



BOARD ADMINISTRATIVE PROCEDURE	
ADMINISTRATIVE PROCEDURE <b>Supporting Positive Student Behaviour: Safety for All</b>	ADMINISTRATIVE PROCEDURE NUMBER <b>(NEW) 912 (OLD) 804 &amp; 407</b>
Directional Policy <b>900</b>	

**TITLE OF ADMINISTRATIVE PROCEDURE:**  
Supporting Positive Student Behaviour: Safety for All

**DATE APPROVED:**  
January, 2018

**PROJECTED REVIEW DATE:**  
2022

**DIRECTIONAL POLICY ALIGNMENT:** Safe and Accepting Schools



## Strategic Priorities 2017-2020

### Vision

Achieving Excellence in Catholic Education  
LEARN • LEAD • SERVE

### Mission

To educate students in faith-filled, safe, inclusive Catholic learning communities by nurturing the mind, body and spirit of all.

#### LEARN

Achieve excellence in instruction and assessment to enable all students to become reflective, self-directed, lifelong learners.

#### LEAD

Foster critical thinking, creativity, collaboration, and communication, to enable all students to realize their God-given potential.

#### SERVE

Inspire engagement and commitment to stewardship for creation to enable all students to become caring and responsible citizens.

### ACTION REQUIRED:

The Peterborough, Victoria, Northumberland and Clarington Catholic District School Board believes that students are best served in classrooms that have caring and safe climates, with supportive and planned responses to address academic, social/emotional, and developmental behavioural and safety needs.

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There are some students who have a current pattern of unsafe and possibly injurious behaviour, and who present a risk of injury to themselves, other students, and/or those who support them. Some students require instruction and support to develop self-regulation and strategies to manage their behaviour and maintain safety. For most of these students, well-planned prevention and safety intervention strategies, and an ongoing review of programs, will significantly reduce or eliminate unsafe behaviours and the risk of injury.

This administrative procedure outlines a process to follow when a student demonstrates unsafe behaviours. Everyone has the right to work and learn in a safe environment. A safe, inclusive and accepting school environment is essential for student and staff well-being and achievement. Principals are expected to ensure a caring and safe school environment for all, while responding to the student's right to an appropriate education. The administrative procedures in this document assist school principals with meeting the safety and behavioural needs of all students, while ensuring the safety of all.

## **Guidelines:**

### **1. *Staff and Student Safety: Positive Behaviour Supports***

Progressive discipline requires that positive behaviour supports be used as an approach to working with challenging behaviours. Using positive behaviour supports implies that staff:

- Understand and support students in their behaviour change process by utilizing specific teaching strategies, e.g. Applied Behavioural Analysis strategies, personalized self-regulation plans, Restorative Practices, etc.;
- Apply a methodical approach of observation and data collection;
- Analyze the relationship between the behaviour and the context to determine the motivation behind (i.e. function of) the behaviour;
- Attempt to discern the antecedents of the behaviour, and potential triggers;
- Analyze the stressors impacting on the student across the 5 domains of regulation (biological, emotional, cognitive, social and pro-social);
- Reduce potential triggers and overall stress load on the student in the environment in certain settings and during certain events; and,
- Model, teach and support the student to adopt alternative behaviours that are more socially acceptable.

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The following are integral components of a positive behaviour support approach:

a) Behaviour Data Tracking

A behaviour data tracking tool is one in which entries can be made quickly, yet one that provides enough information for evaluation and improvement of the student's program. Tracking tools should contain basic information, such as the date and time of the incident, an analysis of the student's overall stress load, the antecedent (what occurred immediately before the behaviour), a brief description of the behaviour, the duration of the behaviour, the intervention used, who was involved, and the consequence(s) of the behaviour (what occurred immediately after the behaviour).

The principal will ensure that accurate and up-to-date behaviour data tracking is maintained and analyzed. Behaviour data tracking is to be considered during a review/debrief after a reported incident on the Violent Incident Form 17 (see Appendix A), during each reporting cycle and whenever the Individual Education Plan (IEP), if applicable, is updated. Behaviour data tracking is essential in determining appropriate student programming (including IEPs, support staff allocation, Safety Support Plans) and staff Safety Support Planning.

b) Safety Support Plan

The Safety Support Plan (see Appendix Ca) is a response plan developed for students whose unsafe behaviour presents a risk of injury to self and/or others. Principals are responsible for ensuring that Safety Support Plans are data-driven, realistic, developed collaboratively with school staff members, and that consultation with parents/guardians/caregivers occurs as part of the process. Consultation can also include Board professional staff, and external professionals and/or agencies involved with the child, where appropriate, and where consent has been obtained. However, final decisions on IEPs, Safety Support Plans, and school procedures remain the responsibility of the school principal to ensure implementation.

When a Safety Support Plan is first developed for a student, the school personnel should ensure that the Safety Support Plan information is updated in SEOS on Form 32a (see Appendix Ca). While Safety Support Plans are unique for each student, they generally include the following information:

- a description of the observable behaviour concern(s);
- a description of the student's unique stressors, triggers or antecedents (what happens immediately prior to the challenging behaviour);
- prevention and intervention strategies;
- management of behaviour/staff safety responses;

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- communication procedures for all staff;
  - necessary Personal Protective Equipment (PPE).

Initiated by the principal, existing Safety Support Plans are to be reviewed at a minimum once in each term/semester, and concurrently with a student's IEP, if applicable. Safety Support Plans are working documents, to be revised as necessary. A Safety Support Plan should be reviewed and updated when there is a change in behaviour that could increase the potential for violence, and when there is a violent incident involving a student. If a staff member working with the student, or the parent/guardian feels that the student's Safety Support Plan needs to be reviewed, he/she may bring that request to their principal/vice-principal's attention at any time. It is the principal's responsibility to address safety concerns in the workplace, on behalf of the Board.

Parent(s)/guardian(s) will be consulted during the creation and/or review of the Safety Support Plan and/or if updates are considered during the school year. All staff members who work regularly with the student will be involved in the development and/or review of the Safety Support Plan.

Safety Support Plans are no longer required where the school team has evidence that the unsafe behaviours no longer exist. The evidence would show a period of time, to be determined by the school team, without any incident of unsafe behaviour with the potential to cause a risk of injury to self and/or others, as outlined in the Safety Support Plan. This decision is supported by the behaviour data tracking. Parents/Guardians will be consulted regarding the removal of a Safety Support Plan. When a Safety Support Plan is no longer required, school personnel should update the information in SEOS on Form 32a. While consultation is required, whether or not staff or parents may agree, ultimately, it is the principal's decision to initiate or remove a Safety Support Plan.

## **2. *Assessment of Risk***

When a staff member at a school identifies unsafe student behaviours that are likely to cause a risk of injury, the following process will be followed:

- The staff member communicates the details of the behaviours to the school principal or vice principal;
- If the identified behaviour meets the definition of workplace violence under Administrative Procedure 509: Workplace Violence Prevention, then the employee will complete and file a Workplace Violence Incident Form (see Appendix F);
- The principal arranges for a meeting to discuss these behaviours. The meeting should include a review of any OSR documentation, including the IEP, if applicable, and relevant assessments that may support understanding of the nature and causes of the behaviour. The action items resulting from this meeting

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will include procedures for staff members to summon assistance, including alternate arrangements if the first contact is not available, as well as other measures that may reduce the incidents of unsafe behaviours. Some form of behaviour tracking will also be put in place after this meeting. When a meeting cannot be scheduled promptly, the principal should organize and communicate procedures for staff members to summon assistance as well as other measures that may reduce the behaviours;

- The meeting should also identify positive behaviour supports, including strategies to promote self-regulation skills, which may be outlined in the Safety Support Plan and/or IEP;
- Where the behaviour causing a potential risk-of-injury is of significant frequency or intensity, the principal may determine that a formal Safety Support Plan needs to be put in place immediately. The procedures for communication to staff will also need to be put into place following completion of the Safety Support Plan;
- A safety audit of the classroom and school environment (see Appendix J) may be conducted as part of, or after, this meeting;
- A referral for central special education support may also be sought after the meeting, as per the PVNC Intervention Checklist (see Appendix K);
- A follow-up meeting will be scheduled. This meeting will review the behaviour tracking data as well as the impact of any positive behaviour supports;
- The principal may determine that a Safety Support Plan is not required at that time, but that the staff supports, positive behaviour supports and continued behaviour tracking are sufficient;
- In the case of a risk to safety, the principal will consider whether a Violent Threat Risk Assessment (VTRA), is appropriate, and if necessary, consult with the Superintendent of Schools, as per the [PVNCCDSB VTRA protocol](#);
- Meeting minutes will be recorded on Case Conference SEOS Form #4 (see Appendix H).

Where a Safety Support Plan is in place, the level of risk will be reviewed on an ongoing basis, and at a minimum once each term, by appropriate staff to determine if prevention and intervention strategies are working.

During the assessment of risk and as part of the ongoing review, the school team (e.g. principal, SERT, classroom teacher, EA) will consider the following:

- A review of existing medical/neurological/developmental professional assessment information by appropriate professionals (e.g. physicians, psychology, social work, speech-language pathology, occupational therapy, physical therapy), where available;
- Whether the unsafe behaviour(s) is/are a manifestation of an identified exceptionality or diagnosed medical condition;
- A review of the current IEP, if applicable, with respect to appropriate programming and accommodations;

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- A review of the Safety Support Plan as needed with respect to appropriate intervention and emergency response procedures;
  - A review of current in-school staffing needs to ensure a caring and safe school environment for students and staff (this includes the staff training required (e.g. BMS training, ABA strategies, self-regulation skills), along with an analysis whether available staff can safely carry out the necessary interventions);
  - A safety audit (Appendix J) of the classroom and school environment, which also considers self-regulation supports;
  - A review of the protective and/or safety equipment required to ensure a safe working environment for the students and staff;
  - A review of community agency support for the student and family, or the need for parent/guardian referral assistance in obtaining support.

### **3. Confidentiality and Safety**

Education programs and services are subject to the provisions of privacy legislation including, but not limited to, the Education Act, Municipal Freedom of Information and Privacy Protection Act (MFIPPA), the Child and Family Services Act (CFSA) and the Personal Health and Information Protection Act (PHIPA). Student information, including programs, services, and supports is private and confidential. That may include, but is not limited to, discussions, correspondence, and meeting notes for students whose unsafe behaviours may present a risk of injury. Staff are required to obtain appropriate informed consent prior to sharing this information.

In the event that there is a risk of workplace violence from a person/student with a history of violence, disclosure of information may be necessary to assist in preventing incidents where there is potential for injury. In this situation a principal will share pertinent personal information with affected workers without informed consent. This may include providing them with a copy of the pertinent student Safety Support Plans. These plans are to be kept confidential, and in a secure location at all times. The Ontario Occupational Health and Safety Act (OHSA), Section 25(2)(A), states that, “an employer shall provide information, instruction and supervision to a worker to protect the health and safety of the worker” and shall, “advise a worker of the existence of any potential or

actual danger to the health and safety of a worker of which a supervisor is aware”. Further to that, in compliance with OHSA (Section 32.0.5 (4), the supervisor shall not disclose more personal information than is reasonably necessary to protect the worker from injury.

#### a) Work Experience

Students benefit from various forms of experiential learning opportunities, including work experience, cooperative education, and school-work transitions. Experiential learning programs provide all students, including those with special

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education needs, a valuable opportunity to complement academic programming and are a valuable component of a student's comprehensive education and career/life planning program regardless of their post-secondary destination. With regard to potential safety concerns, the employer and/or supervisor will be made aware of the student's behaviour needs prior to the start of the placement. In all cases, disclosure of a student's personal information shall be limited and narrow to fulfill the stated purpose. In cases where there is a concern of sharing personal information with a student's employer and/or supervisor, school staff should consult with their principal and/or Family of Schools superintendent, as well as obtain parent/guardian consent permitting the sharing of personal information, prior to the start of the placement.

b) Transportation

Students, including those that could present a risk of injury to self and/or others, may be provided with transportation to and from school and/or as part of their academic program. With regard to potential safety concerns while being transported, the transportation provider, such as the Student Transportation Services of Central Ontario (STSCO) or the Trillium Lakelands District School Board in the City of Kawartha Lakes, will be made aware of the student's behaviour needs and/or safety requirements to reduce the risk of injury to self and/or others prior to the service being provided. In all cases, disclosure of a student's personal information shall be limited and narrow to fulfill the stated purpose. The school staff will obtain parent/guardian consent permitting the sharing of personal information, prior to transportation being provided. If parents refuse to share this information, then transportation may be withheld.

c) Childcare Centres in Schools

Students, including those who could present a risk of injury to self and/or others, may attend a before- or after-school childcare program which is housed in the school building. There could be important information about the student's activities and experiences which would be beneficial to share between the settings in the interests of safety. The school and the childcare will obtain parent/guardian consent permitting the sharing of personal information about the child in the other setting.

**4. Admission of Students with a Current Pattern of Unsafe Behaviour**

a) From Another School Within PVNCCDSB

Ongoing, comprehensive behaviour and risk of injury management is part of the student transition process, and involves collaboration among school and board professionals, along with parents/guardians and community professionals. It is essential that information about students whose unsafe behaviours pose a safety risk, be responsibly shared between administrators of sending and receiving

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schools/programs. When the sending PVNC principal is aware that a student with a history of unsafe behaviour is moving to another PVNC school, it is imperative that the principal of the sending school alert the principal of the receiving school before the student arrives at the new school. The receiving principal will then share the information on these behaviours with those staff who might be interacting with the student. When a student arrives to be registered from another school in the board, schools may contact the previous school to discern if the student had any unsafe behaviours that posed a risk of injury. If the student was on a Safety Support Plan in the sending school, this plan should continue at the receiving school, with appropriate modifications, until it is determined that the plan is no longer necessary.

b) From Outside of the Board

When a student is registering to attend a PVNCCDSB school (whether from another board, a specialized program, or is beginning school for the first time), the principal has the right to request to communicate with the previous school's administration and/or external agencies involved with the student. Permission is granted for this communication with the previous school through the parent signature on the [PVNCCDSB registration form](#). Successful and timely entry into the school is dependent upon the receipt of all relevant information to plan the student's program. Once the principal is aware of any behaviour needs which could impact safety, entry procedures include, but are not limited to, the following:

- The principal or designate asks parents to complete a registration form;
- The student does not begin in the classroom until the principal or designate initiates an intake meeting, which involves parents and relevant PVNCCDSB central staff, such as the Special Education Consultant, and possibly external agency personnel;
- Understanding that the request for the OSR occurs after enrolment, and that OSRs do not always arrive in a timely manner, efforts should be made to gather information from the OSR to include, where available:
  - Documentation on current/existing health information, including diagnoses and medications;
  - Current behaviour tracking, Safety Support Plan, IEP, if applicable;
  - Previous Safe Schools reporting forms (suspension, expulsion, violent incidents);
  - Current support staff allocation, if applicable;
  - Current/existing assessment information from professional staff (e.g., psychology, social work, speech/language, attendance, physiotherapy, occupational therapy, Intensive Behavioural Intervention (IBI)/Applied Behaviour Analysis (ABA) providers);
  - Current/existing assessment information from involved community agencies/services;



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- Identification Placement and Review Committee (IPRC) decision information, including a history of the student's strengths and needs, if applicable;
  - Parent/guardian interventions and prevention strategies;
  - A current safety audit (Appendix J) of the new board classroom and school environment which also includes self-regulation supports;
  - Information regarding progressive discipline or probation/police, as appropriate.
  - Actions may include, but are not limited to:
    - Completing a School Entry Form #37 (see Appendix D);
    - Conducting a Violent Threat Risk Assessment (VTRA);
    - Communicating the entry timeline to staff and parents/guardians. Entry may be reasonably delayed until a Safety Support Plan is completed and staff is made aware of the contents of the Safety Support Plan;
    - Informing all relevant staff of the level of risk;
    - Identifying staff needs (qualifications, training, and equipment requirements) to ensure a safe school environment;
    - Identifying alternative measures to be implemented in case of staff absence;
    - Designating the staff who are to be involved in revising/preparing the Safety Support Plan (will include the classroom teacher and support staff, if applicable);
    - Involving community agencies/services during the entry process (pre-observation, consultation, transition supports, and follow-up);
    - Identifying which additional Board services, if any, could be provided or recommended to the family;
    - Identifying needed community agency/service supports (if not already present) for the student/family during the referral process.

If a principal from another school board is requesting information about a student who was formerly enrolled in a PVNC school, and that information would not reside in the student's OSR, then consent from the student's parents, or the student if over the age of 18, will be obtained.

### **5. Notification of Risk of Injury**

The Occupational Health and Safety Act requires that employers inform workers of any hazard in the workplace (OHS Act, 1990, 25(2) (d), 32.0.5). The Ministry of Labour, Occupational Health and Safety, in its interpretation of this clause, has included risk of injury from students with a history of unsafe behaviour. Accordingly, school principals

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will ensure that all employees who have regular contact with students with a current history of unsafe behaviour in school are informed of any risk of injury when interacting with these students prior to working with the student. The duty to inform employees is limited and applies only when: (a) the employee can be expected to encounter the person in the course of his or her work; and (b) the risk is likely to expose the employee to injury.

Accordingly, principals will ensure that appropriate Safety Support Plans are in place and implemented. The principal will also ensure that staff is informed of any student whose unsafe behaviours present a risk of injury to staff or other students, and that staff are informed of all safety strategies and interventions that are in place or are to be implemented. Staff will be informed that they must report concerns of unsafe student behaviour to the principal.

Others who are likely to encounter a student whose unsafe behaviour could cause a risk of injury, such as central PVNCCDSB staff, parent volunteers, etc., should also be provided with the necessary information and instruction, as appropriate. The recipients of this information will keep it confidential.

#### ***6. When an Employee is Threatened, Put at Risk of Injury, or Injured***

When an employee is threatened, put at risk of injury, or injured, the following procedures will occur:

- The employee will summon immediate assistance if required;
- The employee will report the circumstances to his or her supervisor and notify the principal immediately;
- An Employee Incident/Injury Report Form 5 (see Appendix E) will be used to document the circumstances of any harm caused by a student. It will be signed by the employee and sent to Human Resource Services within 24 hours;
- If the incident is violent in nature, the employee will also complete a PVNC Workplace Violence Incident Form 31 (see Appendix F) , and submit to the principal, as well as a Safe Schools Form (see Appendix B), and submit it to the principal;
- The principal will assist the employee who has been subject to aggressive or violent behaviour in seeking medical intervention and will report to the area;
- The principal will investigate the circumstances, mitigating and otherwise, surrounding the incident and inform Human Resource Services if any injury occurs. Based on the findings of the investigation, the principal will determine the appropriate response, including actions to prevent a recurrence;
- The principal will hold a post-incident debrief (see Appendix G) with all staff involved as soon as possible after the incident. The principal will decide the most appropriate time to hold the debrief;

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- If there has been a violent incident, the principal will ensure that Violent Incident Form 17, is completed, copied appropriately, and stored in the student's OSR;
  - If a physical intervention has been used, school staff will, within 24 hours, attempt to contact the parent/guardian, and will complete the Physical Intervention Report Form 32c (see Appendix Cc), in collaboration with the principal;
  - The Human Resources (HR) Department will notify PVNC's Multi-site Joint Health and Safety Committee if Form 5's or Form 31's are submitted to HR;
  - A Safety Support Plan will be developed (if not already in place) if behaviours need more extensive interventions. Central staff will be consulted, as appropriate;
  - Any staff member or parent/guardian who feels that an aggressive or violent incident has not been addressed effectively may request a review by the Family of Schools Superintendent;
  - The principal will make staff aware of resources for support including the Employee Family Assistance Plan (EFAP) and services that can be provided by PVNCCDSB's Staff Wellness Coordinator.

## **7. Staff Absences**

Prior planning for staff absences with the regular school staff is essential, particularly when it has implications for staff working with students who have behaviour needs. Occasional teachers, Special Education Support Staff (SESS), Registered Early Childhood Educators (RECEs), Teachers in Charge (TICs) and other staff will receive plans for their assignment as written and left by those whom they are replacing. These documents contain, where applicable, copies of IEPs, Safety Support Plans, and a list of students who have Safety Support Plans with whom the occasional staff member may work.

Principals will develop contingency plans with staff for those situations in which occasional employees are not available. This planning should be done before the student begins a program and will include alternative safety measures to be implemented in case of staff absence. Alternatives could include temporary reassignment of existing site staff, or temporarily placing the student in another classroom or safe location in the school. In planning for these situations it would be advisable that (where possible) students who are requiring contingency plans have opportunities to interact with those staff members in the school who are part of the contingency plan, prior to enacting the plan. Contingency plans may be communicated to parents of those students who require more intensive support, as appropriate. Support Staff will maintain up-to-date emergency supply plans to be kept in a central location, such as the Main Office or the Resource Room, if applicable.

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## **8. Personal Protective Equipment (PPE)**

The Occupational Health and Safety Act (OHSA) and Education Act requires that the PVNCCDSB, as an employer, assess risk to personal safety regularly and respond to reduce the risk for all students and staff. The OHSA requires that, where safety risks can be eliminated or reduced through the use or wearing of PPE, this equipment will be provided to, and used by, staff, including occasional staff. PPE is used in conjunction with, not in place of, the implementation and teaching of social-emotional and self regulation skills and/or behaviour management strategies, as part of a Safety Support Plan and possibly an IEP.

The need for PPE will be determined collaboratively by the school team and central staff. When the school principal, through discussion with the staff who support a student and through examination of the behaviour tracking data, believes that the student's behaviours present a risk of injury that could be mitigated through the use of PPE, a request should be made to the Supervisor of Special Education Support Staff, who will then communicate with the Health and Safety Officer. If the student has special needs, then the Special Education Consultant for the school should be made aware of the request, as part of the Intervention Checklist.

As part of the ongoing consultation process, parents/guardians will be informed when PPE is going to be accessed as a safety measure. If requested, parents/guardians will be shown the equipment and understand the purpose and circumstances in which it is being accessed.

The use of PPE will be documented on Personal Protective Equipment and Staff Safety Support Plan Form 60 (see Appendix I), and attached to the student Safety Support Plan. The form indicates when the equipment needs to be worn or accessed. In some cases, the expectation will be that the equipment must be worn at all times. While it is preferable that PPE is only accessed when necessary, considerations such as the potential for injury and the ability to access equipment during an escalated situation are also important.

When PPE is accessed to lessen the potential risk-of-injury, its ongoing use will be monitored through behaviour data tracking in order to discern the continued need for the equipment.

## **9. Physical Intervention with Students**

### **a) Training**

The use of physical intervention on the part of appropriately trained staff may be required to protect students or themselves from behaviours which could cause injury. The principal will ensure that staff members assigned to work with

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students who present an ongoing risk of injury to self and/or others are adequately prepared for the assignment. Adequate preparation includes awareness of the unique behavioural needs of specific exceptionalities and diagnoses, training in prevention and intervention, and professional knowledge regarding the preparation of Safety Support Plans and IEPs. The Special Education Department staff can support schools in this training and support.

Staff members who work on a regular basis with students whose unsafe behaviours present a risk of injury to themselves or others are required by PVNCCDSB to have up-to-date training in managing behaviours that present the risk of injury; BMS Training is the current PVNCCDSB-approved safety training. It focuses on the identification and prevention of behaviours that can escalate into crisis and the teaching of non-verbal, verbal, and physical intervention techniques that will enable staff to effectively defuse escalating behaviours. BMS recertification occurs on an annual basis. Staff who have received BMS Training will respond to escalating or violent student behaviour by using the safest and least intrusive interventions before proceeding to more intrusive and physical interventions as the situation requires.

Where the above referenced staff members do not have qualifications in the current board-approved safety training (i.e. BMS), the principal is to arrange for training on the next available training session, or earlier, if necessary. The Superintendent of Learning - Special Education should be contacted if ongoing risk of injury management strategies identify that further student-specific training is required or when training should occur prior to the next available training date.

b) Planning

Details involved in the use of planned physical intervention with a student will be identified in the student's Physical Intervention Plan (SEOS Form 32b - see Appendix Cb). A Safety Support Plan that includes planned physical intervention will outline the following details/ procedures:

- indicators that the student's unsafe behaviour presents an imminent safety risk and that physical intervention is required;
- who will assist in containing the student;
- a contingency plan for staff absences;
- containment techniques to be used, following BMS protocols;
- safety/protective equipment needed;
- how the student's condition will be monitored;
- how it will be determined when to discontinue the physical intervention;
- communication with school administration.

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Employees of the Board are not required to intervene in any situation if intervention would cause immediate physical harm to himself or herself or to a student or another person. This eventuality needs to be specifically addressed in the student's Safety Support Plan.

Under the Occupational Health and Safety Act (OHSA), workers have a right to refuse work or do particular work where the worker has reason to believe that workplace violence is likely to endanger themselves. However, *Regulation 857 - Teachers*, made under the OHSA, states that this right does not apply to teachers, where the circumstances are such that the life, health or safety of a student is in imminent jeopardy. However, the Board needs to take every reasonable precaution under the circumstances to protect the health and safety of the teacher.

### **10. School Safety Audit for Supporting Positive Student Behaviour**

As part of ongoing safety management in the school, the principal will conduct a classroom and school safety audit, using the School Safety Audit Checklist for Supporting Positive Student Behaviour (see Appendix J), which includes a review of self-regulation supports, specific to the needs of students with unsafe behaviours. Potential threats to the student's own safety, or to others in the general school environment and school yard, need to be identified by staff, and precautionary procedures established. As unsafe behaviours emerge, safety audits would occur more frequently in order to address potential safety concerns in a timely manner.

### **11. Use of designated self-regulation spaces outside of the classroom**

Self-regulation strategies in the classroom that support a variety of regulation needs, that assist students to remain in their regular classroom, should be the first approach. These strategies are best employed as part of a systematic and comprehensive program to support a safe and caring classroom environment. Where these in-class strategies are not entirely successful or where they need to be supplemented, the focus moves to providing the student with opportunities to self-regulate through activities outside of the classroom, connecting with a preferred adult, performing physical tasks or moving to a different classroom or other learning space. The student should be supervised during these activities. Only after these strategies have been attempted and the behaviour tracking demonstrates that they are not entirely successful should a designated self-regulation space outside of the classroom be considered as a part of a self-regulation strategy.

The use of a designated self-regulation space outside of the classroom is based on the concept of reducing environmental and body triggers, as well as stressors, as a coping strategy for students in elevated and/or depressed emotional states of arousal. The

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main purpose of the area is to support the student in the implementation of self-regulation strategies, resulting in the reduction of challenging behaviours. The space may contain materials to assist the student in regulating methods (e.g. fidget toys, visual supports that provide options/instructions, mats for reclining, calming music, etc.). A student in a designated self-regulation space outside of the classroom must be supervised by a staff member at all times.

The Safety Support Plan should state when and for what purpose the designated self-regulation space outside of the classroom will be used by the student. The parent/guardian should be informed and agree to the use of the designated self-regulation space for the student; further, they should be given the opportunity to see the space if requested.

The use of a designated self-regulation space outside of the classroom is not necessarily a long-term strategy and needs to be re-evaluated when the Safety Support Plan is reviewed at a minimum. If the student has an IEP, it should be re-evaluated as a strategy each time that the IEP is reviewed, which is minimally once in each term/semester. The school team, in consultation with the parents, should consider the amount of time the student uses the space, the impact on other learning goals, the impact on social interaction and, where a student is transitioning to a different placement, possible lack of access to these spaces in other environments.

## **12. Calling 9-1-1**

Calling 9-1-1 for professional assistance by police and/or emergency medical services is always a viable option in an emergency situation, and will be given first consideration where the unsafe behaviour(s) and/or physical attributes of the student present a significant risk of injury to self and/or others, such that BMS techniques cannot alleviate the risk of injury.

The principal may choose to share information with the school's Community Police Liaison Officer to reduce the potential risk-of-injury, in order to proactively identify and outline additional supports the police are prepared and able to offer, with respect to implementing violence-prevention strategies in the school. In all cases, disclosure of information shall be limited to fulfill the stated purpose. Principals shall consult with the Joint Police School Board Protocol, and possibly with their respective Family of Schools superintendents, when considering what personal information should be released to law enforcement officials.

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### **13. Debriefing Incidents**

BMS protocol states that debriefing incidents where there was a significant safety risk serves both as an immediate response and as a component in developing new prevention/intervention strategies.

All unsafe behaviour incidents involving students place considerable stress on staff and students. A debrief allows those involved to express their reactions, become aware of school and board-based supports, what worked well, what could be improved, and the subsequent next steps as a school team. Those involved in the incident can make the decision to have a debrief as a team.

Post-incident staff debriefing is most effective when:

- It is scheduled as soon as possible following the incident;
- There is a facilitator who can remain objective;
- Confidentiality is respected among team members and in the extent of information shared;
- Everyone is allowed to talk about what happened and how they felt during and after the incident;
- Everyone is informed about what is happening with the student involved (consequences/follow-up actions);
- Feelings are validated (each person's experience is unique and normal);
- There is no judgement/no criticism of actions or emotions (not a sign of weakness or incompetence);
- There are no platitudes (cliché statements such as "it's not worth worrying about", "you'll feel better tomorrow", etc.);
- Counselling is left to the professionals;
- Additional help is discussed (Board professionals, Employee Family Assistance Program (EFAP));
- Individual strengths are recognized.

Principals can refer to the Post-incident Staff Debrief Form (see Appendix G) at the time of the debrief for guidance. Information includes who was involved, the nature of the interventions, a description of the incident, an analysis of what worked well, and suggestions for next steps.

### **14. Students with Special Needs**

Principals are responsible for ensuring that IEPs, behaviour data tracking tools, and Safety Support Plans are developed collaboratively by all school staff involved with a student with special needs, and that consultation with centrally-based special education



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staff and outside agencies is included in the process where appropriate. Parents/guardians shall be consulted in these processes under the Education Act.

The Ministry of Education's [\*Caring and Safe Schools in Ontario\*](#), 2010 document outlines specific conditions and other factors affecting behaviour in order to help educators better understand their students' needs. From a progressive discipline perspective, this information is important in promoting positive behaviour and in addressing inappropriate behaviour. "Where the nature and severity of student behaviour point to the need for suspension, consideration of mitigating circumstances and other factors is mandatory. If a decision in favour of suspension is ultimately made, mitigating circumstances and other factors must also be taken into account in determining the duration of the suspension." (p.50)

Mitigating circumstances applicable to the student when considering progressive discipline are:

- The student does not have the ability to control his or her behaviour (as a function of a medical condition, for example).
- The student does not have the ability to understand the foreseeable consequences of his or her behaviour (as a function of cognitive development, for example).
- The student's continuing presence in the school does not create an unacceptable risk to the safety of any person.

In the case of a student for whom an Individual Education Plan (IEP) has been developed, other factors to consider are:

- whether the behaviour was a manifestation of a disability identified in the student's individual education plan;
- whether appropriate individual accommodation has been provided;
- whether the suspension or expulsion is likely to result in an aggravation or worsening of the student's behaviour or conduct.

For a student with special needs who is demonstrating unsafe behaviours, the IEP should identify alternative curriculum expectations in one or more of the areas of social skills, self regulation and social communication, along with appropriate teaching strategies and evaluation methods. The IEP will include:

- Articulated needs in the areas of self regulation, social-emotional skills, and/or social communication that are linked to assessment;
- Accommodations and/or modifications appropriate to the needs identified that support proactive strategies;
- The student's current level of achievement, including recurring behaviours that interfere with school achievement or success as sourced from assessment data (e.g. report cards, professional reports, etc.) and/or behaviour data tracking;
- Alternative learning expectations to address the areas of need identified;

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- Positive behaviour support strategies geared to meeting the alternative goals and expectations;
  - Assessment tools, appropriate for measuring improvement, e.g., behaviour data tracking tools.

## **RESPONSIBILITIES:**

### **The Board of Trustees is responsible for:**

- Reviewing this administrative procedure to ensure its alignment with the Safe and Accepting Schools Directional Policy;
- Reviewing this administrative procedure as part of the regular policy and procedures review cycle.

### **The Director of Education is responsible for:**

- Ensuring that the Safe and Accepting Schools Directional Policy and all Administrative Procedures falling under it are in line with, and expressive of, the PVNC Multi-year Strategic Plan: Vision, Mission and Strategic Priorities;
- Overseeing implementation of this Administrative Procedure.

### **The Superintendent of Learning - Safe Schools is responsible for:**

- Reviewing and revising this administrative procedure as necessary.

### **The Superintendent of Learning - Special Education is responsible for:**

- Overseeing delivery of Special Education Services;
- Overseeing safety training, program adjustments and staff/resource needs that may be required to balance the safety and learning needs of students with special education needs.

### **The Superintendent of Learning - Human Resource Services is responsible for:**

- Acting as a resource for, and ensuring compliance with, the *Occupational Health and Safety Act* and to communicate with the Ministry of Labour, and/or the Joint Occupational Health and Safety Committee where appropriate;
- Assisting with procedures for employee support, deployment, and communication to union affiliates and response to concerns.

### **Family of Schools Superintendents are responsible for:**

- Supporting principals in the implementation of this administrative procedure.

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### **Principals are responsible for:**

- Ensuring the safety of staff and students at the school through the facilitation of supportive and planned responses to address academic, social/emotional, and developmental behavioural and safety needs;
- Reviewing with all staff annually all emergency procedures, including those for summoning immediate assistance when required;
- Reviewing with all staff early in the school year their obligations to report unsafe behaviour, and the forms which facilitate this reporting;
- Conducting an investigation into all potential and reported incidents of unsafe behaviours and establish a school plan to alleviate the safety concern;
- Using progressive discipline and mandated alternate settings appropriately, including consideration of all mitigating factors;
- Reporting incidents of workplace violence requiring medical attention to their Family of Schools Superintendent, as well as to the PVNC Health and Safety Officer, within 4 days;
- Ensuring that all those who work regularly with students demonstrating unsafe behaviours are notified of any risk-of-injury, the nature of the behaviour that could present a risk-of-injury, the intervention strategies in place to prevent injury, the expected staff response should the behaviour occur and the specific incident reporting procedures;
- Establishing and communicating clear processes for the development, review and communication of Safety Support Plans, including Physical Intervention Plans;
- Initiating the review of Safety Support Plans;
- Ensuring that parents are informed of positive behaviour supports in place for their children, and that they are consulted in the development of Safety Support Plans, including Physical Intervention Plans;
- Ensuring that preventive programming and instructional interventions are implemented to respond to unsafe student behaviours.
- Ensuring that staff, permanent and occasional, are provided with the required information and instruction related to a Safety Support Plan, including a Physical Intervention Plan, to work with students who are likely to demonstrate unsafe behaviour;
- Ensuring that personal protective equipment (PPE), if required, is provided, monitored and used in accordance with this administrative procedure;
- Promoting staff awareness and acceptance of Behaviour Management Systems (BMS) principles;
- Promoting staff awareness and understanding of practices that promote positive mental health and well-being;
- Encouraging all staff to approach student behaviour in the same cyclical method as improvement in academic skills – gather information, set goals, implement, review progress, modify plans accordingly;

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- Being familiar with relevant documentation, legislation and issues of confidentiality, and sharing this information with staff, parents, and community members, as appropriate;
  - Facilitating a school and classroom safety audit specific to supporting student needs including available self-regulation supports;
  - If a student transfers out of their school into another PVNC school, communicating appropriately with the receiving PVNC principal any relevant information around safety concerns;
  - Ensuring that tracking of behaviour has been initiated, where appropriate;
  - Ensuring that an IEP, including alternative program page(s) in one or more areas of social-emotional skills, self-regulation and social communication, has been developed and implemented for special needs students exhibiting unsafe behaviours;
  - Ensuring that post-incident debriefs occur, when required, as per this administrative procedure.

**School Staff are responsible for:**

- Implementing early, ongoing, preventive, supportive and planned interventions to address students' academic, social/emotional, and developmental behavioural and safety needs, as per the PVNC tiered Intervention Checklist;
- Deliberate planning of the classroom and school environment to support students' social-emotional and self-regulation needs, as appropriate;
- Bringing safety concerns to the attention of the principal;
- Following procedures laid out in the student's Safety Support Plan, including the Physical Intervention Plan;
- Co-creating the Safety Support Plan if the staff member works directly with the student on a regular basis;
- Providing copies of student's Safety Support Plan, including the Physical Intervention Plan, for occasional staff when absent;
- Contributing to a post-incident debrief, when necessary;
- Wearing PPE as required;
- Maintaining the confidentiality of student information.

**Parents are responsible for:**

- Providing school staff with all relevant information in order to program appropriately for the student;
- Being knowledgeable about, and/or contributing to, a student's Safety Support Plan, including the Physical Intervention Plan, if applicable;
- Being knowledgeable about, and/or contributing to, a student's IEP;
- Supporting the school staff in implementing the Safety Support Plan and/or IEP.

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**Students are responsible for:**

- Contributing to a caring and safe school environment at all times to the best of their abilities;
- Learning to advocate for their needs in an appropriate manner;
- Contributing to decisions about their individual programs, where applicable.

**PROGRESS INDICATORS:**

- Students are served in classrooms that have caring and safe climates with preventive, supportive and planned responses to address academic, social/emotional, and developmental behavioural and safety needs;
- Incidents of unsafe behaviour decrease;
- Staff feel a sense of self-efficacy in addressing unsafe behaviours;
- School climate surveys indicate that staff and students feel safe, included and supported in their learning and work environments respectively.

**DEFINITIONS:****Behaviour Data Tracking**

This is ongoing daily tracking of behaviours, including self-regulation needs. It is an important component in identifying patterns in the student's behaviour, modifying or adjusting intervention strategies, and evaluating the success of the Safety Support Plan and possibly the IEP. Since it details ongoing behaviour and self-regulation needs, it is also an important tool when communicating with parents/guardians/ caregivers, community agency support services, school administration, and special education services involved in the management of unsafe behaviours.

**Intervention Checklist**

The PVNCCDSB Intervention Checklist is a tiered intervention approach for supporting students. Tier 1 outlines classroom-level supports which are good for all students. Tier 2 outlines school-level supports which address the needs of students who require more targeted supports. Tier 3 outlines Board- and agency-level supports which are required for a few students who require more intensive interventions. The Intervention Checklist is to be consulted as school staff determine support required for student needs on a progressive continuum.

**Physical Intervention**

Physical intervention refers to a preventive procedure employed in exceptional circumstances where there is an imminent risk that a student may physically injure

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herself/himself or others. Intervention may involve the use of physical containment which limits a student from performing the injurious action.

- **Physical Containment**

- Small Student Containment - to be used when a student's height is at a staff member's chest level or lower. Two staff members are required for small student containment: one to perform the containment, and one to monitor the student.
- Large Student Containment - to be used when a student is taller than chest level. Three staff members are required for large student containment: two to perform the containment, and one to monitor the student.

### **Safety Support Plan**

This is a predetermined plan of action developed by staff, in consultation with parents/guardians/caregivers (and may involve student feedback/voice/input). A Safety Support Plan will be written for students whose behaviour is a safety risk for themselves and/or others. A current copy of the Safety Support Plan is kept in the OSR.

### **Unsafe Behaviours**

The behaviour of a student is unsafe when:

- It presents a risk-of-injury to self and/or others;
- The behaviour is current and occurs on an ongoing basis (as documented in a behaviour data tracking tool, or anecdotal records);
- The behaviour is of such intensity that injury to self and/or others has occurred or is likely to occur;
- The behaviour is of such intensity that intervention is required to prevent or minimize injury to self and/or others and includes flight risks.

### **Violent Threat Risk Assessment (VTRA)**

The overriding goal of this assessment is risk reduction and violence prevention to promote the safety of students, parents/guardians, school staff, community members, the school or other buildings or property. A VTRA is facilitated by intentional communication of relevant student information between school and community partners, as per an agreed-upon protocol. Information is shared on a confidential basis and is to be used solely for the purposes of the assessment or for actions directly related to or flowing from the assessment. The VTRA follows a three-step process:

- 1) data collection and immediate risk reducing interventions;
- 2) multidisciplinary risk evaluation;
- 3) comprehensive multidisciplinary intervention.

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## **Workplace Violence**

Under the Ontario Occupational Health and Safety Act, workplace violence is defined as the exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker; an attempt to exercise physical force against a worker, in a workplace, that could cause physical injury to the worker; and/or a statement or behaviour that it is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker.

## **REFERENCES:**

Education Act

PPM 145 (2012) Progressive Discipline and Promoting Positive Student Behaviour  
Occupational Health and Safety Act, and Bill 168 - Violence and Harassment in the Workplace

Ontario Human Rights Code

Caring and Safe Schools In Ontario – Supporting Students with Special Education Needs Through Progressive Discipline, Kindergarten to Grade 12

Effective Educational Practices for Students with Autism Spectrum Disorders, 2007

Joint Police-School Board Protocol

Municipal Freedom of Information and Privacy Protection Act (MFIPPA)

The Child and Family Services Act (CFSA)

The Personal Health and Information Protection Act (PHIPA)