In accordance with the University’s commitment to the prevention of workplace violence, **CUNY SCHOOL OF LAW** adopts the following as its Workplace Violence Prevention Program (the “Program”):

1. **Purpose**

   The University’s Workplace Violence Prevention Program provides information to the College community about preventing and responding to incidents of workplace violence at the College’s worksites and facilities and seeks to develop programs which will prevent or reduce the likelihood of threats or acts of workplace violence. The Program seeks to ensure that any incident, complaint, or report of workplace violence is taken seriously and dealt with appropriately. The Program implements the Workplace Violence Prevention Policy adopted by the Board of Trustees on February 28, 2011. As set forth therein, workplace violence is defined as any physical assault or acts of aggressive behavior occurring where an employee performs any work-related duty in the course of his or her employment, including but not limited to:

   Intentional and wrongful physical contact with an employee without his or her consent that entails some injury; and

   - An attempt or threat, whether verbal or physical, to inflict physical injury upon an employee;
   - Any intentional display of force that would give an employee reason to fear or expect bodily harm;
   - Intentional and wrongful physical contact with an employee without his or her consent that entails some injury; and
   - Stalking an employee in a manner that may cause the employee to fear for his or her physical safety and health when such stalking has arisen through and in the course of employment.

2. **Scope** All College employees are required to comply with the Program. In addition, since students and visitors to the College are required to conduct themselves in conformity with existing law, employees who observe or experience students or visitors engaging in violent or threatening behavior should follow the procedures in the Program for reporting such behavior.

3. **Workplace Violence Advisory Team (“WVAT”)**
   a. The WVAT reports directly to the College President and consists of members designated by the President.
   b. The WVAT Chair, selected by the President, sets the times and agendas for meetings and establishes sub-committees, as necessary, to fulfill the WVAT responsibilities set forth herein and in sections 4, 7 and 12.
   c. The Chair and members of the WVAT and their contact information are listed in “Key Contact Information” below.
   d. The WVAT will coordinate the Workplace Violence Prevention training at the Colleges.

4. **Risk Assessments and Evaluation Process**
a. On an annual basis, the WVAT will:

i. Examine the prior year’s relevant records that concern workplace violence incidents to identify patterns in the type and cause of injuries.

ii. Assess relevant policies, work practices, and work procedures that may impact the Workplace Violence Prevention Program.

iii. Review survey responses received from employees of the College. Survey forms are available to employees on the College’s website and in hard copy at the College’s Office of Public Safety and Office of Human Resources. Completed survey forms are to be forwarded to the Director of Public Safety, as the physical site evaluation team leader.

b. The WVAT will conduct a physical site evaluation of the College’s workplace to determine the presence of factors that may place employees at risk of workplace violence. Each authorized employee representative organization with employees at the College will be given advance notice, in writing, from the Vice President for Administration of the date(s) and time(s) of the site visit(s). Each authorized employee organization may designate a representative to participate in the site visit(s) by notifying the WVAT Chair in writing of the designated representative. In addition to the authorized employee representative(s), an employee may also request to participate directly in the site visit for his/her work area by contacting the WVAT Chair. The authorized employee representative(s) will be provided with incident reports (without names) for the previous year. The authorized employee representative(s) may submit to the WVAT Chair any comments regarding situations in the workplace that pose a threat of workplace violence.

c. Following the physical site evaluation, the WVAT will prepare a report of the findings, including a list of the high risk factors identified during the physical site evaluation and recommendations on appropriate work practice control measures to address identified risk factors. The report will be submitted to the President for appropriate action. Copies of the report will be made available, upon request, to employee(s), their authorized representatives(s), and the New York State Department of Labor.

d. Physical site evaluation/risk assessment evaluations will be conducted after an incident of workplace violence, as needed and as identified by the Department of Labor, or if it is determined that a significant trend of workplace violence is identified.
THE CITY UNIVERSITY OF NEW YORK SCHOOL OF LAW  
WORKPLACE VIOLENCE PREVENTION PROGRAM- CAMPUS SPECIFIC INFORMATION

HIGH RISK LOCATIONS/RISK FACTORS BASED ON MOST RECENT PHYSICAL SITE EVALUATION AND RECOMMENDED MEASURES TO ADDRESS RISKS.

5. Risk factors/mitigations

DESCRIPTION OF RISK FACTORS

1. Employees in work cubicle stations in hallway on fourth floor can not see when people are Approaching the area from opposite ends of the hallway
2. Employees in Technical Services room in Library are not able to hear announcements through the School's emergency public address system
3. A department which occasionally handles cash transactions requested a safe
4. Fifth floor administrative area is accessible to all building occupants due to policy of keeping shared card keyed hallway doors open during regular business hours

The Law School community received Employee Workplace Violence Survey's via e-mail on December 13, 2012 and again on December 20, 2012. These e-mails were sent to all faculty, staff and adjunct faculty list serves. All employees are on at least one of those list serves. Certified letters were mailed to all representative Unions by the associate Dean of Administration and Finance on December 21, 2012 requesting their presence during the campus walk through. Unions were requested to respond to the Public Safety Director. The Public Safety Director received one e-mail response. Two thorough building walk thorough were conducted on January 11, 2013. The Public Safety Director led the walk through. Public Safety staff and a representative from Human Resources were present. The walk through was well publicized within the School and all employees were asked to voice any opinions or concerns regarding workplace safety. Employees were told that such concerns could be forwarded to the Public Safety Director, or any other member of the WVAT by any methodology. The clear consensus was that the new building was well lit, well patrolled, orderly and well protected. There have been no recorded incidents of significant violence on the Law School premises in over twenty years. The Law School employs the following policy and physical security apparatus, which assists in keeping the facility, secure.

- Security coverage and patrols 24 hours a day/365 days of the year
- Campus Security Assistants and licensed contract security staff and Peace Officers
- All Public Safety staff trained and certified in CPR/AED and basic first aid
- 72 cameras covering the interior and exterior of the building. All cameras pan tilt and zoom. All Public Safety staff able to operate system. All cameras on record mode and archive capable
- 32 emergency two-way call stations located throughout the building
- A building wide public address system. System can be operated from any School, cellular or outside land line phone with proper log in credentials
- School-owned Medeco proprietary key system
- School owned facility coded HID proximity card system
• Mobile radios with repeater signal boosters
• Four plain old telephone service lines
• OEM radios linking School to communications with Central Office and all other CUNY campuses.
• All work areas well lit and ventilated
• Bonded/armed courier service used to take large cash transactions of School premises
• Workplace Violence Advisory team as well as an operating sub group which meets to evaluate behavioral issues involving students
• Active liaison with local police precinct (108th). Community Affairs and Crime Prevention Officer conducts annual site walk-through
• Active liaison with security staff of local business interests
• Known orders of protection on file. Photos and names of persons no longer permitted on premises at Main security desk.
• Business Workflow System which ensures that identification cards of any employee no longer on payroll occurs by same day

HOW THE IDENTIFIED RISK FACTORS HAVE BEEN/ARE BEING ADDRESSED

1. School has installed dome viewing mirrors at fourth floor hallway cubicle work stations to assist Employees in seeing persons who approach their workstation.
2. School has installed additional public address speakers by the Technical Service area to assist employees in better hearing announcements through the public address system.
3. A fire-rated safe has been made available to an administrative department. It is stored in a Card-keyed room.
4. Fifth floor administrative offices will decide if they will keep their respective Hallway entrance doors closed during regular business hours

KEY CONTACT INFORMATION AND SPECIFIC CAMPUS RESOURCES

Public Safety and Security Office

Emergency 24 Hour Phone-Front Desk 718-340-4270
Emergency 24 Hour Phone-Console Room 718-340-4440
Non-Emergency 24 Hour Phone-Front Desk 718-340-4270
Non-Emergency 24 Hour Phone-Console Room 718-340-4440
Public Safety Chief-Regular Business Hours 718-340-4271

Workplace Violence Advisory Team

Steve Katz Chair 718-340-4271
Glenn Kaufhold 718-340-4530
John Whitlow 718-340-4477
Demitrios Iliou 718-340-4474
Elizabeth Johnston 718-340-4520
Johnathan Saxon 718-340-4242
Linda Penkower 718-340-4216

Accessing the Workplace Violence Prevention Program
The Workplace Violence Prevention Program Plan may be accessed in the Human Resource Office, room 5-109, during regular business hours. At other times, the plan may be accessed at the Public Safety Console room, 1-102. The plan is available on the Law School website at: www.law.cuny.edu/about/legal.html Workplace Violence Prevention Program

**Additional Campus Resources and Contacts**

<table>
<thead>
<tr>
<th>Department</th>
<th>Name</th>
<th>Phone</th>
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<tbody>
<tr>
<td>Human Resources</td>
<td>Elizabeth Johnston</td>
<td>718-340-4520</td>
</tr>
<tr>
<td>Public Safety</td>
<td>Steve Katz</td>
<td>718-340-4271</td>
</tr>
<tr>
<td>Counseling Services</td>
<td>Linda Penkower</td>
<td>718-340-4216</td>
</tr>
</tbody>
</table>

CUNY Employee Assistance Program at Corporate Counseling Associates 24-HOUR HELPLINE 800-833-8707

**Domestic Violence & Restraining Orders**

Definitions from the City University of New York (CUNY) Policy on Domestic Violence. The Policy may be accessed at:

www.cuny.edu/about/administration/offices/ohrm/policies-procedures/domestic-violence.html

For purposes of this policy, the following terms will be defined as follows.

*Domestic Violence:* A pattern of coercive tactics, which can include physical, psychological, sexual, economic and emotional abuse, perpetrated by one person against an adult intimate partner, with the goal of establishing and maintaining power and control over the victim.

*Intimate Partner:* Includes persons legally married to one another; persons formerly married to one another; persons who have a child in common, regardless of whether such persons are married or have lived together at any time; couples who live together or have lived together; or persons who are dating or who have dated in the past, including same sex couples.

*Abuser:* A person who perpetrates a pattern of coercive tactics which can include physical, psychological, sexual, economic, and emotional abuse against an adult intimate partner, with the goal of establishing and maintaining power and control over the victim.

*Victim:* The person against whom an abuser directs coercive and/or violent acts.

*Reporting:* Normally acts of domestic violence will be reported to the local police precinct, or law enforcement authority, where the victim resides when the violence occurs. However, there may be occasions where a victim of domestic violence will wait until he/she gets to work to report an incident for safety reasons. In cases where an act of domestic violence is reported or occurs at the CUNY School of Law, Public Safety officers will respond to the incident to protect the victim and maintain order. Public Safety officers will assist the victim in contacting the 108 Precincts Domestic Violence Officer.
In cases where a Law School student, faculty, or staff member is a victim of domestic violence and obtains a restraining order from any court, or any state, the victim is requested to deliver a copy of the restraining order to the Public Safety Office, room 1-102.

**Domestic Violence Assistance:**

Emergency 911
NYC Domestic Violence Hotline 800-621-4673
NYS Domestic Violence Hotline 800-942-6906
NYC Crime Victims Hotline 212-577-7777
Center Against Domestic Violence 718-439-1000 (English, Spanish, French)
National Domestic Violence Hotline 800-799-7233

**Domestic Violence Prevention Resources**

<table>
<thead>
<tr>
<th>Human Resources</th>
<th>Elizabeth Johnston</th>
<th>5-109E</th>
<th>718-340-4520</th>
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<tr>
<td>Human Resources</td>
<td>Diana Kunkel</td>
<td>5-109D</td>
<td>718-340-4225</td>
</tr>
<tr>
<td>Public Safety</td>
<td>Steve Katz</td>
<td>4-303</td>
<td>718-340-4271</td>
</tr>
<tr>
<td>Counseling</td>
<td>Linda Penkower</td>
<td>4-201</td>
<td>718-340-4216</td>
</tr>
</tbody>
</table>

Safe Horizons NYC Domestic Violence Hotline 800-621-4673
NYC Domestic Violence Hotline (English) 800-942-6906
NYC Domestic Violence Hotline (Spanish) 800-942-6908
NYC Rape Hotline 212-227-3000
NYPD Crisis Hotline 212-267-7273
Brooklyn Criminal Court 718-643-4044
Brooklyn Family Court 718-643-2650
Bronx Criminal Court 718-590-2000
Bronx Family Court 718-590-3319
Manhattan Criminal Court 212-374-4984
Manhattan Family Court 212-386-5170
Queens Criminal Court 718-520-3469
Queens Family Court 718-298-0197
Staten Island Criminal Court 718-390-8400
Staten Island Family Court 718-390-5460
VINE (Victim Information Notification Everyday) 888-VIN-E4NY

VINE is a 24 hour automated hotline that provides victims with the release date of inmates that are in the custody of the New York City or State Department of Correction prison system.

New York State Office for the Prevention of Domestic Violence 800-942-6908
http://www.labor.ny.gov/workerprotection/safetyhealth/Links/NYS%20OPDV%20-%20Home.mht
If you have questions about the information provided in our Campus Workplace Violence Prevention Training, please contact one of the following representatives:

Steve Katz, Public Safety Chief  
718-340-4271  katz@mail.law.cuny.edu  24 Hours via emergency phone contacts

Elizabeth Johnston, Human Resource Director  
718-340-4520  elizabeth.johnston@law.cuny.edu  regular business hours

6. **Employee Information and Training**

   All employees must participate in training on the risks of workplace violence in their workplace at the time of initial employment and at least annually thereafter as provided by the Office of Human Resource Management-Central Office. The employee training and information program includes information regarding how to locate the Policy and Program as well as survey forms.

   The College provides training to its employees. The training program addresses the following essential topics:

   a. An overview and definition of workplace violence;
   b. The College’s commitment to providing a safe workplace;
   c. Instructions regarding how to obtain a copy of the written Policy and Program;
   d. A listing of significant identified risk factors;
   e. Techniques on how to recognize and avoid potentially violent situations, including de-escalation techniques;
   f. How employees can protect themselves and how employees can suggest improvements to the Program;
   g. The importance of reporting incidents and how to report such incidents;
   h. Where employees can seek assistance during a dangerous situation; and
   i. Resources, such as trauma counseling, that may be available to employees after an incident has occurred.

Additional training will be conducted as necessary and as determined by the needs of the College.

7. **Reporting Process/Procedures to Report Incidents of Workplace Violence**

   In order to maintain a safe working environment, incidents of workplace violence must be reported promptly to a supervisor and/or the Office of Public Safety. The phone number of the College’s Office of Public Safety is **718-340-4270**. Members of the College community are also encouraged to report other behavior they believe may lead to potential workplace violence. After an incident occurs or upon receipt of a complaint, an investigation will be conducted by the Office of
Public Safety. The Office of Human Resources will investigate complaints involving the Office of Public Safety.

a. The College will use a form developed by the University’s Office of Public Safety to record incidents of workplace violence. As set forth therein, investigative reports must include:

i. Workplace location where the incident occurred;

ii. Time of day/shift when the incident occurred;

iii. A detailed description of the incident, including events leading up to the incident and how the incident ended;

iv. Names and job titles of employees involved;

v. Name or other identifier of other individual(s) involved;

vi. Nature and extent of injuries arising from the incident; and

vii. Names of witnesses.

b. The WVAT reviews the investigation results of incidents and complaints, determines whether there is a violation of the Policy and provides a report to the President.

c. The WVAT, with the participation of the authorized employee representative(s), conducts a review of the Campus Workplace Violence Incidents Report at least annually to identify trends in the types of incidents in the workplace and reviews the effectiveness of the mitigating actions taken.

8. Confidentiality of Certain Information

Nothing in this Program requires the disclosure to any person or entity of information otherwise kept confidential for security reasons, such as information that if disclosed may:

i. Interfere with law enforcement investigations or judicial proceedings;

ii. Deprive a person of the right to a fair trial or impartial adjudication;

iii. Identify a confidential source or disclose confidential information relating to a criminal investigation;

iv. Reveal criminal investigative techniques or procedures, except routine techniques and procedures; or

v. Endanger the life or safety of any person.
9. **Report of Violations of the Workplace Violence Prevention Policy and Program**

Any employee or authorized employee representative who believes that the College’s Workplace Violence Prevention Program is in violation of CUNY’s Workplace Violence Prevention Policy or that a threat of imminent danger exists that is not being adequately addressed should bring such exigent concerns to the attention of the University’s Senior University Executive Director of Human Resources Strategic Planning, 217 East 42nd Street, New York, NY 10017.

10. **Retaliation**

No employee is subject to criticism, reprisal, retaliation or disciplinary action by the College for good faith reporting pursuant to the Program. Individuals who make false and malicious complaints of workplace violence, as opposed to complaints that, even if erroneous, are made in good faith, may be subject to disciplinary or other appropriate action.

11. **Recordkeeping**

All recordkeeping and reporting shall be made in compliance with the applicable law and regulation (currently New York Labor Law Sections 27-a and 27-b and 12 NYCRR Part 800) and the Policy and Program.

12. **Program Effectiveness and Evaluation/Post-Incident Response**

At least annually or after serious incidents, the WVAT evaluates the effectiveness of the Workplace Violence Prevention Program, including post-incident responses and evaluation processes. The review focuses on incident trends and the effectiveness of the control measures taken by the College. The review also assesses whether the reporting and recordkeeping systems are effective in collecting relevant information.