

OFFICE OF POLICY, PROCEDURES AND TRAINING

James K. Whelan Executive Deputy Commissioner

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SUBJECT:	APPLICABLE TO:		ISSUED:	
Workplace Violence Prevention Program	All DHS Staff		September 23, 2019 Replaces Procedure 12-270	
ADMINISTERED BY:		APPROVED BY:		
DHS Health and Safety Office	and Safety Office		dministrator	
		Department of Soc Department of Hor		

Introduction

The mission of the New York City Department of Homeless Services (DHS) is to prevent homelessness when possible, address street homelessness, provide safe temporary shelter, and connect New Yorkers experiencing homelessness to sustainable housing. We do this with accountability, empathy, and equity. DHS provides intervention, temporary housing, rental assistance, housing resources, and prevention to New Yorkers who have been homeless, are currently experiencing homelessness, or are at risk of becoming homeless. DHS operates shelters for single adults, adult families and families with children.

DHS operates its main office at 33 Beaver Street in Manhattan. The building houses DHS' executive, programmatic, and administrative divisions. Staff work alongside contracted security personnel, DHS peace officers, and the New York City Police Department (NYPD). DHS staff also work at intake, assessment, and directly-operated shelters which have on-site social services and security. DHS has various field teams that travel to shelter sites to conduct routine and compliance inspections, and right sizing, as well as outreach teams that coordinate services for people experiencing street homelessness. In addition, DHS operates a warehouse where support and trade staff are stationed to store bulk facility supplies and manage all commodities (i.e., goods and services). At each of these work sites, DHS employees may interact with other public employees, with DHS clients, with provider organizations, and members of the public. DHS employs over 1,600 public employees.

■ Workplace Violence Definition

Workplace violence is defined as physical or verbal assault or abuse¹, threatening behavior, harassment, or violence by the general public, clients, employees, relatives, or domestic partners for the employees.

■ Workplace Violence Prevention

The Workplace Violence Prevention Law (Section 27-b of the New York State Labor Law) requires public employers to identify and evaluate the risks of workplace violence and to design and implement a Workplace Violence Prevention Program to prevent, reduce, and minimize the hazards of workplace violence for public employees.

■ Policy

All instances of physical violence (e.g., assaults, homicides), attempted assaults, and threats reasonably perceived to result in physical violence, or other conduct that would be reasonably expected to lead to an assault or a homicide, will be thoroughly investigated and appropriate action will be taken, including making arrests when warranted.

DHS is committed to its Workplace Violence Prevention Program and will complete an annual review to address risk factors and review reports of workplace violence. DHS management and authorized employee representatives will participate in the review.

■ Compliance

DHS must evaluate its operations and facilities' portfolio to identify factors and situations that might put employees at risk of workplace violence. DHS developed and implemented a written workplace violence prevention program and is training all staff on the risks of workplace violence.

DHS assessed the risks of workplace violence to public employees at its workplaces and met with directors, supervisors, and other key individuals to discuss risk factors at DHS worksites. A workgroup of authorized employee representatives also conducted walkthroughs at worksites. The following sections describe the identified risks and the programs and policies in place about workplace violence prevention at DHS facilities and operations.

DHS is committed to maintaining a safe and secure work environment for all employees and has several policies and procedures in place to reinforce expectations and protect staff from workplace violence, including the following:

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¹ Verbal assault or abuse in the context of this policy does not generally include simple teasing, off-hand comments or isolated incidents that are not of a serious nature.

- DHS peace officers and contracted security personnel at facilities regularly conduct security assessments and suggest improvements based on those findings;
- Signage in buildings where DHS employees are stationed informs the public of the legal consequences of assaulting social service personnel;
- All employees are responsible for helping to create and maintain a respectful work environment (for each other, as well as for clients and the public); for following all policies, procedures, and program requirements;

All DHS employees receive a copy of the DHS Code of Conduct at orientation, which prohibits workplace violence and all other types of disruptive behavior. Violent or disruptive conduct is subject to discipline. All managers are responsible for enforcing the DHS Code of Conduct to deter employees at all facilities from engaging in altercations with co-workers. Employees must sign a notice of comprehension as part of the orientation process;

- Behavior of a criminal nature is reported to the NYC Department of Investigation (DOI) and the NYPD as appropriate;
- An employee who wants to bring an order of protection (for domestic violence or other criminal conduct) to the attention of DHS should contact the Office of Diversity & Equal Opportunity Affairs (EEO) at (212) 361-8003.

DHS shall implement and maintain measures to prevent workplace violence in offices and facilities:²

- Security stationed at access control in shelters to screen all entrants via metal detector or x-ray detector and seize contraband.
- Engineering controls (e.g., design/modification of structural, physical or technological controls) including security cameras in the elevators of 33 Beaver Street and the ombudsman's interview rooms on the 20th floor.
- Administrative controls (e.g., mandatory incident reporting, distribution of Agency Code of Conduct, hiring of additional security personnel).
- Personnel protective equipment (e.g., gloves, batons, pepper spray).
- Reporting Workplace Violence Incidents

Security-related issues in DHS work locations should first be brought to the attention of onsite security personnel who will take appropriate action, in accordance with the DHS policy on incident reporting. However, if there is a serious emergency requiring immediate action, employees should call both 911 and the DHS Police at 212-361-7911.

² For additional information on control measures refer to DHS-28b Location Types, Risk Levels, Risk Factors and Control Measures

- DHS Police are alerted to 911 calls from an agency desk telephone. Notifications include the date and time of the call, originating facility, login name, and telephone number.
- Upon receipt, DHS Police are required to call the originating telephone number to request further details and ensure the appropriate security personnel were notified.
- If staff encounter incidents at provider-run locations or offsite, they should contact their immediate supervisor and notify DHS police at 212-361-7911. If the situation warrants, they should contact 911 directly.

Reporting Workplace Violence Incidents to the Health and Safety Office

All information or reports prepared in connection with workplace violence incidents will be secured by the Safety Liaison. Following an incident of workplace violence, the Safety Liaison must alert the DHS Health and Safety Officer (HSO) at dhs.nyc.gov detailing who was involved, what happened, and when and where it happened (e.g., site name, building address, floor). The email must include any response from medical, fire department, or police personnel.

As warranted based on the seriousness of the matter, the Safety Liaison will collaborate with the Department of Social Services (DSS) Labor Relations, DSS Legal Affairs, and the DHS Health and Safety Office on review or investigation. Based on the collective outcome, DSS Labor Relations and Legal Affairs will make a decision.

■ Filing a Notice of Appeal

- DSS Labor Relations and DSS Legal Affairs will notify the employee of the determination within seven (7) business days
- If the employee disagrees with the determination or reasonably believes there is a reportable violation of the Workplace Violence Policy, they can file an appeal externally with the New York State Department of Labor - Public Employee Safety and Health (PESH); 75 Varick Street, NY, NY 10013.

■ Role of the Safety Liaison

The Safety Liaison at the shelter level collaborates with the DHS Health and Safety Office and is the point of contact for all health and safety issues. Any issues regarding the following topics must be communicated directly to the DHS Health and Safety Office:

- Right to Know (dangerous chemicals used at the workplace);
- Environmental hazards (lead-based paint, asbestos, mold and mildew);
- Vermin (roaches, rodents, bedbugs, other);
- Incidents of workplace violence;
- Injuries or occupational Illnesses; and

Other hazards (secondhand smoke, excessive cold/heat, dust/indoor air quality).

In addition, the Safety Liaison will also work closely with the DHS Health and Safety Office to compile documentation required for compliance and reporting purposes by emailing dhshealthandsafety@dhs.nyc.gov or calling 212-361-7471.

For workplace violence incidents, the Safety Liaison will notify the Health and Safety Office and receive guidance on next steps. If a staff member is ill or injured and completed a workers' compensation package, the Safety Liaison will share the details of those specifics with the Health and Safety Office for recordkeeping and mandatory reporting purposes.

All designated Safety Liaisons will meet with the Health and Safety Officer for introductions; discussion of the role and expectations of the Safety Liaison in conjunction with the Health and Safety Office; and mandatory training in workplace violence prevention and other relevant topics, such as Right-to-Know and PESH mandated reporting. In the absence of the Safety Liaison, supervisory personnel authorized to provide location coverage must notify the Health and Safety Office.

■ Recordkeeping of Workplace Violence Incidents

All records of reported workplace violence incidents must be reported to the DHS Health and Safety Office for recordkeeping purposes. Reports that result in workers' compensation claims filed due to illness, injury, or absence from the worksite will be compiled by the Safety Liaison and the Health and Safety Office. The Health and Safety Office must then document and post those instances annually as mandated by PESH.

Risk Evaluation - Outcome

DHS conducted a risk evaluation of the agency's operations and facilities and identified likely risk factors and assigned site specific risk level ratings and control measures. (See DHS-28b Location Types, Risk Levels, Risk Factors and Control Measures.)

<u>Note</u>: Safety Liaisons should report any changes to the status of established location control measures to the DHS Health and Safety Office and/or as applicable, submit a work order request for necessary repair.

In response to identified areas of concern, DHS facilitated the following corrective actions to minimize or eliminate the likelihood of such occurrences:

- 1. Established a Health and Safety Office and hired a Health and Safety Officer to collaborate with designated liaisons at the shelter level to do the following:
 - a. Identify and document/report instances of workplace violence incidents;
 - b. Facilitate training to promote awareness and educate staff of associated risks and safety measures;
 - c. Promote prevention and safety measures; and

- d. Collaborate with involved parties to ensure compliance relative to recordkeeping and reporting.
- Created a written DHS Workplace Violence Prevention Policy Statement to accompany this written procedure, which highlights and promotes awareness. The policy statement must be prominently posted in a conspicuous location at all designated locations. (See DHS-28a Workplace Violence Prevention Policy Statement.)
- 3. Developed a Workplace Violence Prevention Program Training Course to promote awareness, inform and educate employees of the potential safety concerns and recommended precautions, and provide employees with annual mandatory training. (See DHS-28 Workplace Violence Prevention Program Training Course Outline.)

The DHS Workplace Violence Prevention Program will be reviewed annually, or when there is a significant change in agency operations. The review will assess past incidents and trends or any responsive remedial measures which may be warranted. This review will be conducted by Labor Relations and Legal Affairs, in conjunction with DHS management and authorized employee representatives.

Employees with questions and or concerns about the DHS Workplace Violence prevention Program can go to their immediate supervisor, location Safety Liaison, or the Health and Safety Office at dhshealthandsafety@dhs.nyc.gov or 212-361-7471.

Attachments

DHS-28	DHS Workplace Violence Prevention Program Training Course Outline
DHS-28a	DHS Workplace Violence Prevention Policy Statement
DHS-28b	Location Types, Risk Levels, Risk Factors and Control Measures



DHS Workplace Violence Prevention Program Training Course Outline

1. Introduction

2. Training Objectives

- a. Discuss rules and regulations of Workplace Violence
- b. Define workplace violence
- c. Types and categories of Workplace Violence
- d. List risk factors for potential violence in the workplace
- e. Risk Assessment
- f. Control Measures
- g. Overview of DHS Workplace Violence Prevention (WVP) Program
- h. Measures which DHS employees can take
- i. Overview of contact information
- i. Active Shooter Situations

3. Rules and Regulations

- a. Overview of NYS Workplace Violence Prevention Law
- b. Overview of Social Service Worker Assault Law

4. Definition of Workplace Violence

a. Workplace Violence incidents are described in the law as "incidents of occupational assaults and homicides." It is an intentional violent act by a person against an employee.

5. Types and Categories of Workplace Violence

Types	Categories	
Physical Assault	Violence by strangers/general public	
Threatening Behavior	Violence by clients	
Verbal Abuse	Violence by employees	
Harassment	Domestic partners/relatives of employees	

6. Risk Factors Identified in DHS Workplace

- a. Low Risk Locations (Administrative Offices)
- b. High Risk Locations (Shelters, Field Staff)

7. Risk Assessment

- a. Conducting a risk assessment of your facility
- b. Annual review of Risk Assessment and WVP program
- c. Union Participation during Risk Assessment process

8. Control Measures Taken at DHS

- a. Engineering Controls (design/modification of structural, physical or technological)
- b. Administrative Controls (mandatory reporting of incidents, distribution of Agency Code of Conduct, hiring of additional security personnel)
- b. Annual Workplace Violence training and other Training

9. Overview of DHS Workplace Violence Prevention Program

- a. DHS Workplace Violence Policy Statement
- b. Contents of the DHS Workplace Violence Prevention Procedure
- c. Location and availability of the written program

10. Measures Which DHS Employees Can Take

- a. Avoiding workplace violence (conflict resolution/de-escalation)
- b. Reporting incidents (immediate supervisor, DHS-PD)
- c. Role of the safety liaison at your facility

11. Overview of Contact Information

- a. DHS-PD ▶ 212-361-7911
- b. Employee Assistance Program ▶ 2 2-306-7660
- c. Office of Diversity & Equal Opportunity Affairs ▶ 212-361-7493

12. Active Shooter Situations

- a. Three aspects of Active Shooter \$ijuations (Run, Hide, Fight)
- b. What to do when Law Enforcement arrives

13. Conclusion (Q&A)

- a. Overview of training, and supplemental additions
- b. Workplace Violence Prevention Coordinator contact information



DHS Workplace Violence Prevention Policy Statement

The New York City Department of Homeless Services is committed to the safety and security of our employees. Workplace violence presents a serious occupational safety hazard to our agency, staff, and clients.

Workplace Violence is defined as any physical or verbal assault, or act of aggressive behavior occurring where a public employee performs any work-related duty in the course of his or her employment including but not limited to an attempt or threat, whether verbal or physical, to inflict physical injury upon an employee; any intentional display of force which would give an employee reason to fear or expect bodily harm; intentional and wrongful physical contact with a person without his or her consent that entails some injury; or stalking an employee with the intent of causing fear of material harm to the physical safety and health of such employee when such stalking has arisen through and in the course of employment.

Acts of violence against any of our employees where any work related duty is prohibited and will be thoroughly investigated and appropriate action will be taken, including involving law enforcement authorities when warranted. All employees are responsible for helping to create an environment of mutual respect for each other as well as clients and visitors, following all policies, procedures and practices, and for assisting in maintaining a safe and secure work environment.

This policy is designed to meet the requirements of New York State Labor Law Art. 2 §27-b and highlights some of the elements that are found within our Workplace Violence Prevention Program. The process involved in complying with this law includes a workplace evaluation that is designed to identify the risks of workplace violence to which our employees could be exposed. Authorized Employee Representative(s) will at a minimum be involved in:

- evaluating the physical environment
- developing the Workplace Violence Prevention Program;
- review of workplace violence incident reports at least annually to identify trends in the types of incidents reported, if any, and reviewing the effectiveness of the mitigating actions taken.

All employees will participate in the annual Workplace Violence Prevention Training Program. The goal of this policy is to promote the safety and well-being of all people in our workplace.

All incidents of violence or threatening behavior will be responded to immediately upon notification. All personnel are responsible for notifying the contact person designated below of any violent incidents, threatening behavior, including threats they have witnessed, received, or have been told that another person has witnessed or received.

If you have any questions or concerns about workplace violence, please inform your immediate supervisor or Shelter Director, or contact the Health and Safety office at:

dhshealthandsafety@dhs.nyc.gov or 212-361-7471



DIRECT CLIENT CONTACT			
Description	Location Sites	Risk Level and Factors	Control Measures
Specialized Program Facility based on needs of the population serviced. This cluster of sites were assigned as high risk locations specifically due to the clientele serviced (ie: people with mental health or substance use issues/MICA and/or Sex Offenders/SO) and/or the facility's physical layout.	Division of Adult Services: - 282 East 3rd Street - Henry Street - Ana's Place - Atlantic House - Blake Avenue - Borden Veteran Services Unit (VSU) - East Tremont - Fort Washington Armory - HELP SEC - Jack Ryan Residence - Kingsboro MICA - New Providence - Magnolia House - Myrtle - Pam's Place - Starbright Residence - Susan's Place - The Boulevard - The Renaissance - The Stadium - Tillary - WIN West	Risk Level: High Factors: Clients/Staff may have unaddressed or poorly managed substance or mental health issues or be in need of medication. Clients/Staff may become agitated, distraught or hostile. Clients/Staff may be in need of medication/psychiatrio observation/psychiatrio observation/hospitalization. Clients/Staff may become physically aggressive. Clients/Staff may have financial and/or personal problems, such as loss of income/employment, illness or loss of communication with family, difficult family relationships. Work location may be in a depressed/remote or high crime area. Other variables that may negatively impact health and safety include: Vacancies Building layout Building maintenance Security infrastructure Posting of emergency numbers	 Security is stationed at access control, screen all entrants via a metal and x-ray detector, and seize all contraband. DHS-NYPD are trained to carry batons, pepper spray and tasers and are permitted to physically engage and arrest individuals posing a threat. Building safety control measures include such items as electronic devices (keypads), alarms, dome (convex) mirrors, and surveillance cameras. DHS provides crime prevention (de-escalation and conflict resolution) and training on administering Narcan in crisis/overdose situations. Reception area available, barriers to separate clients from work area, separate interview areas, multiple exits, unobstructed office exits, door controls i.e. locks, remote buzzer, panic bars, door detector door alarms, adequate lighting in and around the workplace, parking lot well lit, panic buttons, video monitors, landscaping to provide unobstructed view of the workplace, limiting the posting of signs on window, security guards present at the location, posted at entrances, patrol the building, and are provided with communication devices. Staff are required to attend Workplace Violence Prevention training annually.

DIRECT CLIENT CONTACT			
Description	Location Sites	Risk Level and Factors	Control Measures
This cluster of facilities may include Intake/Assessment locations during which need assessments are performed to determine a site best suited for referral. The locations may also provide temporary shelter and various types of social services and referrals.	Division of Adult Services Directly Run: - 30th Street including Adult Family Intake Center (AFIC) - Bedford Atlantic Armory - Barbara Kleiman - Catherine Street - Kingsboro Star - Linden - Auburn Division of Adult Services Provider Run: - HELP Women's Center - McGuiness - Schwartz Division of Family Services: - Prevention Assistance and Temporary Housing (PATH)	Risk Level: Medium Factors: Clients/Staff may lack resources and are typically in crisis. Clients with limited English proficiency. Based on their circumstances, clients may be experiencing financial and/or personal problems (such as loss of income/employment, illness or loss of communication with family, difficult family relationships). Clients may be anxious, agitated and hostile. Uncliagnosed substance use or mental health related disorders.	 Security is stationed at access control, screen all entrants via a metal and x-ray detector, and seize all contraband. DHS-NYPD are trained to carry batons, pepper spray and tasers and are permitted to physically engage and arrest individuals posing a threat. Building safety control measures include such items as electronic devices (keypads), alarms, dome (convex) mirrors, and surveillance cameras. DHS provides crime prevention (de-escalation and conflict resolution) and training on administering Narcan in crisis/overdose situations. Reception area available, barriers to separate clients from work area, separate interview areas, multiple exits, unobstructed office exits, door controls i.e. locks, remote buzzer, panic bars, door detector door alarms, adequate lighting in and around the workplace, parking lot well lit, panic buttons, video monitors, landscaping to provide unobstructed view of the workplace, limiting the posting of signs on window, security guards present at the location, posted at entrances, patrol the building, and are provided with communication devices. Staff are required to attend Workplace Violence Prevention training annually.

DIRECT CLIENT CONTACT			
Description	Location Sites	Risk Level and Factors	Control Measures
These facilities are classified as general population shelters or shelters for individuals who receive such resources as assistance with benefits, employment, housing and various types of social services and referrals.	Division of Adult Services: - Clay Residence - Creston - HELP Clarke Thomas - HELP Keener - Park Avenue Armory - Parkview Inn - Willow - Franklin Women's Shelter Division of Family Services: - Flatlands Family Residence - Jamaica Family Residence	Factors: - Clients/Staff may lack resources and are typically in crisis. - Clients with limited English proficiency. - Based on their circumstances, clients may be experiencing financial and/or personal problems (such as loss of income/employment, illness or loss of communication with family, difficult family relationships). - Clients may be anxious, agitated and hostile. - Undiagnosed substance use and/or mental health related disorders.	 Security is stationed at access control, screen all entrants via a metal and x-ray detector, and seize all contraband. DHS-NYPD are trained to carry batons, pepper spray and tasers and are permitted to physically engage and arrest individuals posing a threat. Building safety control measures include such items as electronic devices (keypads), alarms, dome (convex) mirrors, and surveillance cameras. DHS provides crime prevention (de-escalation and conflict resolution) and training on administering Narcan in crisis/overdose situations. Reception area available, barriers to separate clients from work area, separate interview areas, multiple exits, unobstructed office exits, door controls i.e. locks, remote buzzer, panic bars, door detector door alarms, adequate lighting in and around the workplace, parking lot well lit, panic buttons, video monitors, landscaping to provide unobstructed view of the workplace, limiting the posting of signs on window, security guards present at the location, posted at entrances, patrol the building, and are provided with communication devices. Staff are required to attend Workplace Violence Prevention training annually.

ADMINISTRATIVE			
Description	Location Site	Risk Level and Factors	Control Measures
This downtown Manhattan location houses DHS' central offices, which include Operations, Programs, Security and Executive Offices.	Central Office 33 Beaver Street, Manhattan	Risk Level: Medium Factors: - Entry into the building of persons, DHS clients or members of the public, who could cause harm to building employees, and possible altercations between DHS employees. - Theft of city or personal property, and/or monetary allocations. - Several times a week clients cluster in the lobby to meet transportation for apartment viewings. - Clients come from various shelter settings to meet with the Office of the Ombudsman's on the 20th floor. - Clients, who are often accompanied by children, may be in crisis and/or angry/hostile due to the situation they may face.	 Characteristics common to both facility types (Central Office & Warehouse) include: Security is manned at reception which is initial point of contact into the facility. Staff are required to produce and openly carry their work issued photo/ID. Reception area available, separate interview areas, multiple exits, unobstructed office exits, door controls i.e. locks, remote buzzer, panic bars, door detector door alarms, adequate lighting in and around the workplace, video monitors, security guards present at the location are provided with communication devices. Building safety control measures include such items as electronic devices (keypads), alarms, dome (convex) mirrors, and surveillance cameras. Mandatory annual Workplace Violence Prevention training is required of all agency
Description	Location Site	Risk Level and Factors	staff.
This Brooklyn location houses DHS office/shelter supplies and trade staff are also assigned to this workspace.	Warehouse 101-07 Farragut Road, Brooklyn	Risk Level: Low Factors: - Minimal client/staff contact at this remote location.	

to program staff.

LOCATION TYPES. RISK LEVELS. RISK FACTORS. AND CONTROL MEASURES MOTOR VEHICLE OPERATORS (MVO)				
Description	Location Site	Risk Level and Factors	Control Measures	
Staff who transport clientele/peers by vehicle to various destinations.	Fleet Transportation (Brooklyn and Bronx)	Risk Level: Low Factors: - Clients/Staff may become agitated or hostile while in transit. - Traveling to various depressed or high crime or remote areas.	 Drivers participate in mandatory DCAS driver safety courses, receive customer service training and are held accountable for complying with the agency's code of conduct. Staff who perform field assignments are issued communication devices (cell phones, etc.) and are expected to communicate regularly with their immediate supervisor. Any and all issues encountered are elevated to the immediate supervisor for guidance/resolution. Drivers are expected to contact base after each run to disclose outcome of trip. 	
FIELD SERVICES STAFF	:			
Description	Location Site	Risk Level and Factors	Control Measures	
Includes any staff (i.e. Program Analysts, Housing Inspectors, Fraud Investigators, etc.) who perform community based service and visitation to Safe Havens/Tier II Shelters.	Community-Based	Risk Level: Low Factors: - Social services staff may encounter hostile clients and their friends/relatives/ neighbors. - Fraud investigators may encounter hostile tenants or pets. - Typical issues encountered in traveling to	 Staff are provided de-escalation training for conflict resolution purposes. All staff who work in the field are assigned agency phones and are expected to remain in contact with their supervisor throughout the shift. Any and all issues encountered are elevated to the immediate supervisor for guidance/resolution. 	
		various depressed or high crime or remote areas.	 DHS provides crime prevention, (de-escalation/conflict resolution) training 	