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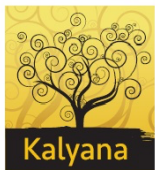
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This document is an accompaniment to the Policy Manual.

Procedures are filed alphabetically



PURPOSE The purpose of this policy is to ensure that personal information of students and staff is not disclosed to inappropriate parties. Refer, also, to the School Program and Course Calendar and Safe Schools Policy found in the Policy Manual.

DEFINITIONS The following are important definitions:

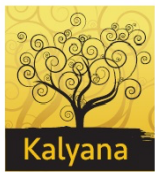
- Confidentiality - Non-disclosure of personal information
- Personal Information - Any identifying information about clients, including but not limited to, name, age, birth date, address, family details, health information, characteristics, educational progress
- Proprietary Information - business, financial, technical and other types of information and/or ideas, in written, electronic and oral form, which are related to our school and/or our business.

PERMISSIONS Personal information may be disclosed to parents or guardians and anyone for whom a parent or guardian has provided written permission to The Gregory School for Exceptional Learning and Kalyana Support Systems.

PERSONNEL BOUND BY PROCEDURE Staff, consultants, associates and volunteers are all bound to uphold this policy in its entirety.

DETAILS & PROCEDURES The following are the details of procedures to which our organization adheres:

- Personnel will refer to clients using client code, initials or alias when communicating about them in public and/or through text message/email/phone.
- Personnel will refrain from answering questions from student's family members regarding the programming or progress of other students.
- Personnel will hold in confidence and not possess or use (except to perform requested tasks) or disclose any Personal or Proprietary Information except information that (a) is in the public domain, (b) was properly known, without restriction, prior to any disclosure, or (c) as may be required by law. The foregoing does not grant to Personnel a license in or to any of the Proprietary Information.
- Personnel will report any accidental and/or improper release of Personal or Proprietary Information to GSEL/KSS's Executive Director or Principal.
- Personnel whose contract expires or is terminated, will promptly return all Proprietary Information and all copies, extracts and other objects or items in which it may be contained or embodied.
- Personnel not bound in contract to GSEL/KSS (e.g., volunteers) will sign a confidentiality agreement prior to having access to Personal or Proprietary Information.
- Personnel are bound by these procedures, following the expiration or termination of an employment of service contract, indefinitely.
- Failure to comply with these procedures will result first in a verbal warning, followed by progressive discipline measures.
- These procedures will be distributed to both staff and clients through the Staff and Parent Handbooks.



These procedures are an appendix of the Safe Schools Policy (Bullying)

PROCEDURES FOR RECONCILING A BULLYING EVENT When a bullying event is reported by a student (either victim or by-stander), it will be considered as a truthful report in the absence of undeniable information to suggest otherwise. Such reports will not be seen as insignificant or ignored as “tattling”.

When a bullying event is reported to or seen by a staff member:

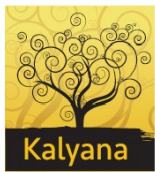
- A staff member will immediately remove Bully from the situation.
- The staff member will next discuss the following questions with Bully:
 - Do you know why I pulled you away from the others?
 - How do you think what happened made (victim’s name) feel?
 - How did it make you feel?
 - Why do you think it happened?
- The staff member will review the event with the Bully and explain that it was bullying.
- The Bully will apologize to the victim verbally.
- Immediately following the Bully’s verbal apology, the Staff member will:
 - Reassure the victim that no one condones the bullying and that adults are here to try to keep everyone feeling safe.
 - Discuss what happened, why it is Bullying, and why it is not something to be tolerated.
 - Discuss how victim responded.
 - Discuss how victim might respond if a similar situation were to occur in the future.
- The Bully will follow up with a written apology note (The note should say something to the effect of “I’m sorry for teasing you. I know this must have hurt your feelings. I will try hard not to do it again.”).
- The incident will be reported to the Bully’s parent(s) and the Victim’s parent(s).
- Staff will follow up with additional counselling to the Victim if necessary.
- Staff will complete a “Bullying Incident Report” and deliver it to the principal

PROCEDURES FOR PREVENTING BULLYING EVENTS We strive to prevent bullying. Staff members will:

- Give the Bully ways to help out around the school.
- Assign the Bully specific jobs to accomplish during “high-risk” times (e.g. transitions to recess).
- Highlight and praise “great” moments when the Bully has helped another person or interacted appropriately with a victim. Make an effort to catch the Bully being good (Use school’s “Great Tickets” system).

OTHER INFORMATION “Tattling” refers to telling adults information that is not essential to the safety of students or property. “Telling”, on the other hand, lets adults know what happened in a bullying situation and enables them to address the problem. Students sometimes have trouble making this distinction, so they need reminders that it is always okay to talk to parents, teachers and other familiar adults. Students need to know that it’s okay to walk away from a fight and find an adult to help. When a child is being

verbally bullied, he should be encouraged to take a few seconds to think before responding. Just taking a breath instead of speaking back in anger can help defuse a violent situation, and it's important for children to recognize that this is a commendable choice – not a weak one. Bystanders need to be active witnesses, standing up for their peers, speaking out against injustices, and taking responsibility for what happened among them.



PURPOSE This information is provided as an appendix to the Safe School Policy (Child Abuse). Behavioural or physical indicators may be helpful sometimes in offering clues that a child may have been abused. The following information has been extracted from the Handbook for School Personnel, Metropolitan Toronto Special Committee on Child Abuse, preventative education program.

INDICATORS OF PHYSICAL ABUSE Some physical indicators may be:

- Marks, welts, bruises, scratches, punctures, cuts or fractured bones which are unexplained or inconsistent with the explanation offered
- Marks or bruises on those parts of the body not generally injured in the normal course of play
- Loss of hair or a bald spot where the child has been grabbed by the hair
- Presence of several injuries, bruises or broken bones that are in various stages of healing
- Injuries that appear to be caused by an instrument used with force (e.g. hand marks, buckle marks, adult size bite marks)
- Burn marks (e.g. from cigarettes, iron, stove element, hair curlers) or inflamed tissue on parts of the body such as hands, feet, buttocks which may suggest scalding and which are inconsistent with the explanation offered

Some behavioural indicators may be that the child:

- Cannot recall how injuries occurred or offers an inconsistent explanation
- May cringe or flinch when touched unexpectedly
- May display a vacant stare or frozen watchfulness
- May be extremely aggressive or withdrawn
- May display indiscriminate affection-seeking behaviour
- May be extremely compliant and/or eager to please

INDICATORS OF EMOTIONAL ABUSE There are few physical indicators of emotional abuse, so educators should watch for behavioural signs which may indicate that the child or adolescent is being, or may have been victimized. These signs can include:

- An extreme lack of confidence
- Severe depression
- A non-medical failure to thrive
- Extreme passivity or aggressiveness
- Inappropriate adult behaviour or, conversely, infantile behaviour

INDICATORS OF NEGLECT There are both physical and behavioural indicators. Some indicators of neglect may be:

- Lag in physical development, significant weight loss, and/or dehydration
- Persistent hunger, appears undernourished
- Poor hygiene, dirtiness, lice, skin disorders which are non-medical in origin
- Persistent fatigue and listlessness
- Unattended sores, cuts and other medical problems
- Inadequate, poorly maintained, inappropriate clothing

- Short attention span in school and at play
- Begging or stealing food
- Reporting no one to care for him/her at school

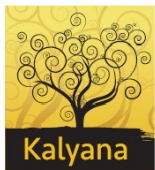
INDICATORS OF SEXUAL ABUSE Sexualized behaviour in children should be understood to be the result of sexual assault, not the cause of it. Many victims have been socialized or conditioned to behave in a sexualized manner by their abuser's rewarding and reinforcing it. Some examples of sexually inappropriate behaviour are:

- Unusual sexual knowledge
- Persistent and inappropriate sexual play for the child's age and developmental level (including sexual play with toys)
- Sexualized expression of affection
- Excessive masturbation/self-stimulation
- Simulated sexual acts with siblings or friends or sexual attention to pets or animals
- Precocious or flirtatious behaviour
- Sexualized kissing in relationships with parents and friends
- Sexual preoccupations
- Compulsive sexual behaviour (e.g. grabbing breast or genitals or compulsively removing clothes).
- Confusion about sexual norms

There are also other behavioural indicators of sexual abuse. According to research, 90% of children never verbally tell anyone they were sexually abused. However, some children may "tell" us through behavioural expressions of trauma such as:

- Sudden change in feeling about a certain person or place
- Unusual fear of a particular person or people, of going home, of going to daycare, of being left alone, of real or imagined objects or persons, of monsters, masks or uniforms, which persist beyond the normal time period, immobilizing the child, causing extreme patterns of flight or fright
- Evidence of an unusually secretive "special relationship" with an older person, particularly one involving elements of bribery, trickery or coercion
- Nightmares, night terrors and sleep disturbances (nightmares are uncommon for children under age 3), chronic "tiredness" (e.g. falling asleep in class)
- Self-destructive behaviour such as drug/alcohol abuse, prostitution, indiscriminate sexual activity, self-mutilation, suicide threats/attempts, being "accident prone," or running away
- Dramatic behaviour changes (e.g. acting out or disruptive behaviour causing difficulties with other children and affecting adjustments and play)
- Overly compliant, or conversely, overly aggressive and destructive or anti-social behaviour
- Compulsive lying and/or confusion regarding personal reality (e.g. disassociation, multiple personalities)
- Global distrust of adults or specific distrust of adults of the same sex or resembling the perpetrator
- Regressive toilet training problems resulting in child being toilet trained again
- Possible learning disabilities that may not be evident and might show up at later developmental stages
- Regression to infantile behaviour (e.g. bed-wetting, thumb-sucking, dramatic and persistent crying unrelated to any other event), tantrums, or conversely, pseudo-mature behaviour
- Clinging or compulsive seeking of affection and attention of both boys and girls

- Chronic depression, anxiety, withdrawal, and phobic behaviour
- Poor peer relationships, self-image, and overall physical care



PURPOSE The purpose of this document is to outline potential conflicts of interest between staff and The Gregory School for Exceptional Learning and Kalyana Support Systems (GSEL/KSS).

DEFINITION A conflict of interest is any situation in which an employee's personal interests (including the interests which they may owe to another) and those of GSEL/KSS arise simultaneously and appear to conflict. The issue is not the integrity of the employee concerned, but the management of any potential to profit from a person's position as employee, or for an employee to be influenced by conflicting loyalties. Even the appearance of a conflict of interest can damage our organization's reputation, so conflicts need to be diligently managed.

Our employment contract expressly sets out (and therefore limits by inference) the benefits that employees can receive from our organization, in return for any service provided. Benefits include any property, goods or services of monetary value, as well as money itself.

Employees should never be in a position of conflict between their personal interests and duty to our school, unless that possibility of personal benefit from which the conflict of interest arises is transparent. Transparency is achieved by requiring explicit pre-authorization of that benefit, and by ensuring that any particular conflict of interest is properly and openly authorized. It is the potential, not just the actual, benefit from which the conflict of interest arises, which requires authorization, in order to avoid a breach of trust and to ensure transparency. This will discourage accusations of impropriety, which could in turn have a damaging effect on our company/school's reputation.

BENEFITS FROM CONFLICTS OF INTEREST Benefits from conflicts of interest can be:

- Direct financial gain or benefit to the employee (such as payment to the employee for services provided)
- Indirect financial gain (such as the engagement by the organization of a spouse, partner, relative or friend of an employee, where their finances are interdependent)
- Non-financial gain (such as when a user of the organization's services is also an employee)
- Conflict of loyalties (such as where a spouse, partner, relative or friend of an employee is engaged by the company/school)

AUTHORIZATION GSEL/KSS expects employees to be able to identify conflicts of interest when they arise and to ensure, if they receive a material benefit as a result of the conflict of interest, that the benefit is pre-authorized. GSEL/KSS will provide such authorization where there are clear advantages to our organization. When GSEL/KSS discovers, or is alerted to, an unauthorized benefit, then the action taken will depend on the extent of both the benefit and of the conflict of interest, and on the impact on our organization.

IN BEST INTEREST OF THE ORGANIZATION Employees should bear in mind that when they are dealing with the business of our organization, their overriding duty is to act in the best interests of the organization. Employees are a reflection of the company/school, even outside of work hours.

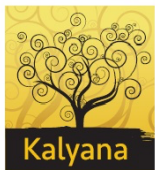
CONTINUOUS ENFORCEMENT This Conflicts of Interest Policy is to be upheld 12 months of the year, even if staff contracts are terminated over the summer months. The clients are still the organization's clients, therefore all of the concerns listed herein are still in effect.

NON-COMPETITION Employees are required to refrain from engaging in private work involving any of the organization's present or past students for a period of 2 years after which the employee ceases to be employed by the organization.

TERMINATION Where it seems that employees have deliberately placed their own interests ahead of those of the school, in order to gain significant benefit at the expense of our organization, then that employee will be terminated.

SPECIFIC CAUTIONS Situations employees should be cautious of engaging in include, but are not limited to:

- Tutoring privately (as doing so is not in the best interest of the school)
- Babysitting for clients (as doing so can create instances of favouritism and blurring of responsibilities)
- Driving students (as doing so can create instances of favouritism, blurring of responsibilities and risk of liability)
- Other instances of working privately for a client
- Accepting personal gifts from clients (as doing so can create instances of favouritism)
- "Friending" clients through social media (as doing so can create instances of favouritism and reflect upon the company/school)



PURPOSE The purpose of this document is to articulate the expectation that staff adopts our *Business Casual* Dress Code. Our objective in setting this dress code is to allow employees to work comfortably and sensibly with students while projecting a professional image to our client families, consultants and community visitors.

DEFINITION Business casual is a term used to describe a type of office dress or clothing style that is a little more casual than traditional business wear. Many employers adopt this dress code in an effort to allow employees to feel more comfortable on the job and to have more freedom of expression through their choice of attire. Although business casual is casual, it also doesn't mean that anything goes. ([wikihow.com/Dress-Business-Casual](http://www.wikihow.com/Dress-Business-Casual))

WHAT TO WEAR The following are appropriate and acceptable articles of clothing that you may wear to work:

- Casual dresses and skirts, and skirts that are split at or below the knee. Dress and skirt length should be at a length at which you can sit comfortably in public.
- Leggings are permitted if worn with dresses or skirts that meet the above requirement.
- Slacks that are similar to Dockers and other makers of cotton or synthetic material pants, wool pants, flannel pants, dressy capris, chino shorts, pants made from coloured denim.
- Casual shirts, dressy sleeveless shirts, dress shirts, sweaters, tops, golf-type shirts and turtlenecks. Most suit jackets or sport jackets are also acceptable, if they violate none of the listed guidelines.
- Conservative athletic or walking shoes, loafers, clogs, sneakers, boots, flats, sandals, dress heels and leather deck-type shoes. All shoes should be appropriate to the students you are working with. Wearing no stockings is acceptable in warm weather.
- Jewelry, makeup, perfume and cologne should be in good taste, with limited visible body piercing. Remember that some employees and clients may be allergic to the chemicals in perfumes and makeup, so wear these substances with restraint.
- Sports team, university and fashion brand names on clothing are generally acceptable.

WHAT TO AVOID The following are inappropriate articles of clothing that you should not wear to work:

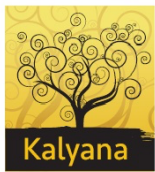
- Bluejeans, sweatshirts, sweatpants, exercise pants, short shorts, bib overalls, yoga pants or leggings worn without a dress.
- Shorts, skirts, and skirts that don't reach below the wearer's fingertips when standing.
- Tight skirts, sun dresses, beach dresses and spaghetti-strap dresses.
- Spaghetti strap tank tops, midriff tops, halter tops, racer back tank tops, sweatshirts and athletic t-shirts
- Clothing that reveals too much cleavage, your back, your stomach or your underwear.
- Torn, dirty, wrinkled or frayed clothing.
- Any clothing that has words, terms or pictures that may be offensive to others.
- Clothing that works well for the beach, yard work, dance clubs, exercise sessions and sports contests.
- Flashy athletic shoes, flip-flops, slippers, or shoes that are inappropriate for the student with whom

you are working

- Hats. However, head covers that are required for religious purposes or to honour cultural tradition are allowed.
- Strong scents including perfume, cologne, essentials oils, or smoke.

COMPLIANCE If clothing fails to meet these standards, as determined by the employee's supervisor, the employee will be asked not to wear the inappropriate item to work again. If the problem persists, the employee may receive a written notice, a copy of which will be placed in their employee file. Progressive disciplinary action will be applied if dress code violations continue.

Policy Update June 2021



PURPOSE The purpose of this policy document is to articulate the uses, risks and protocols concerning electronic communication both between clients and staff and among staff members. Our objective is to obtain informed consent with respect to the privacy that can be ensured with information that is shared via electronic communication platforms.

USES Electronic communication will be employed, but may not be limited to, the following uses:

- Administrative
 - Scheduling sessions or meeting times, cancelling sessions and/or reporting illness
 - Delivering invoices
 - Providing alerts/updates that pertain to the entire school/clinic community (e.g. emergency closures)
- Client care
 - Sharing ISP (Individual Service Plan) documents or related information
 - Providing sessions updates (client progress, suggestions for home, requests for materials)
- Internal (within staff)
 - Sharing program updates to staff
 - Imparting client updates to team of instructors
 - Alerting senior staff to client and/or program needs
 - Reporting illness to administrative staff

PLATFORMS Electronic communication will be made using the following platforms:

- Email
 - Between administration and families (for administrative and client care purposes, outlined above)
 - Between administration and staff (for internal purposes, outlined above)
 - For the protection of our employees, email is not to be used for clients and non-administrative staff to communicate
- Slack (Team communication board)
 - Between administration and families (for administrative and client care purposes, outlined above)
 - Between administration and staff (for internal purposes, outlined above)
 - Between families and the team of instructors assigned to their child(ren) (for client care purposes, outlined above)
 - Between members of an instructional team (for internal purposes, outlined above)
 - Between individual members of staff, when the topic does not relate to an entire team
 - For the protection of our employees, private channels on Slack are not to be used for clients and non-administrative staff to communicate

RISKS The Gregory School for Exceptional Learning and Kalyana Support Systems cannot guarantee the security of information sent electronically. The following is a limited list of some concerns regarding electronic communication (from The Medical Station):

- Despite reasonable efforts to protect the privacy and security of electronic communication, it is not possible to completely secure the information.
- Employers and online services may have a legal right to inspect and keep electronic communications that pass through their system.
- Electronic communications can introduce malware into a computer system and potentially damage or disrupt the computer, networks and security settings.
- Electronic communications can be forwarded, intercepted, circulated, stored or even changed without the knowledge or permission of the physician or the patient.
- Electronic communications may be disclosed in accordance with a duty to report or a court order.
- Electronic communications can be accidentally misdirected, resulting in increased risk of being received by unintended and unknown recipients.
- Electronic communications can be easier to falsify than handwritten or signed hard copies.
- It is not feasible to verify the true identity of the sender, or to ensure that only the recipient can read the message once it has been sent.

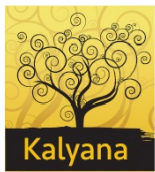
Reference: From The Medical Station (www.themedicalstation.com/site/email-communication-policy).

PROTECTIONS While The Gregory School for Exceptional Learning and Kalyana Support Systems cannot provide protection from all risks, we take the following precautions, in effort to reduce the risk of loss of privacy:

- A code is assigned to each client and this code, or its short form, will replace the client's full name in all internal and external electronic communication. All efforts will be made to refrain from the use of personal names in documents that will be transmitted electronically.
- Documents that require the use of client's name and/or identifying features will be password protected.

GUIDELINES While The Gregory School for Exceptional Learning and Kalyana Support Systems cannot guarantee a turn-around time, all efforts will be made to respond to non-urgent concerns within 24 hours. Please follow the following guidelines:

- Families can use their SLACK family channel to communicate illness notifications, session cancellations or other timely matters.
- Staff can communicate illness or other urgent matters via direct message to Angeline and Marg.



INTRODUCTION This policy is intended to govern interactions between parents, instructors and The Gregory School for Exceptional Learning and Kalyana Support Systems (GSEL/KSS) personnel to ensure that GSEL/KSS services are delivered in accordance with the ethical guidelines for educators and practitioners.

DEFINITIONS

- A practitioner is any instructor, therapist, psychologist, behaviour analyst, consultant, etc. working for or on behalf of GSEL/KSS
- A client is the person for whom the practitioner is providing service. The “client” includes family members (e.g., parents) of the actual client (e.g., student).
- A gift is any item or service from a client (or client’s family) of more than token value

CONTEXT It is natural that clients develop a relationship with their service providers that may exist over many years. It is of upmost importance to a client’s wellbeing that only a professional relationship exists between the client and the client’s family and member of the client’s educational and therapeutic team. The Behaviour Analyst Certification Board explicitly states that practitioners must avoid establishing dual relationships with clients (BACB, 2016). Situations that may negatively impact the client’s wellbeing are to be avoided by planning for ethical conduct throughout every interaction. There are two main situations that are given consideration in this policy: signs of appreciation and signs of friendship.

SIGNS OF APPRECIATION Clients often express their appreciation through the giving of tangible gifts. The BACB states that behaviour analysts are to refrain from accepting or giving gifts as this constitutes a dual relationship (BACB, 2016).

The College of Psychologists of Ontario (2015) states:

“Giving or receiving gifts of more than token value is contrary to professional standards because of the risk of changing the therapeutic relationship. For example, a client who receives a gift from a member could feel pressured to reciprocate to avoid receiving inferior care. Conversely, a member who accepts a significant gift from a client risks altering the therapeutic relationship and could feel pressured to reciprocate by offering “special” care.”

However the American Psychological Association (2015) also states that practitioners should also consider cultural factors when deciding whether to accept gifts from clients. In order to respect the dignity of others they may accept a gift, knowing that they do more harm than good if they refuse a reasonable gift. Thus personnel must exercise judgment in implementing the guidelines presented within this policy document.

SIGNS OF FRIENDSHIP Clients and practitioners are often tempted to develop personal relationships. This can happen in a number of ways:

- Self Disclosure: Practitioners must be careful to limit the amount of personal information they share with clients. The College of Psychologists of Ontario (2015) states:

"A number of dangers may exist in self disclosure including shifting the focus from the needs of the client to the needs of the therapist or moving the professional relationship toward one of friendship. The blurring of boundaries can confuse the client with respect to roles and expectations. The primary question to be asked is, "Does the self disclosure serve the client's therapeutic goal?"

- Socializing: Practitioners must be careful not to socialize with clients. The College of Psychologists of Ontario (2015) states:

"In the course of therapy, some clinicians, on occasion, may engage in activities that resemble friendship, such as going on an outing with a child or adolescent, or attending a client's play, wedding, or special event. In all cases it is the clinician's responsibility to ensure that the relationship remains therapeutic and does not develop into a friendship or a romantic involvement."

EXAMPLES Gifts that a practitioner should not accept from a client and activities that a practitioner should not engage in with a client include, but are not limited to:

- Tangible items
- Services the client offers to perform
- Invitations from the client to join in family meals
- Interacting with clients in a social setting

EXCEPTIONS Gifts that a practitioner may accept from a client and activities that a practitioner may engage in with a client include, but are not limited to:

- Cards and homemade items
- A drink of water, coffee or tea when the practitioner is working in the client's home
- Invitations to social events that are related to a celebration for the client's success (e.g., graduation party).
- A gift that in its refusal would cause more harm (see above). In this case, the receiver would discretely donate the gift to an unrelated person or charity, in order to avoid direct benefit from the gift.

TRAINING This policy will be part of the regular and ongoing annual staff and volunteer training.

IMPLEMENTATION This policy will be fully implemented no later than August 31st, 2015.

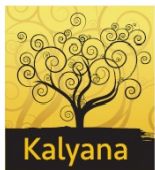
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The College of Psychologists of Ontario (1998). Professional Boundaries in Health-Care Relationships. *The*

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HIRING

The following occur prior to offering an employment contract:

- Phone Interview by the Director of Recruitment and Training
- In-person (or in exceptional cases, Zoom) Interview with the Director of Recruitment and Training and one or more Clinical Directors
- Reference checked by the Officer Manager and reviewed by one of the Directors

The following occur within 30 days of employment:

- Vulnerable Sector Screening (clear) (repeated every two years)
- Safety Care physical intervention training (pass) (repeated annually)

*Note: employees are not ever left alone with students prior to the above requirements being met.

REMUNERATION Rate of pay is determined by a wage grid that considers education, training and field experience, and years of service at GSEL/KSS. Annual contracts are offered prior to the end of each calendar year, and remain in effect for one calendar year minus 1 week.

TRAINING

Training is provided in the following topics prior to working independently with students:

- Policies and Procedures: Bullying, Child Abuse, Code of Conduct, Confidentiality, Ethical Relationships, Incident/Injury Reporting, Health and Safety, Physical Intervention, Physical Prompting, Privacy (all reviewed annually)
- Teaching Methodology: ABA, Behaviour Management, Data Collection, Direct Instruction, Discrete Trial Teaching, Manding, Pairing, Program Details, Severe Problem Behaviour

SUPERVISION

The following occur throughout employment:

- Direct supervision of 2-5% of student contact hours
- Senior staff are present in student rooms at random intervals
- Most classrooms contain several student stations and several instructors
- Cameras are installed in room where a student and teacher may be alone for significant periods of time and across most common spaces so that supervision can occur
- Treatment Integrity Checklists are implemented across most teams; monthly observations, at a minimum, until 80% accuracy is met

CLIENT CARE ROLES

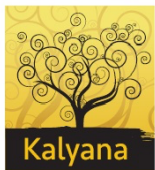
- Clinical Supervisor is a member of the College of Psychologists and Behaviour Analysts of Ontario, and is responsible for the oversight of client programs, and work together with the Case Manager or Team Supervisor to monitor and ensure client progress.
- Case Manager is responsible for overall client programming, team management and team supervision.
- Course Leader establishes objectives, plan, teach and report on a specified course or subject area.

- Team Supervisor and Team Leader monitors program data, manages program materials, liaise with instructors, case manager and/or clinical supervisor. Team Supervisor has additional program writing and data management responsibilities.
- Instructor implements programming as directed by team leader, case manager and/or clinical supervisor.
- Associate is an individual in supervised practice, either holding or completing a post-graduate degree in the field of Applied Behaviour Analysis. An associate may serve the roles of case manager, course leader, team supervisor, team leader and/or instructor.

ADMINISTRATIVE ROLES

- Clinical Directors oversee every aspect of the school and clinical operations.
- Director of Recruitment and Training manages recruitment, hiring, onboarding, and ongoing training.
- Director of Client Care manages student intake, scheduling and supervises the overarching care of our families.
- Office Manager completes a number of tasks related to facilities and operations at the direction of a clinical director.
- Office Clerk completes a selected number of tasks at the direction of a Clinical Director and/or the Office Manager.

PERFORMANCE REVIEWS Performance reviews will be conducted regularly or on an “as-needed” basis.



PURPOSE This document sets out the policy of The Gregory School for Exceptional Learning and Kalyana Support Systems (GSEL/KSS), regarding employee adherence to workplace schedule to ensure adequate staffing and to meet expected productivity standards.

ELIGIBILITY This policy applies to all GSEL/KSS employees.

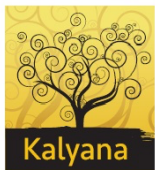
PROCEDURES GSEL/KSS employees are to arrive in advance of their scheduled shift. All employees should be prepared for the work day and in their client's designated location 15 minutes prior to their client's arrival.

Employees are expected to adhere to workplace schedules. Any employee unable to adhere to their assigned schedule must obtain approval in advance of any requested schedule changes. This approval includes requests to use paid leave time as well as late arrivals to or early departures from work.

Failure to obtain prior approval will be considered an occurrence.

OCCURRENCES Employees will receive an occurrence for unapproved absences, late arrivals or early departures.

- Absences without notice are equal to one occurrence
- Late arrival or early departures without notice are equal to one half occurrence
- Late arrival or early departure with notice are equal to one quarter occurrence
- Employees that receive two (2) occurrences will be subject to progressive discipline



PURPOSE This document sets out the policy of The Gregory School for Exceptional Learning and Kalyana Support Systems (GSEL/KSS), regarding the standards, guidelines, and procedures for employees who experience a loss of or damage to personal items during the performance of their job duties.

ELIGIBILITY Employees who experience a loss of/damage to personal items in the course of performing work duties may be compensated by GSEL/KSS provided that the loss was:

- not due to the employee's negligence
- the items are those that employee was reasonably required to have in their possession during the performance of their duties.

RESPONSIBILITIES

It is the responsibility of GSEL/KSS to:

- provide reasonable measures to prevent damage or loss during normal completion of duties;
- to investigate all matters relating to the personal loss of employee items;
- to provide compensation for personal loss in an expedient manner.

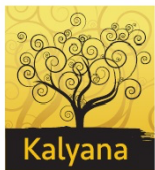
It is the responsibility of employees to:

- exercise due care in the course of employment;
- wear or carry only items that are reasonable to be in their possession in the course of their duties;
- take reasonable precautions to secure personal items against damage;
- wear protective equipment as required;
- report personal loss to the Directors in an expedient fashion.

PROCEDURES All incidents of damage or loss must be reported, in writing, by employees to the Directors, by the end of the employee's shift. The written claim should give full details of the circumstances under which the personal loss occurred and the estimated cost for replacement or repair. Where possible, damaged items should be available for inspection.

Compensation will only apply to those personal items which employees would reasonably have in their possession during the normal performance of the assigned duties and when the loss or damage was not caused by the employee's negligence.

REIMBURSEMENT GSEL/KSS will provide reimbursement for reasonable repair or replacement of damages incurred to the employee's eyeglasses, contact lenses, prothesis, or ripped clothing occurring as a result of student interaction or assault while performing work. GSEL/KSS will reimburse up to a maximum of \$300 for eyeglasses and a maximum of \$100 per incident for other personal items, to a maximum of \$400 annually.



PURPOSE This document describes procedures taken by The Gregory School for Exceptional Learning and Kalyana Support Systems (GSEL/KSS), regarding authorized, short-term absences and medical/sick leave entitlements for employees.

REGULATIONS

Employment Standards Act, 2000 (ESA)

Employees in Ontario are entitled to up to three days of unpaid job-protected leave each calendar year due to personal illness, injury or medical emergency, once they have worked for an employer for at least two consecutive weeks.

ELIGIBILITY This policy applies to all employees who have been continuously employed with Kalyana Support Systems for at least two consecutive weeks.

Sick leave may be taken for any personal illness, injury, or medical emergency. Ontarians cannot use this leave to take care of ill or injured family members; however, there are other leaves employees can take for this reason.

Employees can also use sick leave for pre-planned (elective) surgery, if it is for an illness or injury. But sick leave cannot be availed for cosmetic surgery that is not medically necessary or is unrelated to an illness or injury.

In cases where an employee is contracted for less than 32 hours a week, the number of unpaid or paid days outlined in this policy is prorated for the percentage of full-time hours which they are contracted to work.

PROCEDURES When employees want to use their sick time, they must notify their supervisor as soon as possible through GSEL/KSS's scheduling platform. The employee should inform when they will be off and, if possible, for how long. If the duration is unknown, they should notify GSEL/KSS of any absence intention daily.

Time off is typically granted in half-day increments. It is important to note that employees reporting to work earlier than their scheduled time will not necessarily be permitted to resume their work day. Should employees be available to work at an earlier time, they must report to their supervisor prior to clocking in for the day.

SUBMISSION DEADLINES

- Requests for leave due to a sudden illness must be made as soon as possible; prior to 6:30 AM is preferred

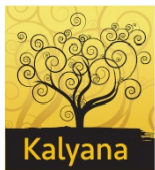
MEDICAL DOCUMENTATION Under certain circumstances, employees might need to submit a physician's note or other medical certification and/or complete a sick leave form. Those circumstances may include but are not limited to:

- Being absent for more than three consecutive days on sick leave
- Being absent for more than 5 separate instances in a two month period
- Cases when a pattern arises (e.g. employees plead sick at a specific time each week.)

All sick time requests will be handled with discretion.

OTHER LEAVE ENTITLEMENTS Please refer to the Employment Standards Act for other job-protect leaves.

<https://www.ontario.ca/document/employment-standard-act-policy-and-interpretation-manual/part-xiv-leaves-absence>



PURPOSE This document sets out the policy of The Gregory School for Exceptional Learning and Kalyana Support Systems (GSEL/KSS), regarding the reimbursement of mileage for travel expenses incurred during the performance of their job duties.

ELIGIBILITY This policy applies to all employees who have been continuously employed with Kalyana Support Systems for at least two consecutive weeks and are using their personal vehicle to travel for business related purposes. This excludes the normal commute between home and work.

PROCEDURES Employees traveling to work locations other than the GSEL/KSS location may be eligible for paid travel time and/or mileage reimbursement. Employees claiming paid time for travel or mileage reimbursement must obtain prior approval from the Directors.

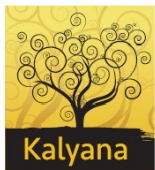
Employees may be eligible for paid travel time and/or mileage reimbursement in the following circumstances:

- when the commute to their designated, off-site work location exceeds 30 minutes. In this case, employees will be paid for the time in excess of 30 minutes. For example, an employee commuting 40 minutes to an off-site work location is eligible for 10 minutes of paid time.
- when the employee travels to multiple work locations over the course of their work day
- when making trips to purchase essential supplies for the business
- when completing errands at the request of the Directors
- when traveling to off site meetings involving current and prospective clients.

Mileage reimbursement will cover only those miles incurred over and above the employee's normal commute to his/her work location. For example, if the normal commuting round trip is 20 kilometres, and the employee commutes to a work location that covers 75 kilometres, only the incremental 55 kilometres are reimbursable.

Requests for mileage reimbursement must be made via the GSEL/KSS scheduling and time-clock platform, by the end of the employee's shift.

REIMBURSEMENT GSEL/KSS will provide reimbursement for mileage as per the CRA's automobile allowance rates. Reimbursement will be made via direct deposit to the employee's bank account in accordance with the GSEL/KSS payroll schedule.



PURPOSE This document sets out the policy of The Gregory School for Exceptional Learning and Kalyana Support Systems (GSEL/KSS), regarding the standards, guidelines, and procedures for vacation time for all employees.

REGULATIONS

Employment Standards Act, 2000 (ESA)

Employees in Ontario who are covered by the ESA are entitled to two weeks of vacation time after each 12-month vacation entitlement year. After five years of employment, that entitlement increases to three weeks. Pursuant to the ESA, employees start earning vacation time after they have completed one year of service.

Under the ESA, employees are entitled to the following vacation pay:

- four per cent of the gross wages earned, for employees with less than five years of service or
- six per cent of the gross wages earned, for employees with five or more years of service.

The Employment Standards Act does not permit an employee to forego an annual vacation and only receive the pay.

ELIGIBILITY All employees are eligible to begin earning vacation pay on the first day of their employment. Employees are eligible to book time off after twelve (12) months of employment.

In cases where an employee is contracted for less than 32 hours a week, the number of days outlined in this policy is prorated for the percentage of full-time hours which they are contracted to work.

PROCEDURES Every pay period, the employee will receive “vacation pay” equal to the vacationable earnings earned during the pay run. Employees will accrue vacation time as per employment standards over the course of the year.

Employees with less than one (1) year of service will be granted vacation at a rate of 0.83 days for each complete month of service. An employee’s vacation entitlement year is a recurring 12-month period beginning on the date of hire.

VACATION TIME REQUEST PROCESS Employees are required to submit a request for time off using the GSEL/KSS’s scheduling platform. Notification must include departure date and the return-to-work date.

Any conflict in vacation requests between employees will be decided based on employee seniority, organizational needs and the judgement of the Directors.

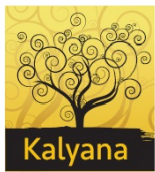
VACATION SCHEDULING Vacation scheduling is the responsibility of the Directors who will ensure that all employees are given their full vacation entitlement while taking into account the needs of GSEL/KSS. Employees should not make any vacation commitments until vacation scheduling has been approved.

If a mutually acceptable time for the employee's vacation cannot be found or an employee chooses not to schedule a vacation, GSEL/KSS. will exercise its right to decide on the time. However, in this particular situation, the employee will be provided at least two weeks notice of the start date of their vacation. The employee must take their vacation at that time.

Employees shall limit their use of vacation time to a maximum of two weeks within each 3 month period. Employees are guaranteed time off in accordance with the ESA. Requests for time off in excess of employment standards will be considered but are not guaranteed. These guidelines have been established to ensure that GSEL/KSS may continue to operate using optimal staffing levels.

SUBMISSION DEADLINES

- Requests for 1-2 weeks vacation must be submitted a minimum of four (4) weeks in advance
- Requests for less than one (1) week vacation must be submitted one (1) week in advance for every day requested. Example: 1 day = 1 weeks notice, 2 days = 2 weeks notice.
- Requests for time off that coincides with a professional development day must be submitted a minimum of four (4) weeks in advance.
- All vacation requests for the summer months (July-September) must be submitted no later than May 1.
- Employees are not permitted to schedule time off during GSEL/KSS's annual training week, regularly scheduled the week prior to the Labour Day weekend.



PURPOSE The purpose of this policy document is to let parents and staff know how The Gregory School for Exceptional Learning and Kalyana Support Systems (GSEL/KSS) determines inclement weather days and how they will be notified.

INCLEMENT WEATHER Inclement weather days do occur once in a while. GSEL/KSS follows the decision made by the Grand Erie District School Board for school closures. This information can be found at <http://www.stsbhn.ca> as well as their twitter account @STSBHN. In addition, GEDSB usually posts this information to their website, twitter and Facebook accounts. Administrative staff at GSEL/KSS will also notify families and staff via the #general channel on SLACK.

Children will be keep indoors under the following conditions:

- Heat Index of 32 degrees Celsius (temperature + humidity) or higher
- Heat Index of minus 28 degrees (temperature + wind chill) Celsius of lower

Time outdoors will be limited under the following conditions:

- Heat Index between 27 and 32 degrees Celsius (temperature + humidity)
- Heat Index between minus 20 and 28 degrees (temperature + wind chill) Celsius of lower

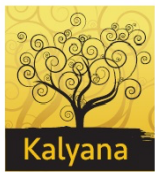
Other precautions that may be taken include:

- Ensuring children are well hydrated
- Limited outdoor time for children who are not dressed appropriately for the weather

CANCELLED SESSIONS If it is determined that GSEL/KSS is closed for the day, all sessions, whether in clinic or at home, will be cancelled. Session fees will not be billed.

STAFF COMPENSATION Staff will be compensated for their regular scheduled hours for inclement weather days. Please put your scheduled hours into Quickbooks. Check in with administrative staff if you have any questions.

Policy Revised August 2025



PURPOSE This policy sets out the requirements for the reporting and investigation of Injuries involving Members of the GSEL/KSS community and/or Incidents that involve physical intervention on GSEL/KSS Property.

Injuries must be reported and investigated in order to fulfill legal requirements, ascertain compliance with applicable safety regulations, and assist the GSEL/KSS in taking steps to remedy hazardous conditions to prevent recurrence. Incidents must be reported and investigated in order to ensure compliance with Safe Management Group techniques and compliance with ethical guidelines for staff/student interactions.

GSEL/KSS is subject to the provisions of the Occupational Health and Safety Act (Ontario, 2016).

DEFINITIONS

- An Injury is an abnormal condition or disorder that occurs as a result of an event on GSEL/KSS premises. Injuries include cases such as, but not limited to, a cut, fracture, sprain, or amputation. Illnesses include both acute and chronic illnesses, such as, but not limited to, a skin disease, respiratory disorder, or poisoning.
- An Incident is an event that requires physical intervention or was at risk of requiring physical intervention in order maintain safety for members of the GSEL/KSS community. An Incident does not include cases in which physical intervention is provided as a part of regular programming (examples include, but are not limited to, prompting procedures and personal care assistance).
- Personnel includes all employees, consultants, placement students, associates and volunteers.

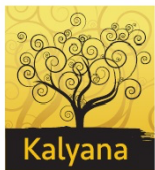
REPORTING REQUIREMENTS Personnel are required to submit a report for every event that involves injury and/or incident using the GSEL/KSS injury/incident report form. This includes events involving injury/incident to self, other adults or children. Copies of the form are available in the Courtyard (reception area). When multiple personnel witness an event, the one with most knowledge of the event should make the report. Other witnesses must be listed and should be consulted to ensure the report is complete.

The following information must be included on every report:

- Date, time, writer and reviewer of report
- Date, time, length and location of incident
- List of party(ies) involved in the injury/incident
- List of witnesses (adults and other children directly involved)
- Type of Incident (see checklist on form)
- Descriptive details - include all relevant ABC information, cause of injury and actions taken to treat injury and/or resolve incident
- Follow-up information - be specific about how and by whom parents will be notified; provide information about de-briefing, as applicable
- Signatures of reporting staff, parent (in case of client serious injury/incident) and supervisor

NOTIFICATION OF INJURY All efforts will be made to notify the parent immediately in the event of any injury to their child at school. Notification of minor incidents may be done via Slack or in person at pick-up. Major events (insignificant injury) should be reported immediately via a phone call.

TRAINING AND REVIEW This procedure will be reviewed with personnel annually, or upon revision.

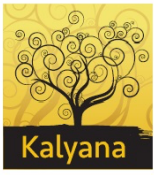


PURPOSE The Gregory School for Exceptional Learning and Kalyana Support Systems (GSEL/KSS) is entrusted with the care and education of its students. To protect the school community from the harmful effects of exposure to inappropriate information, it is essential that members of the school community understand and follow a code of behaviour with respect to the use of the Internet.

ACCESS TO THE INTERNET GSEL/KSS is equipped with wireless high-speed Internet service. Staff may have access to the Internet for the purpose of running instructional sessions and collecting data during instruction via computers and/or iPads. Staff may also have access to the Internet for the purpose of obtaining information for educational programming within the context of a school-related assignment or activity. Students may have access to the Internet ONLY under the direct supervision of a staff member, and ONLY for the purpose of obtaining information for educational programming within the context of a school-related assignment or activity.

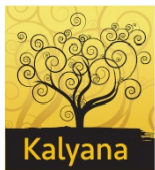
LIMITATIONS The following limitations apply to all members of the school community (e.g., staff, students, parents, consultants, volunteers, etc):

- Persons may have access to the Internet for person purposes ONLY with permission of the Principal.
- Persons may not access material that is obscene, child pornography or otherwise inappropriate.
- Persons may not access social networking sites including, but not limited to, Facebook.
- Staff members are NOT permitted to communicate with students or current parents (at any time or in any place) via social networking sites including, but not limited to, Facebook.
- Staff members are NOT permitted to communicate with students or parents (at any time or any place) about personal matters via email. Email MAY be used to communicate with students regarding homework or other school-related issues.
- Persons may not use technology resources to engage in unauthorized hacking or attempts to otherwise compromise any computer or network system's security.
- Persons may not engage in illegal activities on the Internet.



DELIVERY OF MEDICATION A consent form must be signed by a parent/guardian in order for staff members to be able to deliver any and all medications to any student. The medication name, dose, delivery time, delivery procedure and storage information must be included in the form. Record of Medication Delivery Forms will be stored in the Orchard in the left hand upper cupboards. Delivery of medication must be recorded on that form for any and all medications.

STORAGE OF MEDICATION All medication must be stored in a locked box, the key to which is stored in another location. The medication name, dose, delivery time, delivery procedure and storage information must be included on the bottle. Expired or unneeded medications must be returned to the family who supplied it.



GENERAL The Gregory School for Exceptional Learning and Kalyana Support Systems asks that parents:

- Understand and support the vision and values of GSEL/KSS.
- Support the school and its administration.
- Know and understand our policies and procedures.

CHILD'S WELLNESS Ensure that your child is healthy and well rested.

DAILY ITEMS The following is a list of items your child must bring to school every day:

- Snack for recess
- Lunch - including any required dishes and utensils. NOTE - If you would like instructors to heat up food items, please send microwave-safe dishes.
- Drinks
- Two pairs of shoes - one for outdoor and one for indoor use
- Appropriate outdoor clothing for recesses

REMAINING ITEMS The following is a list of items your child should leave at school for his/her use:

- Diapers and wipes, where applicable
- Edible reinforcers, where applicable
- Change of clothing

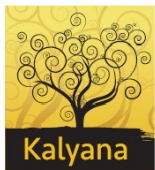
LABEL PERSONAL ITEMS Please ensure that your child's name is on outdoor clothing, footwear, lunch bags and personal items.

DROP-OFF AND PICK-UP Staff is not available to supervise students prior to their scheduled start time. At the end of the day, please be prompt to pick up your child. A late-pick up fee of \$25.00 per 15 minute period, or part thereof, will be charged.

REPORTING ABSENCES A client's absence should be reported to the school as soon as possible via SLACK or text message to the principal.

REPORTING OF RELEVANT INFORMATION Parents should relay to the instructor information that might be relevant to our care of your child. (e.g. It is helpful for us to know if your child had a bad night, or isn't eating well.)

CONFIDENTIALITY Please abide by the confidentiality that we expect of staff in the event that you accidentally hear information about another client while you are in the building. Parents who are in the building on a regular basis will be asked to sign a Confidentiality Agreement. We also ask that you avoid talking about sensitive issues concerning your own child in the presence of your child. We all forget from time to time that children may understand far more than they are capable of demonstrating.



PURPOSE The Gregory School for Exceptional Learning and Kalyana Support Systems (GSEL/KSS) endorses a supportive school environment that is safe and secure for all students and staff. GSEL/KSS attempts to create an environment where students can focus and learn to the best of their ability. GSEL/KSS recognizes that in some situations, a student may require assistance in completing a procedure involving physical contact between the teacher and student. Thus, GSEL/KSS shall provide prompting measures, when deemed necessary.

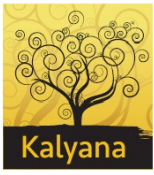
PHYSICAL PROMPTING Physical prompting may be used for the following reasons:

- To gain the student's attention
- To assist the student with self-care (dressing, toileting, etc.)
- To assist the student in performing fine or gross motor skills that are part of the curriculum
- To re-direct the student to an appropriate activity/location

Physical prompting may consist of:

- Touches to parts of the body, excluding private areas
- Touches to private areas only if necessary for toileting/dressing assistance
- Physically guiding the student to move to a different location
- "Hand-over-hand" to assist with an activity
- Pressure to hands, arms, legs, shoulders and back - if recommended by an Occupational Therapist (e.g. hand "hugs")
- Hugs, if requested by student/or consented to by the student *and* if within an appropriate context (e.g. birthday)

Please, also, refer to the [Safe School Policy \(Physical Intervention\)](#).



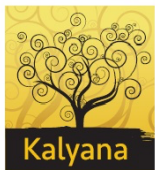
PREVALENT MEDICAL CONDITIONS E-LEARNING MODULE On August 11, 2025, Ophea launched a new e-Learning module on PPM 161: Supporting children and students with prevalent medical conditions (anaphylaxis, asthma, diabetes, and/or epilepsy) in schools. The Supporting Students with Prevalent Medical Conditions e-Learning module can be accessed at: <https://elearning.ophea.net/?lang=en>

or by emailing professionallearning@ophea.org.

The module was developed in partnership with Asthma Canada, Canadian Paediatric Society (Diabetes at School), Epilepsy Ontario, Food Allergy Canada, and the Lung Health Foundation

The module covers key responsibilities, relevant policies, and strategies for fostering a supportive and inclusive environment for students with medical conditions. It also offers practical guidance on the daily management of these conditions, as well as recognizing and responding to medical incidents and emergencies in the school setting.

Please refer to the Health School Policy (Prevalent Medical Conditions).



TUITION CONTRACT Parents will receive a Tuition Contract, which outlines the fees and payment structure. Both parents/legal guardians will be required to sign the tuition contract. Thirty days' notice of withdrawal may be given, upon which any prepaid amounts or post-dated cheques will be returned to the payer.

INCOME TAX DEDUCTIBILITY The information contained in this section is based upon Income Tax Interpretation Bulletin IT-519R2 (Consolidated). *That interpretation bulletin must be carefully reviewed in its detailed entirety, and specialized tax legal advice must be obtained, before income tax deductibility can be assured.*

Typically, the costs paid for the education of a student at The Gregory School for Exceptional Learning will qualify as a medical expense, when a medical doctor or psychologist has certified the student to be a person who, by reason of physical or mental impairment, requires the services of the school. A student suffering from a learning disability or mental impairment, who attends a school, such as The Gregory School for Exceptional Learning, that specializes in the care and education of students who have the same type of problem or disability, is considered to qualify under paragraph 118.2(2)(e), and thus the expenses paid for the student are qualifying medical expenses.