create a historical record of workplace violence threats and/or incidents so management can respond appropriately.

Program Review

Peru Central School District and its authorized employee representatives shall evaluate the effectiveness of the Workplace Violence Prevention Program at least annually or after any serious incident of workplace violence.

The program review will consist of reviewing workplace violence incident reports. The program review will focus on identifying incident trends, addressing root causes of workplace violence, evaluating the effectiveness of existing control measures, and determining whether changes to the program are

necessary. The review will also assess the effectiveness of the reporting and recordkeeping systems in collecting all relevant information.

The cover page of the written Workplace Violence Prevention Program will be updated annually with the date of the program review.

Questions, comments, or concerns related to the Peru Central School District Workplace Violence Prevention Program should be directed to Kara Bowes, School Business Executive, at (518) 643-6003 or kbowes@perucsd.org.

Employee Complaints to the Commissioner of Labor

Employee complaint procedures under the workplace violence regulation are different than those under the PESH Act.

Any employee or his or her authorized employee representative who believes that a serious violation of the employer's workplace violence prevention 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.

Written notice to an employer is not 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.

If, after notifying the supervisor and giving the employer a reasonable opportunity to correct the situation, the employee or the authorized employee representative still believes that a serious violation of a workplace violence prevention program remains or that imminent danger exists, such employee may request an inspection by notifying the Public Employee Safety and Health Bureau ("PESH") at the New York State Department of Labor. 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.

Appendix 1: Workplace Risk Assessment

Facility Name: Primary / Intermediate / Middle School / High School Academic Buildings

Date of Survey: March 6, 2024

Facility Address: 116 Pleasant Street, Peru, NY 12972 (Primary and Intermediate)
17 School Street, Peru, NY 12972 (Middle School and High School)

Person(s) Conducting Assessment:

Employer Representatives: Superintendent, Business Executive, Director of Facilities

Employee Representatives: PAC - Director of Students Services, Primary Principal, Intermediate Principal
PAT - Teacher, Teaching Assistant

CSEA - Teacher Aide/Student Aide, Account Clerk/Typist, Building Maintenance Worker

Area Assessed	Primary	Intermediate	Middle School	High School	Notes/Comments	Control(s) Identified
General:						
Employees work in public setting	Yes	Yes	Yes	Yes		Building security measures, student Code of Conduct, Supervisors onsite.
Employee work late at night or early morning hours	Yes	Yes	Yes	Yes		Night shift employees are equipped with radios.
Employees work alone or in small numbers	Yes	Yes	Yes	Yes		Classrooms/offices are equipped with phones and/or radios.
Employees exchange money as part of job	Yes	Yes	Yes	Yes	Food service and clerical staff.	Deposits are made daily so large sums of money are not held on the premises.
Employees work in location with uncontrolled public access	Yes	Yes	Yes	Yes	During events and special functions.	Employees have access to phones and/or radios and the District employees an after hours building checker.
Employees work in area of previous security concerns	N/A	N/A	N/A	N/A		
Employees work in high crime area	No	No	No	No		
Employees work with volatile persons	Yes	Yes	Yes	Yes		TCIS, de-escalation, and threat assessment training is offered on an annual basis.

Does facility have posted evacuation plan/map?	Yes	Yes	Yes	Yes		
Does facility conduct routine evacuation/fire drills?	Yes	Yes	Yes	Yes		
Are electric panels locked to prevent unauthorized access?	Yes	Yes	Yes	Yes		
Is shrubbery, trees and landscaping maintained to minimize obstructions to entrances and exits?	Yes	Yes	Yes	Yes		
Area Assessed	Primary	Intermediate	Middle School	High School	Notes/Comments	Control(s) Identified
Security:						
Does the facility use Resource Officers? If yes, # R.O. per facility:	Yes	Yes	Yes	Yes	One for entire district.	
Is security or law enforcement present at this location? If yes, list # present per shift:	Yes	Yes	Yes	Yes	One during school hours.	
Is security/law enforcement posted at entrances? If yes, list entrances:	No	No	No	No		Building exteriors are equipped with security cameras.
Do security/law enforcement personnel patrol facility?	Yes	Yes	Yes	Yes		
Are I.D. badges required to be worn by all personnel?	Yes	Yes	Yes	Yes		
Are students required to use school issued I.D. badges when on premises?	No	No	No	No		Staff has access to SchoolTool, which includes photos of all students.
Is card reader or equivalent required for entry to facility?	Yes	Yes	Yes	Yes		
Is facility equipped with metal detectors?	No	No	No	No		Buildings are equipped with security cameras and an SRO is on campus.
Is facility equipped with security cameras?	Yes	Yes	Yes	Yes		

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Site Risk Assessment Survey**

Is facility equipped with panic buttons?	Yes	Yes	Yes	Yes		
Are visitors permitted to enter facility?	Yes	Yes	Yes	Yes		
Are visitors required to wear visitor I.D. badges?	Yes	Yes	Yes	Yes		
Are emergency contact names and phone numbers posted in each occupied room?	No	No	No	No		911 is universally known as an emergency number; the District will consider adding emergency contacts to the quick reference card in each room.
Is each room equipped with a telephone or radio to call for help when needed?	Yes	Yes	Yes	Yes		
Area Assessed	Primary	Intermediate	Middle School	High School	Notes/Comments	Control(s) Identified
Parking Lots:						
Are parking areas protected with security/law enforcement personnel?	No	No	No	No		Parking lots are equipped with cameras and lights.
Are parking areas patrolled by security/law enforcement personnel?	Yes	Yes	Yes	Yes		
Are parking areas equipped with security cameras?	Yes	Yes	Yes	Yes		
Are parking areas equipped with lights?	Yes	Yes	Yes	Yes		
Area Assessed	Primary	Intermediate	Middle School	High School	Notes/Comments	
Offices:						
Do office areas have controlled access?	No	No	No	No		External visitors must check in securely before entering the building.
Is office area separated from entrance with privacy glass?	No	No	No	No		
Is office area equipped with panic alarm?	Yes	Yes	Yes	Yes		

Are offices equipped with telephones to call 911?	Yes	Yes	Yes	Yes		
Are telephones or radios used to communicate with facility personnel?	Yes	Yes	Yes	Yes		
Are office doors equipped with door locks to prevent unauthorized access?	Yes	Yes	Yes	Yes		
Do employees receive de-escalation training?	Yes	Yes	Yes	Yes	Some employees, not all.	TCIS, de-escalation, and threat assessment training is offered on an annual basis.
Area Assessed	Primary	Intermediate	Middle School	High School	Notes/Comments	Control(s) Identified
Classrooms:						
Are evacuation maps posted in each classroom?	Yes	Yes	Yes	Yes		
Are classroom doors equipped with locks to restrict access?	Yes	Yes	Yes	Yes		
Are classrooms equipped with telephones?	Yes	Yes	Yes	Yes		
Are classroom personnel equipped with radios?	No	No	No	No		Classrooms are equipped with phones in case of emergency.
Is personal protective equipment provided to all classroom personnel as needed?	Yes	Yes	Yes	Yes		
Are classroom personnel exposed to violent behavior from students?	Yes	Yes	Yes	Yes		
Do classroom personnel receive de-escalation training?	Yes	Yes	Yes	Yes	Some employees, not all.	TCIS, de-escalation, and threat assessment training is offered on an annual basis.
Are classroom personnel informed of students with behavioral issues prior to student placement in classroom?	Yes	Yes	Yes	Yes		

Have classroom personnel been provided with training on working with students with behavioral issues?	Yes	Yes	Yes	Yes	Some employees, not all.	TCIS, de-escalation, and threat assessment training is offered on an annual basis.
Are windows locked to prevent uncontrolled access?	No	No	No	No	Windows latch but do not lock.	
Is availability to items that can be used as weapons by students minimized?	Yes	Yes	Yes	Yes		
Are classrooms equipped with security cameras?	No	No	No	No		Classrooms are equipped with phones in case of emergency.
Area Assessed	Primary	Intermediate	Middle School	High School	Notes/Comments	Control(s) Identified
Cafeteria:						
Is access restricted to authorized personnel only?	No	No	No	No		Designated staff members monitor cafeterias during the day.
Does cafeteria personnel exchange money with students and staff?	Yes	Yes	Yes	Yes		Cafeteria deposits are made daily to avoid sums of money being held onsite.
Are cafeteria personnel provided with necessary personal protective equipment?	Yes	Yes	Yes	Yes		
Is cafeteria equipped with security cameras?	Yes	Yes	Yes	Yes		
Is cafeteria locked when not in use?	No	No	No	No		Designated staff members monitor cafeterias during the day.
Is cafeteria staff provided with telephones and/or radios?	Yes	Yes	Yes	Yes		
Are evacuation maps posted at all exits?	Yes	Yes	Yes	Yes		
Area Assessed	Primary	Intermediate	Middle School	High School	Notes/Comments	Control(s) Identified
Auditorium:						
Are all entrances kept locked when not in use?	No	No	N/A	No		Hallways have security cameras.

Is auditorium, stage, backstage equipped with security cameras?	No	Yes	N/A	No		
Is auditorium, stage, backstage equipped with security lighting?	No	No	N/A	Yes		
Is backstage entrance restricted to authorized personnel only during events?	No	No	N/A	No		
Are catwalks, light towers, etc. restricted to authorized personnel only?	No	N/A	N/A	No		
Is auditorium patrolled by security/law enforcement during events?	No	No	N/A	No		
Area Assessed	Primary	Intermediate	Middle School	High School	Notes/Comments	Control(s) Identified
Gymnasium:						
Does gymnasium have exterior lighting around all entrances and exits?	Yes	Yes	Yes	N/A		
Are locker rooms locked or monitored to prevent unauthorized entry?	N/A	N/A	Yes	Yes		
Is the area patrolled by security/law enforcement during events?	No	No	No	No		Administrators or school personnel are present during events.
Is gymnasium equipped with security cameras?	Yes	Yes	Yes	Yes		
Area Assessed	Primary	Intermediate	Middle School	High School	Notes/Comments	Control(s) Identified
Athletic Fields:						
Is security/law enforcement present for all sporting events, home & away?	No	No	No	No		Administrators or school personnel are present during events.
Are athletic fields protected from unauthorized entry with fences?	No	No	No	No		Administrators or school personnel are present during events.

Are athletic fields equipped with security/event lighting?	No	No	No	No	Only football field has lighting.	Administrators or school personnel are present during events.
Are I.D.s required to be worn by school personnel at sporting events?	Yes	Yes	Yes	Yes		
Area Assessed	Primary	Intermediate	Middle School	High School	Notes/Comments	Control(s) Identified
Field Trips:						
Do school personnel have a copy of emergency contact names and numbers for administration?	Yes	Yes	Yes	Yes		
Does school personnel verify I.D. of each student at beginning and end of trip?	No	No	No	No		
Do chaperones receive security briefings prior to trip?	No	No	No	No		
Area Assessed	Primary	Intermediate	Middle School	High School	Notes/Comments	Control(s) Identified
Staff Meetings & Conferences:						
Do security/law enforcement personnel patrol facility during these events?	Yes	Yes	Yes	Yes		
Do school personnel receive de-escalation training	Yes	Yes	Yes	Yes	Some do, not all	TCIS, de-escalation, and threat assessment training is offered on an annual basis.
Are metal detectors utilized for after hours activities such as conferences & meetings?	No	No	No	No		Buildings are equipped with security cameras, and school personnel are onsite.

PERU CENTRAL SCHOOL DISTRICT
Site Risk Assessment Survey

Facility Name: Maintenance Building and Bus Garage
Date of Survey: March 7, 2024
Facility Address: 17 School Street, Peru, NY 12972 (Middle School and High School)
Person(s) Conducting Assessment:
Employer Representatives: Superintendent, Business Executive, Director of Facilities, Transportation Supervisor
Employee Representatives: CSEA - Teacher Aide/Student Aide, Account Clerk/Typist, Building Maintenance Worker

Area Assessed	Maintenance Building	Bus Garage	Notes/Comments	Control(s) Identified
General:				
Employees work in public setting	Yes	Yes		
Employee work late at night or early morning hours	Yes	Yes		Night shift employees and bus drivers are equipped with radios.
Employees work alone or in small numbers	Yes	Yes		Night shift employees and bus drivers are equipped with radios.
Employees exchange money as part of job	No	No		
Employees work in location with uncontrolled public access	Yes	Yes		Employees have access to phones and/or radios and the District employees an after hours building checker.
Employees work in area of previous security concerns	N/A	N/A		
Employees work with public	Yes	Yes		
Employees work in high crime area	No	No		

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Employees work with volatile persons	No	Yes		TCIS, de-escalation, and threat assessment training is offered on an annual basis.
Does facility have posted evacuation plan/map?	Yes	Yes		
Does facility conduct routine evacuation/fire drills?	No	Yes		
Are electric panels locked to prevent unauthorized access?	Yes	No		
Is shrubbery, trees and landscaping maintained to minimize obstructions to entrances and exits?	Yes	Yes		
Area Assessed	Maintenance Building	Bus Garage	Notes/Comments	Control(s) Identified
Security:				
Does the facility use Resource Officers? If yes, # R.O. per facility:	No	No		Building exteriors are equipped with security cameras.
Is security or law enforcement present at this location? If yes, list # present per shift:	N/A	N/A		
Is security/law enforcement posted at entrances? If yes, list entrances:	N/A	N/A		
Do security/law enforcement personnel patrol facility?	No	No		Building exteriors are equipped with security cameras.
Are I.D. badges required to be worn by all personnel?	Yes	Yes		
Are students required to use school issued I.D. badges when on premises?	N/A	N/A		

PERU CENTRAL SCHOOL DISTRICT
Site Risk Assessment Survey

Is card reader or equivalent required for entry to facility?	Yes	Yes		
Is facility equipped with metal detectors?	No	No		Buildings are equipped with security cameras and an SRO is on campus.
Is facility equipped with security cameras?	Yes	Yes		
Is facility equipped with panic buttons?	No	No		Facilities are equipped with phones and employees are equipped with radios.
Are visitors permitted to enter facility?	No	No		
Are visitors required to wear visitor I.D. badges?	N/A	N/A		
Are emergency contact names and phone numbers posted in each occupied room?	No	No		911 is universally known as an emergency number; the District will consider adding emergency contacts to the quick reference card in each room.
Is each room equipped with a telephone or radio to call for help when needed?	Yes	Yes		
Area Assessed	Maintenance Building	Bus Garage	Notes/Comments	Control(s) Identified
Parking Lots:				

PERU CENTRAL SCHOOL DISTRICT
Site Risk Assessment Survey

Are parking areas protected with security/law enforcement personnel?	No	No		Parking lots are equipped with cameras and lights.
Are parking areas patrolled by security/law enforcement personnel?	No	No		Parking lots are equipped with cameras and lights and there is an SRO on campus.
Are parking areas equipped with security cameras?	Yes	Yes		
Are parking areas equipped with lights?	Yes	Yes		
Area Assessed	Maintenance Building	Bus Garage	Notes/Comments	Control(s) Identified
Buildings & Grounds				
Are buildings equipped with security cameras?	Yes	Yes		
Are buildings equipped with security lighting?	Yes	Yes		
Are buildings/rooms locked when not in use?	Yes	Yes		
Are employees provided with radios?	Yes	Yes		
Is equipment locked up when not in use?	Yes	Yes		
Area Assessed	Maintenance Building	Bus Garage	Notes/Comments	Control(s) Identified
Bus Garage and Buses:				
Are all buses equipped with radios?	N/A	Yes		
Are all buses equipped with security cameras?	N/A	Yes		
Is somebody available to respond to all radio calls from drivers that are on road?	N/A	Yes		

PERU CENTRAL SCHOOL DISTRICT
Site Risk Assessment Survey

Are I.D.s required by individuals getting on buses?	N/A	No		Bus drivers have a student roster for each route.
Do all bus runs have two employees on board for each run?	N/A	No		Certain bus runs have bus monitors; all buses are equipped with radios and cameras.
Are buses secured or locked when not in use?	N/A	No		Buses cannot be locked, but are stored indoors or within view of security cameras.
Is bus garage equipped with security cameras?	N/A	No		The bus garage is equipped with radios and phones.
Is bus garage locked when vacant?	N/A	Yes		
Area Assessed	Maintenance Building	Bus Garage	Notes/Comments	Control(s) Identified
Field Trips:				
Do school personnel have a copy of emergency contact names and numbers for administration?	N/A	Yes		
Does school personnel verify I.D. of each student at beginning and end of trip?	N/A	No		Student rosters are verified.
Do chaperones receive security briefings prior to trip?	N/A	No		

Appendix 2: Records Examination

Records Examination

Records Examined	Result of Examination
Workers' Compensation Reports from calendar year 2023	Employees reported twenty-one (21) incidents of workplace violence perpetrated by students

Assessment of Relevant Policies, Practices, and Procedures

Policies Examined	Result of Examination
0100.1 – Non-Discrimination and Anti-Harassment	Defines discrimination and harassment and prohibits all forms of discrimination or harassment on the basis of legally protected categories on school grounds and school-sponsored events.
0110 – Sexual Harassment	Defines sexual harassment and prohibits all forms of sexual harassment on school grounds, school buses, and all school-sponsored events, or outside the school setting if the harassment impacts the individual's education or employment.
0115 – Bully Prevention and Intervention	The BOE prohibits all forms of bullying on school grounds, school buses and at all school sponsored events, and using the District's IT network to send communications of a bullying nature.
1440 – Complaints About School Personnel	Establishes the procedure for reporting complaints about school personnel.
4351 – Field Trips and Excursions	Establishes standards and protocols for safety, supervision, and chaperone training for school-related field trips.
5300 – Code of Conduct	Establishes the acceptable code of conduct by students.
5710 – Violent and Disruptive Incident Reporting	A report of all the violent and disruptive incidents that have occurred on school grounds, at a school function, or at a school-sponsored event must be reported annually to the Superintendent and the Commissioner of Education.
8110 – Campus Safety and Maintenance	Complaints related health and safety issues in the District's buildings must be investigated and resolved consistent with the requirements of state law and regulations.
8130 – School Safety Plans and Teams	The BOE shall adopt and amend a district wide school safety plan and building-level emergency response plan(s) regarding crisis

	intervention, emergency response and management.
8211 – Access to Buildings	The policy establishes that access to district facilities will be limited to those who have a legitimate purpose for being on District property; exterior doors are to be locked; and visitors must present photo ID and sign in and out of facilities.
8832 – Bomb Threats	The District develops and maintains a districtwide response plan to bomb threats.
9140.1 – Staff Complaints and Grievances	The BOE provides grievance procedures for employees not covered by collective bargaining agreements or whose negotiated agreements do not include grievance procedures.
9645 – Disclosure of Wrongful Conduct	The policy defines wrongful conduct and describes the expectation of District employees and officers to report wrongful conduct, the steps that shall be taken when wrongful conduct is reported, and establishes “whistleblower” protections.

Appendix 3: Workplace Violence Incident Report

