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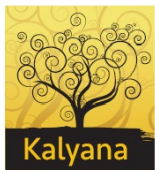
**WEBSITES:** [www.gregoryschool.ca](http://www.gregoryschool.ca)

[www.kalyanasupportsystems.com](http://www.kalyanasupportsystems.com)

Procedures and Policies are filed alphabetically

General Procedures	Health, Safety, and Security	Teaching Procedures
<ul style="list-style-type: none"><li>• Accessibility Standards</li><li>• Attendance</li><li>• Cell Phone Use</li><li>• Client Records</li><li>• Code of Conduct</li><li>• Communication</li><li>• Confidentiality</li><li>• Conflicts of Interest</li><li>• Dress Code</li><li>• Electronic Communication</li><li>• Ethical Relationships</li><li>• Human Resources</li><li>• Inclement Weather Policy</li><li>• Parent Responsibilities</li><li>• Records</li><li>• Service Animals</li><li>• Suspension and Expulsion</li><li>• Tuition Fees</li></ul>	<ul style="list-style-type: none"><li>• Alcohol, Drugs and Related Products (Staff)</li><li>• Alcohol, Drugs and Related Products (Students)</li><li>• Anaphylactic Allergies</li><li>• Bullying</li><li>• Child Abuse</li><li>• Concussion</li><li>• COVID-19 Procedures</li><li>• Emergency Health Plan</li><li>• Fire Safety</li><li>• Health and Safety Measures</li><li>• Injury and Incident Reporting</li><li>• Internet Safety</li><li>• Occupational Health and Safety</li><li>• Physical Intervention</li><li>• Privacy</li><li>• School Security and Lockdown</li><li>• Search</li><li>• Workplace Violence and Harassment</li></ul>	<ul style="list-style-type: none"><li>• Behaviour Management</li><li>• Course Supervision Duties</li><li>• Physical Prompting</li></ul>

For student absences, please use your family channel in SLACK



**PURPOSE** The Gregory School for Exceptional Learning is a full-day private school designed for students with Learning Disabilities, Communication Disorders and Attention Difficulties. Kalyana Support Systems provides intervention based on the principles of Applied Behavioural Analysis. Kalyana is an approved Ontario Autism Program provider.

**VISION** The Gregory School for Exceptional Learning and Kalyana Support Systems is a school community where all individuals continually progress towards their potential, engage in positive social interactions, and realize personal contentment.

**MISSION** The Gregory School for Exceptional Learning and Kalyana Support Systems aim to provide evidence-based ABA treatment to help each child meet their full potential. We work to help families use their child's strengths to realize communication, social, learning, and life-skill goals. We strive to find ways to ensure the children are content throughout their experience with us and attain happiness in their lives.

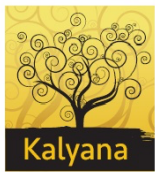
### CORE VALUES

- Servant's Heart
- High Expectations
- Growth Mindset
- Environmental Stewardship

### OPERATING PRINCIPLES

- All student programming is supervised by a behaviour analyst (registered with the College of Psychologists and Behaviour Analysts of Ontario)
- Core educational programming is based on Direct Instruction and Discrete Trial teaching methods and curricula, both founded in the principles of Applied Behavioural Analysis
- Speech Therapy, Occupational Therapy and Physiotherapy are integrated into the classroom setting, when their use is supported by our evidence-based intervention model
- Importance is placed on music experience for the enhancement of student goals
- Physical activity is emphasized throughout the school day
- Social skills/pragmatics are taught through small-group sessions
- Small student-teacher ratios are maintained
- Staff development is greatly valued

**DAILY OPERATIONS** School/Clinic Location: 1249 Colborne Street W, RR #4 Brantford Ontario N3T 0M6  
Hours of Operation - Monday through Friday 8:30 a.m. until 4:00 p.m. (Extended hours available upon request). Home-based sessions may be available upon request.



**INTRODUCTION** The Gregory School for Exceptional Learning and Kalyana Support Systems (GSEL/KSS) are committed to serving all clients, including people with disabilities. The purpose of this policy document is to articulate the practices that are intended to provide equal access to our services for all people, including those with disabilities.

**ASSISTIVE DEVICES AND FEATURES** GSEL/KSS will ensure that our staff is trained and familiar with various assistive devices and features we have onsite or that we provide that may be used by clients or potential clients with disabilities while accessing our services.

**COMMUNICATION** GSEL/KSS will communicate with people with disabilities in ways that take into account their disability.

**SERVICE ANIMALS** We welcome people with disabilities and their service animals. Service animals are allowed on the parts of our premises that are open to the public. Exceptions may include when one of our existing clients has a severe allergy to animals. Please refer to the Service Animals policy later in this Handbook.

**SUPPORT PERSONS** A person with a disability who is accompanied by a support person will be allowed to have that person accompany them on our premises. Potential clients and family and friends of clients may bring their own support onsite. If ongoing clients require support personnel, these details will be discussed as part of their treatment plan and tuition contract.

**DISRUPTION TO SERVICES OR FACILITIES** In the event of a planned or unexpected disruption to services or facilities for clients with disabilities, GSEL/KSS will notify clients promptly. This clearly posted notice will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available. Services/Facilities include: Ramps to enter the building and assistive communication technology. A notice will be made publicly available on our website and at the entrance to our building. In addition, we will notify all current clients via email and any potential clients when making appointments via telephone or email.

**TRAINING** GSEL/KSS will provide accessible client service training to employees, volunteers and others who deal with the public or other third parties on our behalf. Training will also be provided to people involved in the development of policies, plans, practices and procedures related to the provision of our goods and services. Individuals in the following positions will be trained: Principal, Vice-Principal, and Senior Therapist. Staff will be trained on Accessible Customer Service within 30 days of being hired and when changes are made to the accessibility standard policy. Training will include:

- An overview of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard.
- GSEL/KSS plan related to the customer service standard.
- How to interact and communicate with people with various types of disabilities.
- How to interact with people with disabilities who use an assistive device or require the assistance

of a service animal or a support person.

- How to use the equipment or devices available onsite or otherwise that may help with providing goods or services to people with disabilities. These include: ramps and ramp heaters.
- What to do if a person with a disability is having difficulty accessing GSEL/KSS services.

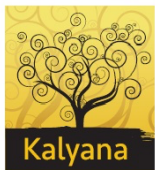
**FEEDBACK** Clients who wish to provide feedback on the way GSEL/KSS provides services to people with disabilities can do so in the follows way(s): in person, in writing, via email, or via telephone. All feedback, including complaints, will be handled in the following manner:

- The Principal and/or Executive Director will review the feedback and provide a reply, in writing or via email. Clients can expect to hear back in 30 days.

**DOCUMENT AVAILABILITY** GSEL/KSS will notify the public that our documents related to accessible customer service are available upon request by posting a notice in the following location(s):

- Reception area at 1249 Colborne Street West

**POLICY REVIEW** Any policy, practice or procedure of our organization that does not respect and promote the principles of dignity, independence, integration and equal opportunity for people with disabilities will be modified or removed.



**PURPOSE** The Gregory School for Exceptional Learning and Kalyana Support Systems is a school community where all individuals continually promote responsible citizenship, safety, well-being, and a positive school environment. This policy sets out expectations and enforcement mechanisms to address the possession, use and provision of alcohol, tobacco, electronic cigarettes, nicotine products, recreational cannabis, alcohol and illegal drugs. Over-the-counter and prescription medications are excepted, provided the medication is used wisely and as intended.

### REGULATIONS

The Smoke-Free Ontario Act, 2017 prohibits smoking (tobacco and cannabis) and the use of electronic cigarettes (vaping) at schools, on school grounds, and all public areas within 20 metres of these grounds. Anyone smoking or vaping on school property is guilty of an offence and if convicted may result in a fine under the Smoke-Free Ontario Act, 2017.

The Smoke-Free Ontario Act, 2017 also prohibits the sale and supply of tobacco or e-cigarettes to anyone under 19 years of age. Anyone who sells or supplies tobacco or an e-cigarette to a student under 19 years of age is guilty of an offence and if convicted may result in a fine under the Smoke-Free Ontario Act, 2017.

**EXPECTATIONS** No person may:

- use, consume or distribute on school premises, in client homes or communicate work settings
- use in a manner that results in impairment during a shift (e.g., consumption at home prior to a shift)
- transport alcohol while in or operating a vehicle during employment hours

### GSEL/KSS RESPONSIBILITIES

- Deal promptly with an actual or perceived alcohol or drug problem in consultation with Human Resources.
- If an employee arrives at the work place appearing to be impaired as a result of alcohol or drug use, GSEL/KSS will make all reasonable efforts to ensure that the employee returns home safely.
- In appropriate circumstances, refer employees affected by substance abuse for counselling and treatment.
- Work with employees who have a prescription for medical marijuana on an individual basis to accommodate their needs without discrimination.
- Conduct alcohol and drug testing of employees working in safety-sensitive positions where there is reasonable cause to believe an employee is unable to work in a safe manner because of the use of alcohol or drugs.
- In so far as it is reasonable, protect the confidentiality and privacy of an employee taking steps to deal with an alcohol or drug dependency problem.
- GSEL/KSS will make all reasonable efforts to ensure attendees at Corporation sponsored functions (where alcohol is available) return home safely.
- Identify unsatisfactory or deteriorating levels of work performance, discuss with employee, and if necessary, together with Human Resources initiate corrective action.
- Monitor employees for fitness for work, including documenting evidence of alcohol or drug use

and/or impairment.

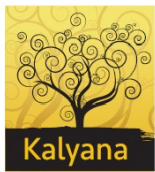
- Take immediate action to remove from the job an employee appearing to be impaired. Impairment is to be judged by a supervisor on the behaviour or performance of an employee that suggests consumption or impairment by alcohol or drugs.
- Take immediate action to remove from the premises a parent or community member appearing to be impaired. Impairment is to be judged by a supervisor on the behaviour or performance of an employee that suggests consumption or impairment by alcohol or drugs.
- Upon removing an employee from the job, arrange to transport the employee home (i.e. drive the employee home; contact a spouse, family member or other individual to transport the employee home; and failing that, arrange for a taxi).

## **STAFF RESPONSIBILITIES**

- Read and understand this policy; perform job in a safe manner in accordance with this policy.
- Disclose a present or past (within the last six years) substance dependency problem upon application for employment.
- Seek counselling and accept the necessary treatment as prescribed for an emerging alcohol or drug problem before the problem adversely affects job performance.
- Follow any recommended monitoring or follow-up program as part of rehabilitation from an alcohol or drug dependency.
- Disclose a prescription for medical marijuana if accommodations are needed to prevent impairment at work. GSEL/KSS will work with employees on an individual basis to find the best solution for both parties.
- Report any possible impairment of a co-worker to management.
- Cooperate fully during investigations related to this policy. This may include submitting to an alcohol and drug test, if requested, based on reasonable cause or following an accident (including a motor vehicle accident), near miss or other potentially dangerous incident.

## **RELATED POLICIES**

- Occupational Health and Safety
- Code of Conduct
- Alcohol, Drug and Related Products Policy (Student)



**PURPOSE** The Gregory School for Exceptional Learning and Kalyana Support Systems is a school community where all individuals continually promote responsible citizenship, safety, well-being, and a positive school environment. This policy sets out expectations and enforcement mechanisms to address the possession, use and provision of alcohol, tobacco, electronic cigarettes, nicotine products, recreational cannabis, alcohol and illegal drugs.

#### **REGULATIONS**

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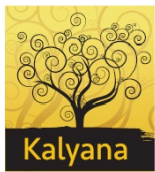
The Smoke-Free Ontario Act, 2017 also prohibits the sale and supply of tobacco or e-cigarettes to anyone under 19 years of age. Anyone who sells or supplies tobacco or an e-cigarette to a student under 19 years of age is guilty of an offence and if convicted may result in a fine under the Smoke-Free Ontario Act, 2017.

**CONSEQUENCES** Students caught in possession of alcohol, drugs, vaping, tobacco and/or related products

- must surrender the item(s) to the school administrator
- will have their parents notified
- will receive support to learn appropriate behaviours and make choices that support their continued participation in learning
- may be reported to law enforcement agents

#### **RELATED POLICIES**

- Code of Conduct
- Alcohol and Drug Policy (Staff)



**PURPOSE** The purpose of this policy document is to articulate the practices that are intended to protect students with anaphylactic allergies. This policy complies with "Sabrina's Law, 2005."

**DEFINITION OF ANAPHYLAXIS** "Anaphylaxis" means a severe systemic allergic reaction that can be fatal, resulting in circulatory collapse or shock, and "anaphylactic" has a corresponding meaning

**REDUCING THE RISK OF EXPOSURE** Strategies will be enacted to reduce the risk of exposure to anaphylactic causative agents in the school whenever a student who is known to have an anaphylactic allergy is enrolled. These strategies include:

- Avoiding contamination of the school premises with the causative agents.
- Educating staff members and students about the causative agents.

**DISSEMINATION OF INFORMATION** Information on life-threatening allergies affecting students enrolled will be disseminated to parents, students and staff members via the Parent Handbook, Staff Handbook and/or memory. Information will also be posted in prominent places such as the office, staff room, and lunchroom.

**STAFF TRAINING** Training on dealing with life-threatening allergies will be provided for all employees as part of the pre-service training and as refresher-training twice yearly within regular staff meetings.

**INDIVIDUAL PLANS** The principal will ensure, upon registration, that parents, guardians and students shall be asked to supply information on life-threatening allergies. The principal will develop an individual plan for each student who has an anaphylactic allergy. A copy of the plan will be posted in a prominent location, a copy will be placed in the "Emergency Contact Information" binder, and a copy will be placed in the student's "Supporting Documents" (blue) folder. This plan will contain:

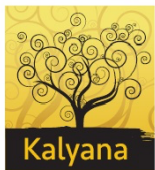
- Details informing staff members and others who are in regular contact with the student of the type of allergy, monitoring and avoidance strategies, and appropriate treatment.
- A readily accessible emergency procedure for the student, including emergency contact information, prescriptions and instructions from the student's physician or parent.
- Storage for epinephrine auto-injectors, where necessary.

**ADMINISTRATION OF MEDICATION** Staff members may be preauthorized to administer medication if outlined in the student's Individual Plan. If a staff member has reason to believe that a student is experiencing an anaphylactic reaction, the staff member may administer an epinephrine auto-injector or other medication prescribed to the student, even if there is no preauthorization to do so.

**IMMUNITY** No action for damages shall be instituted respecting any act done in good faith or for any neglect or default in good faith in response to an anaphylactic reaction in accordance with "Sabrina's Law."

**OBLIGATION OF THE PARENTS** It is the obligation of the student's parent or guardian to ensure that the information in the student's file is kept current with the medication the student is taking.





**PURPOSE** The purpose of this policy document is to let parents know when a child should be kept home from The Gregory School for Exceptional Learning and Kalyana Support Systems (GSEL/KSS). By keeping children home when they are ill, they can recover faster and prevent the spreading of illness.

**GUIDELINES** Your child should not attend GSEL/KSS if they are suffering from the following symptoms:

- A fever above 38.5°C or 101.3°F
- A diarrhea incident
- A vomiting incident

If your child is suffering from any or all of the above symptoms, please do not send them to the facility. GSEL/KSS strives to prevent illnesses and the above symptoms can allow for the spreading of infections and compromised hygiene. Please wait at least 24 hours after the last episode before sending your child back to GSEL/KSS. (<http://www.healthline.com/health/cold-flu/school-sickdays#15>)

If a child becomes ill during the school day with the following symptoms, they will be sent home following a call to parents or their emergency contact:

- 1 incidence of vomiting (unless not illness related)
- 2 incidences of diarrhea within 1 day

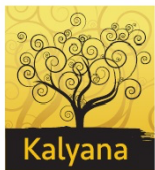
**STUDENT ABSENCES** *Families should use their SLACK family channel to communicate illness notifications. Administrative staff will send a confirmation when we have received your notification.*

**PEDICULOSIS (HEAD LICE)** As per the Grand Erie District School Board, the Haldimand-Norfolk Health Unit, and the Brant County Health Unit, students with head lice or nits will not be allowed to attend GSEL/KSS until it is treated and eradicated. Nits are very tiny eggs, half the size of a pinhead and oval in shape. They may look like dandruff but they are firmly glued to the hair and cannot be flicked off. New eggs, which are close to the scalp, are tan coloured and are difficult to see. Nits that are farther away from the scalp appear white. Nits are most often found above and behind the ears, at the nape of the neck at the crown of the head.

To check for head lice, please follow this procedure:

- Examine the head under natural bright light. Head lice may be hard to detect because they move quickly and are very small.
- It is helpful to examine the head from different angles or light. This is easily achieved by moving around the child/adult while examining. Newly laid eggs are almost transparent.
- Part the hair and closely examine the scalp, especially the nape of the neck, behind the ears and the crown of the head.
- To find the eggs, look for small white or yellowish-brown specks that are about the size of a poppy seed. You may see lice quickly moving away from the sunlight.
- To tell the difference between eggs and dandruff, try to dislodge them from the hair shaft. If they are not easily removed, they are probably eggs.

Treating head lice requires at least two treatments one week apart. Get a head lice shampoo, cream rinse or lotion from your drugstore. Read the directions carefully and follow them exactly. Remove all of the nits. Head lice products kill many of the nits, but not all of them. Apply a second treatment in one week. Continue to check the head and remove any remaining nits. To remove nits, work in a brightly lit area - bright sunlight is best. After treatment, comb and part the hair in small sections. Use your thumbnail against your first finger to strip the nits from the hair starting from the roots right down to the tips. Place the nits in a bag and throw them out. You can also comb out the nits holding a fine-tooth comb on a downward angle. Special combs are available at the drugstore. Once treatment has been completed and all nits and eggs have been removed, your child may return to GSEL/KSS.



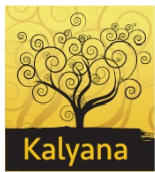
**GENERAL PHILOSOPHY AND PRACTICES** It is The Gregory School for Exceptional Learning and Kalyana Support Systems's philosophy that the most effective way to teach and maintain appropriate behaviour is by reinforcing it when it occurs. We will:

- "Catch the students being good"
- Provide frequent and specific praise for good behaviour.
- Speak with a positive, encouraging tone.
- Avoid the use of negatives (e.g. "Don't do \_\_\_\_") and an angry-sounding voice, in order to reserve these for the more serious offences. Children will habituate to the regular use of negative tone-of-voice and it will become less powerful as a consequence.
- Not repeat instructions or "nag". If a student does not follow through with instruction the first time, we can use a physical or visual prompt. Verbal prompts such as "What do you need to do now?" or "What did I say?" can also be used.
- Provide greater reinforcement for immediate follow through.
- Provide lesser reinforcement for follow-through after a prompt.

**STRATEGIES** The following items are descriptions of main strategies we may employ to encourage appropriate behaviour:

- "Caught Being Great" - Student will be praised frequently for exhibiting desired behaviours. Students can cash in their tickets for access to reinforcers (e.g. play time).
- Proactive reminders - We remind children frequently of desired behaviours (before they are required). E.g. Before dismissing for recess, we may say, "Let's remember to walk down the hall quietly." Whenever possible, we like to phrase instructions in the positive ("Let's do \_\_\_\_," rather than "Don't do \_\_\_\_").
- Delivering consequences - Teachers will explain what the student was expected to do, what the student did and what the consequence will be.
- Acceptable punishments - E.g. Shortened recess/break, removal of preferred activity, and performance of an additional task.

**PROCEDURES FOR SERIOUS AND/OR RECURRING INCIDENTS OF BEHAVIOUR** To ensure the effecting management of student behaviour, Baseline data and functional assessment information will be gathered prior to the implementation of any intervention. Team Leaders are responsible for initiating the gathering of data and sharing the results with the program supervisor. A Behaviour Support Plan will be created for any student who requires an intervention for the reduction of inappropriate behaviour and/or the teaching of appropriate behaviour. Parents will sign off on all behaviour plans and a copy will be placed in the student's digital and paper record. Staff members should review the plans regularly to ensure consistent maintenance of the program.



**INTRODUCTION** This policy on Bullying Prevention and Intervention is in accordance with Ontario Ministry of Education Policy/Program Memorandum No.144. The main statements of this policy are:

- Bullying adversely affects students' ability to learn
- Bullying adversely affects healthy relationships and the school climate
- Bullying adversely affects a school's ability to educate its students
- Bullying will not be accepted on school property, at school-related activities, in school transportation vehicles, or in any other circumstances (e.g. online) where engaging in bullying will have a negative impact on the school climate

**DEFINITIONS AND INFORMATION** Bullying is typically a form of repeated, persistent, and aggressive behaviour directed at an individual or individuals that is intended to cause (or should be known to cause) fear and distress and/or harm to another person's body, feelings, self-esteem, or reputation. Bullying occurs in a context where there is a real or perceived power imbalance.

Students may attain or maintain power over others in the school through real or perceived differences. Some areas of difference may be size, strength, age, intelligence, economic status, social status, solidarity of peer group, religion, ethnicity, disability, need for special education, sexual orientation, family circumstances, gender, and race.

Bullying is a dynamic of unhealthy interaction that can take many forms. It can be physical (e.g. hitting, pushing, tripping), verbal (e.g. name calling, mocking, or making sexist, racist, or homophobic comments), or social (e.g. excluding others from a group, spreading gossip or rumours). It may also occur through the use of technology (e.g. spreading rumours, images, or hurtful comments through the use of email, cellphones, text messaging, Internet websites, or other technology).

**PREVENTION STRATEGIES: RECOGNIZING THE RISK OR BULLYING AND ACTIVE BULLYING** Bullying behaviours can begin in pre-school. The child who aggressively takes toys from peers, the aggressive hitter and biter, or the child who must be included in every game may be exhibiting early bullying behaviour. A recent retrospective examination of children's early home environments indicates that children who watched television significantly more than the mean viewing time of 3.5 hours per day had a 25% increase in the probability of being described as a bully by the child's mother at ages 6-11 years old. Children who received emotional support from their parents in early years were 33% less likely to be described as bullies in later years.

Although the prevalence of bullying may be greater in elementary school, the severity of bullying behaviours escalates in middle schools. Boys, mostly boys of physically larger stature, typically engage in physical acts of bullying, including body-checking, pushing, shoving, extortion, and robbery. Girls typically use indirect or relational strategies, such as gossiping, shunning, or starting rumours. However, both sexes use both forms of bullying.

A recent addition to the bullies' repertoire is "cyber-bullying," the use of technology as a bullying weapon. Cyber-bullying can occur via Internet postings on webpages, in chat rooms, or in emails and other technology-mediated messaging systems. Instant messaging is a popular tool, as are text messages on cellular telephones. The cyber-bullying consists of insults, "trash talk," threats, gossip, the starting of sexual or gender orientation rumours, or compromising photographs taken with camera phones, all directed at the victim. For middle school students in particular, the desire to be part of the "in" group prompts victims to access and accept postings and messages even when they have reasonable notice that the messages are targeting them. Since cyber-bullying often originates outside of school, protected by the anonymity of the Internet or of cell phones, cyber-bullying is hard to monitor or eradicate.

**PREVENTION STRATEGIES: IDENTIFYING POTENTIAL OR ACTUAL BULLIES** Identifying a bully is not an easy task. Bullies often present an engaging and appealing demeanour to adults, effectively diverting adult suspicion, at least initially. Psychologists, psychiatrists, medical doctors, and educational personnel agree that there is no typical bully. However, the most prevalent characteristics of bullies include the following:

- Controlling others through verbal threats and force
- Quick to anger and resort to force sooner than others
- Have little empathy for the problems of others
- Inappropriately perceive hostile intent in the actions of others
- See aggression as the only way to preserve their self-image
- Inconsistent discipline at home, or parents who often do not know their whereabouts
- May suffer physical and emotional abuse at home
- Exhibit obsessive or rigid actions

**PREVENTION STRATEGIES: MAINTAINING A POSITIVE SCHOOL CLIMATE** The Gregory School for Exceptional Learning and Kalyana Support Systems (GSEL/KSS) will support and maintain a positive school climate, as measured by the following characteristics:

- Students and staff feel safe and are safe
- Healthy and inclusive relationships are promoted
- Students are encouraged to be positive leaders in their school community
- All school community partners are actively engaged
- Bullying prevention messages are reinforced through programs addressing discrimination based on such factors as age, race, sexual orientation, gender, faith, disability, ethnicity, and socio-economic disadvantage
- Improvement of learning outcomes for all students is emphasized

GSEL/KSS teaching strategies support this bullying prevention and intervention policy, by including bullying prevention in daily classroom teaching (e.g. by including books that deal with bullying on reading lists). These strategies also focus on developing healthy relationships by including bullying prevention throughout the curriculum in daily classroom teaching.

**INTERVENTION STRATEGIES** Incidents of bullying will be addressed with appropriate and timely responses. Intervention will be consistent with a progressive discipline approach. Intervention strategies could range from early interventions to more intensive interventions in cases of persistent bullying, with possible referral to community or social service agencies. Ongoing interventions may be necessary to sustain and promote positive student behaviour. The following mitigating factors shall be taken into

account:

- The student does not have the ability to control his or her behaviour
- The student does not have the ability to understand the foreseeable consequences of his or her behaviour
- The student's continuing presence in the school does not create an unacceptable risk to the safety of any person

GSEL/KSS allows and encourages all students to report bullying incidents safely and in a way that will minimize the possibility of reprisal, through confidential communications to any and all school staff. In recognition of the importance of addressing bullying, which can have a significant impact on student safety, learning, and the school climate, bullying has been added to the list of infractions for which suspension or expulsion will be considered. In considering suspension or expulsion, the following other factors shall also be taken into account:

- The student's history
- Whether a progressive discipline approach has been used with the student
- Whether the activity for which the student may be or is being suspended or expelled was related to any harassment of the student because of his or her race, ethnic origin, religion, disability, gender or sexual orientation or any other harassment
- How the suspension or expulsion would affect the student's ongoing education
- The age of the student
- In the case of a student for whom an individual education plan has been developed:
  - Whether the behaviour was a manifestation of a disability identified in the student's individual education plan
  - Whether appropriate individualized 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

**TRAINING FOR MEMBERS OF THE SCHOOL COMMUNITY** Most bullying occurs in schools, rather than on the way to and from schools. The frequency and severity of bullying is inversely related to the degree of supervision present; that is, more, and more severe, bullying occurs where supervision is least. Playgrounds and schoolyards are areas preferred by bullies. Bullying also occurs in the cafeteria, in lines, in bathrooms, and in classrooms, even when teachers are present. Schools in which the teacher and administrators talk about bullying and monitor its occurrence have fewer bullying incidents. Schools organized as communities, with a common set of goals and norms, have stronger peer relationships and fewer bullying incidents. Students in these communal schools feel a greater bond to the school, to teachers, and to each other, making bullying less likely.

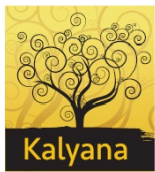
GSEL/KSS training strategies for all administrators, teachers, and instructor on bullying prevention and intervention include training on specific prevention and reaction strategies, as outlined in the appendices.

**DISSEMINATION** This bullying prevention and intervention policy will be communicated:

- In writing to parents via the Policies and Procedures Handbook.
- In writing to all employees and volunteers via the Policies and Procedures Handbook.
- Verbally to all staff, as necessary.
- Verbally to students, as deemed appropriate by the staff and as directed by the principal.

**POLICY REVIEW** GSEL/KSS annually reviews the effectiveness of this bullying prevention and intervention policy by indicators such as, but not necessarily including:

- An analysis of the school climate through anonymous surveys of students, staff members, and parents provided by their schools (these surveys should be done on a regular cycle).
- Performance indicators for monitoring, reviewing, and evaluating the effectiveness of this bullying prevention and intervention.



**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.

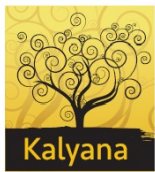
**PROCEDURES FOR PREVENTING BULLYING EVENTS** We strive to prevent bullying. Staff members will:

- 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** The Gregory School for Exceptional Learning and Kalyana Support Systems is a school community where all individuals continually promote responsible citizenship, safety, well-being, and a positive school environment. This policy sets out expectations and enforcement mechanisms to address the use of cell phones by students.

### REGULATIONS

Policy/Program Memorandum No. 128: The Provincial Code of Conduct and School Board Codes of Conduct

**EXPECTATIONS** All members of the school community must not use personal mobile devices during instructional time except under the following circumstances

- for educational purposes, as directed by an educator
- for health and medical purposes
- to support special education

All students must have personal mobile devices stored out of view and powered off or set to silent mode through out the full instructional day, except when their use is explicitly permitted by the educator under the circumstances outlined above.

Specific permissions for teachers include:

- To note the time (clock feature)
- To use a timer, interval timer, or related app
- To read or make notes related to student programming on Slack

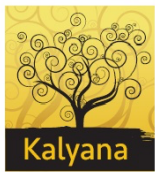
Specific restrictions for teachers include, except during unpaid lunch breaks and other unpaid time periods:

- Personal communication
- Leisure activities (e.g. videos, games or apps)

**CONSEQUENCES** If a student has in view, or is using, a personal mobile device without express permission from a teacher, they must hand in the device for the instructional day and the device must be placed, by the student, in a storage area in a location designated by the principal. If the student does not hand in a device when required, the principal has discretion to consider a range of responses to address this behaviour, including suspension. If a teacher uses any electronic device for a purpose not permitted within this policy, progressive discipline action will be enacted, as per the employment contract.

### RELATED POLICIES

- Code of Conduct
- Behaviour Management
- Suspension and Expulsion



**PURPOSE** The Gregory School for Exceptional Learning and Kalyana Support Systems endorses a supportive school environment that is safe and secure for all students and staff. The school does not permit any person to intentionally harm a student by physical, sexual or emotional means or by the failure to provide adequate care for, supervise or protect a child.

**SOURCES** The information within this document has been extracted from several sources:

- The Handbook for School Personnel, Metropolitan Toronto Special Committee on Child Abuse, preventative education program.
- Child Abuse Policy from Bishop Hamilton School in Ottawa ON, courtesy of Elaine Hopkins.
- Child Abuse Policy from Pinehurst School in St. Catharines ON, courtesy of Dave Bird.

**DEFINITIONS** For the purpose of this document, *Staff Members* includes all adults working in any capacity within The Gregory School for Exceptional Learning and Kalyana Support Systems. The following definitions have been extracted from The Handbook for School Personnel, Metropolitan Toronto Special Committee on Child Abuse, preventative education program.

- Child abuse is any form of physical harm, emotional deprivation, neglect or sexual mistreatment that can result in injury or psychological damage to a child
- Physical abuse occurs when the person(s) responsible for the child's care, inflicts or allows being inflicted any injury upon the child
- Emotional abuse or psychological maltreatment occurs when the person(s) responsible for the child's care either subjects the child to or permits the child to be subjected to chronic and persistent ridiculing, rejecting, isolating, terrorizing, ignoring or corrupting behaviour. Examples of emotional abuse include, but are not limited to:
  - Chronically ridiculed, degraded, criticized or humiliated
  - Habitually ignored or rejected in preference for other children (making cruel remarks such as "you're no good" or "I wish you'd never been born")
  - Subjected to frightening punishment such as being locked in a closet
  - Enticed, bribed or forced into self-destructive behaviour (e.g. drugs, alcohol)
  - Treated as a scapegoat (consistently blaming a child for that which has gone wrong)
  - Witnessing violence in the family home between parents and/or other family members
- Neglect occurs when the person(s) responsible for the childcare jeopardizes that care or well being through deprivation of necessities such as:
  - Supervision appropriate for the child's age, mental/psychological or physical
  - Adequate and nourishing food
  - Healthy and clean living environment
  - Medical, educational and recreational facilities appropriate to age and condition
- Child sexual abuse refers to the use of a child by an adult for sexual purposes whether consensual or not. It includes acts of exposure; sexual touching; oral, anal or vaginal penetration; and the exposing of a child to or involving a child in pornography or prostitution. Any form of direct sexual contact between child and an adult is abusive since it is motivated purely by adult needs and involves a child who by virtue of his or her age and position in life is unable to give consent.

**LEGAL REGULATIONS** In terms of *Physical Intervention*, we are governed by the following policies:

- Section 264(1) of the Education Act requires a teacher to maintain, under the direction of the Principal, proper order and discipline in the teacher's classroom and while on duty in the school and on the school ground.
- Correspondingly, Section 23(1)(c) of Regulation 262 of the Education Act requires a student to accept such discipline as would be exercised by a kind, firm and judicious parent. As an absolute last resort to effect these requirements, Section 43 of the Criminal Code provides that every teacher is justified in using force by way of correction toward a student under the age of majority who is under his or her care, only if the force does not exceed what is reasonable under the circumstances. *Note that any force that could objectively result in injuries endangering life, limbs, health or disfigurement is unquestionably unreasonable, and will expose the teacher to criminal responsibility.*
- The Ontario College of Teachers Act, by regulation, prohibits such professional misconduct, which includes abusing a student physically, sexually, verbally, psychologically or emotionally.

We have a *duty to report suspected abuse*. A teacher also commits professional misconduct by failing to comply with the teacher's duty pursuant to the Child and Family Services Act. As of April 1st, 2000, the Child and Family Services Act (see, in particular, Sections 37 and 72) now requires teachers, who in the course of their professional or official duties, have reasonable grounds to suspect that a child (16 years or less) is or may be suffering or may have suffered abuse to forthwith report the suspicion and the information on which it is based to a children's aid society. The teacher must now personally make the report to the local Children's Aid Society, and not through the Principal. There is also now an ongoing duty to report additional suspicions. Each additional situation involving 'reasonable grounds to suspect' must be reported, even if a previous report has been made with respect to the same child. Failure to so report can result in a conviction, and a fine of up to \$1,000. As directed by Ontario Ministry of Education Policy/ Program Memorandum No. 9 (August 10th, 2001), it is the responsibility of the children's aid society and, if necessary, the police to conduct an investigation into the possibility that a child is in need of protection. Gregory School staff members who suspect that a child is or may be in need of protection will not conduct an investigation regarding their suspicions or the disclosures of the child, and shall question the child only to clarify the nature of the complaint.

We also have a *duty to report a suspected abuser*. The Student Protection Act, 2002, provides further protection for students. That legislation requires the Principal to promptly report to the Ontario College of Teachers in writing when the principal becomes aware that a member who is or has been employed by The Gregory School for Exceptional Learning, (a) has been charged with or convicted of an offence under the Criminal Code (Canada) involving sexual conduct and minors; (b) has been charged with or convicted of an offence under the Criminal Code (Canada) that in the opinion of the Principal indicates that students may be at risk of harm or injury; or (c) has engaged in conduct or taken action that, in the opinion of the Principal, should be reviewed by a committee of the college. Sexual conduct can involve sexual intercourse or other forms of physical sexual relations between the staff member and the student; touching, of a sexual nature, of the student by the staff member; or behaviour or remarks of a sexual nature by the staff member towards the student.

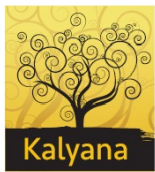
The Gregory School for Exceptional Learning will *terminate the duties for a suspected abuser*. It is also The Gregory School's policy and practice to voluntarily enforce the Education Act Section 170 (1) (12.1), which requires the Principal, on becoming aware that a staff member has been charged with or convicted of an offence under the Criminal Code (Canada) involving sexual conduct and minors, or of any other offence under the Criminal Code (Canada) that in the opinion of the Principal indicates that students may be at risk, take prompt steps to ensure that the staff member performs no duties in the classroom and no duties involving contact with students, pending withdrawal of the charge, discharge following a preliminary inquiry, stay of the charge or acquittal, as the case may be.

**PROCEDURES TO PROTECT THE CHILD** The following are the procedures we have in place:

- Know the Signs - Staff member must familiarize themselves with the possible indicators of abuse. These indicators are fully described in the appendix to this policy.
- Report the Suspected Abuser - A staff member who has reasonable grounds to suspect abuse of any form must make a report personally to the Children's Aid Society. The report must be made as soon as possible. Delaying reports even slightly can affect the evidence that may be subsequently obtained by the Children's Aid Society to aid in their investigation. The staff member who has the grounds to suspect abuse may not have the principal or another staff member make the report in his/her place. It is not the responsibility, nor the right, of the staff member to make investigations of his or her own prior to reporting the incident. The staff member must advise the Principal of the report being made to the Children's Aid Society at the time the report is being made or as soon afterwards as possible.
- Record Incidents - Staff members must document any incidents that may not provide reasonable grounds in isolation, but may lend evidence that would lead to a reasonable suspicion of abuse in the future. Examples of such an incident would be the observation of unusual bruising on a child. One occurrence of bruising may not be reasonable grounds to suspect abuse, while several may be. Staff members should also document any report made to the Children's Aid Society. The outcome of the Society's investigation should also be documented.
- Criminal Record Checks - Staff members provide a Criminal Reference Check to the principal upon their hire.

**PROCEDURES TO PROTECT ADULTS FROM WRONGFUL ACCUSATIONS** The following are the procedures we have in place:

- Limit Risk:
  - When possible, staff members should not be alone with a single student.
  - When a student's programming requires that a significant amount of time be spent alone with a teacher, the student's parents will be made aware of the situation.
  - Staff members should take precautions such as leaving classroom doors open and/or checking in with other staff members occasionally.
  - Staff members should ensure that affectionate contact with students (e.g. hugs) doesn't become excessive.
- Document Incidents - Staff members should document any incident that may later be interpreted as abuse (e.g. Physical Intervention - please refer, also, to the Physical Intervention Policy for more information).



**PURPOSE** 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
- Criminal or anti-social 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:

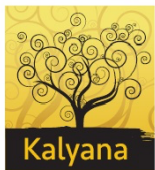
- Unusual sexual knowledge
- Persistent and inappropriate sexual play for the child's age and developmental level (including sexual play with toys)
- Sexualized expression of affection
- Excessive masturbation/self-stimulation
- Simulated sexual acts with siblings or friends or sexual attention to pets 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





**INDIVIDUALIZED SERVICE PLAN (ISP)** An ISP will be created for each client within six weeks, typically, of enrolment and updated every 6-9 months, or when necessary. There will be a copy of a student's ISP in the client's electronic and paper record files. There will also be a copy in the client's program binder. Staff members will review the ISPs regularly to ensure consistent maintenance of the student's programming.

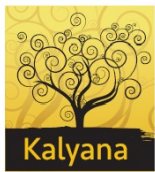
**REPORT CARDS** The ISP serves as both an individualized plan and progress update (report card). ISPs are updated and reviewed with families every 6-9 months.

**DAILY RECORD KEEPING** In accordance with the Behaviour Analyst Certification Board's ethical guidelines (BACB, 2016), data collection procedures are in effect for all instructional goals.

**PERMANENT STUDENT FILES** Electronic and paper document files are stored securely. These files may contain individual service plans, assessment notes, therapy notes, and meeting notes. The Ontario Student Records (OSR) are maintained for students under the provisions outlined in the Education Act. Client documentation will be kept for a minimum of 7 years or until the client's 28th birthday.

### References

Behaviour Analysts Certification Board Inc. (2014). *Professional and Ethical Compliance Code for Behaviour Analysts*. Retrieved from [http://bacb.com/wp-content/uploads/2015/05/BACB\\_Compliance\\_Code.pdf](http://bacb.com/wp-content/uploads/2015/05/BACB_Compliance_Code.pdf)



**PURPOSE** The Gregory School for Exceptional Learning and Kalyana Support Systems exists to educate students with various special needs. Our Code of Conduct will aid in defining the opportunity for a safe and secure learning environment.

**APPLICATION** This Code of Conduct of our organization applies to all persons involved with the school, including, but not limited to:

- Staff/Consultants/Volunteers/Parents/Guardians share the responsibility for complying with the behavioural expectations set out in the Code to ensure that the school is a positive environment for all and to set an example of desirable values of citizenship for the students. They also share the responsibility for developing and enforcing the behavioural expectations of the school.
- Parents/Guardians have the additional responsibility of supporting their child in establishing good work habits and behaviours in the home. They also need to support the behavioural expectations of the school at home to ensure consistency and continuity.
- Students are responsible for complying with the expectations of the Code; and where appropriate, they can take an active part in the development of the expectations and the consequences of the Code.

**THE CODE** A safe and secure environment allows for a positive learning environment. In turn, a positive learning environment promotes student learning. To successfully achieve these outcomes, it is necessary to develop a clear set of expectations. They are as follows:

- Meet the standards of good citizenship
  - Respect authority, self and others in words and action
  - Respect the personal property of others as well as the facility and materials of the school
    - If damage occurs, it is a natural consequence that those responsible will be held accountable for charges to repair or replace
  - Adhere to the law
  - Treat others fairly
  - Communicate with sensitivity
  - Respect the rights and freedoms of others
- Support/promote the philosophies, policies and decisions of the school
  - Adhere to the rules of the school
  - Comply with the consequences of rules not followed
- Follow conventions that support a learning environment
  - Be present when required and be punctual
  - Have a positive attitude about learning
  - Make a daily commitment to achieving your own potential and that of others in your care
  - Fulfill your own responsibilities and assist others in fulfilling theirs when necessary

Failure to adhere to the standards set out in this Code of Conduct will warrant a written notification, which may be followed by a request of the individual to terminate its relationship with the School.

**STRATEGIES FOR A SAFE LEARNING ENVIRONMENT** The following are the strategies that our organization employs to promote a safe learning environment at our facility:

- Establish a positive school climate
- Promote social skills development
- Use problem solving techniques with staff, consultants, parents and students
- Develop alternative learning programs to assist students with their education plans/needs

**EXAMPLES OF UNACCEPTABLE BEHAVIOUR** The following is a non-exhaustive list of unacceptable behaviours:

- Bullying
- Bad language
- Aggressive behaviour
- Destructive behaviour
- Insubordination
- Drug/alcohol possession, sharing or selling
- Emotional/physical/sexual abuse
- Use of a personal mobile device during class unless permitted by an instructor

**CONSEQUENCES OF UNACCEPTABLE BEHAVIOUR FROM A STUDENT** We understand that unacceptable behaviour occurs occasionally. The following are the consequences that we employ with our students:

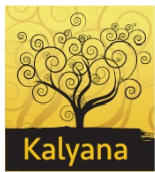
- Temporary removal of privileges
- Removal from class to a supervised time-out location
- Formal warning by School Administrator
- Notification to the parent
- Out of school suspension with an appropriate and clear return to school protocol

**CONSEQUENCES OF UNACCEPTABLE BEHAVIOUR FROM AN ADULT** The following are the consequences we employ with adults working in and around the school:

- Written notice from School Administrator
- Removal from premises (temporary/permanent)

**RELATED POLICIES** Please refer to any of the following policies for more information:

- Bullying Policy
- Child Abuse Policy
- Discipline Policy
- Policy Relating to Alcohol, Tobacco, Electronic Cigarettes, Recreational Cannabis and Related Products, and Illegal Drugs
- Personal Mobile Device Policy



**PURPOSE** The purpose of this policy document is to outline the methods of appropriate communication between all parties involved in The Gregory School for Exceptional Learning and Kalyana Support Systems.

**IN-PERSON COMMUNICATION BETWEEN HOME AND SCHOOL/CLINIC** The following are the methods we employ to communicate between students/parents and the school/clinic:

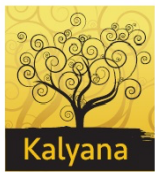
- Meetings with school staff, consultants and parents generally occur upon enrolment and every 6 months thereafter, for the purpose of discussing individual service plans. Additional meetings for purposes that include, but are not limited to, reviewing behaviour support plans and providing parent training are arranged as required.
- Additional conversations between staff and parents outside of arranged meeting times should be as brief as possible and limited to times that don't infringe on the teacher's ability to supervise or teach the students.

**COMMUNICATION BETWEEN STAFF** The following are the methods we employ to communicate between staff members and between staff members and Administration:

- Memos will be delivered to staff via SLACK.
- Staff meetings will occur on a regular basis, or as needed.
- Team meetings will be held on a regular rotation, or as needed.

**PLEASE REFER, ALSO, TO THE ELECTRONIC COMMUNICATION POLICY**

*Policy Reviewed October 2023*



**INTRODUCTION** This policy on concussion is developed and maintained in accordance with Ontario Ministry of Education Policy/Program Memorandum No. 158: School Board Policies on Concussion. The purpose of this policy is to educate the community of The Gregory School for Exceptional Learning and Kalyana Support Systems about the risks and duties with respect to Concussion. This policy will be shared with students, parents, school employees, administrators, educators, school staff, volunteers, doctors and nurse practitioners, and community-based organizations. Where practicable and relevant, this policy will be integrated into the curriculum. This policy will also be shared with organizations that use the school facilities, such as community sports organizations and licensed child-care providers.

**CONTEXT** Recent research has made it clear that a concussion can have a significant impact on a student's cognitive and physical abilities. In fact, research shows that activities that require concentration can actually cause a student's concussion symptoms to reappear or worsen. It is equally important to develop strategies to assist students as they "return to learn" in the classroom as it is to develop strategies to assist them "return to physical activity". Without addressing identification and proper management, a concussion can result in permanent brain damage and in rare occasions, even death.

Research also suggests that a child or youth who suffers a second concussion before he or she is symptom free from the first concussion is susceptible to a prolonged period of recovery, and possibly Second Impact Syndrome – a rare condition that causes rapid and severe brain swelling and often catastrophic results.

Administrators, educators (including occasional teachers), school staff, students, parents and school volunteers play an important role in the prevention of concussion, identification of a suspected concussion, as well as the ongoing monitoring and management of a student with a concussion.

**DEFINITION** A concussion:

- is a brain injury that causes changes in how the brain functions, leading to symptoms that can be physical (e.g. headaches, dizziness), cognitive (e.g. difficulty concentrating or remembering), emotional/behavioural (e.g. depression, irritability), and/or related to sleep (e.g. drowsiness, difficulty falling asleep).
- may be caused either by a direct blow to the head, face or neck, or a blow to the body that transmits a force to the head that causes the brain to move rapidly within the skull.
- can occur even if there has been no loss of consciousness (in fact, most concussions occur without a loss of consciousness).
- cannot normally be seen on x-rays, standard CT scans or MRIs.

**DIAGNOSIS** A concussion is a clinical diagnosis made by a medical doctor or nurse practitioner. It is critical that a student with a suspected concussion be examined by a medical doctor or nurse practitioner.

**PREVENTION** Any time a student/athlete is involved in physical activity, there is a chance of sustaining a concussion. Therefore it is important to take a preventative approach; encouraging a culture of safety mindedness when students are physically active. One approach to the prevention of any type of injury includes primary, secondary and tertiary strategies. Listed below are these three strategies for concussion injury prevention:

- Primary - information/actions that prevent concussions from happening (e.g., rules and regulations, minimizing slips and falls by checking that classroom floor and activity environments provide for safe traction and are obstacle free).
- Secondary - expert management of a concussion that has occurred (e.g., Identification, and Management - Return to Learn and Return to Physical Activity) that is designed to prevent the worsening of a concussion.
- Tertiary - strategies that help prevent long-term complications of a concussion (chronic traumatic encephalopathy) by advising the participant to permanently discontinue a physical activity/sport based on evidence-based guidelines.

**IDENTIFICATION** If a student receives a blow to the head, face or neck, or a blow to the body that transmits a force to the head that causes the brain to move rapidly within the skull, and as a result may have suffered a concussion, the individual (e.g., teacher/coach) responsible for that student must take immediate action as follows:

- Unresponsive student (or where there was any loss of responsiveness)
  - Stop the activity immediately, assume there is a concussion.
  - Initiate Emergency Action Plan and call 911. Do not move the student.
  - Assume there is a possible neck injury and, only if trained, immobilize the student before emergency medical services arrive.
  - Do not remove athletic equipment (e.g. helmet) unless there is difficulty breathing.
  - Stay with the student until emergency medical services arrive.
  - Contact the student's parent/guardian (or emergency contact) to inform them of the incident and that emergency medical services have been contacted.
  - Monitor and document any changes (i.e. physical, cognitive, emotional/behavioural) in the student.
  - Refer to the school's injury report form for documentation procedures.
  - If the student regains responsiveness, encourage him/her to remain calm and to lie still.
  - Do not administer medication (unless the student requires medication for other conditions, e.g. insulin for a student with diabetes).
- Responsive student
  - Stop the activity immediately.
  - Initiate Emergency Action Plan.
  - When the student can be safely moved, remove him/her from the current activity or game.
  - Conduct an initial concussion assessment of the student. Following a blow to the head, face or neck, or a blow to the body that transmits a force to the head, a concussion should be suspected in the presence of any one or more of the common signs and symptoms of a concussion.

**INITIAL CONCUSSION ASSESSMENT - COMMON SIGNS AND SYMPTOMS** A sign is something that will be sensed by another person (e.g. parent/guardian, teacher, coach, supervisor, peer). The signs are as follows:

- Physical Signs include vomiting, slurred speech, slowed reaction time, poor coordination or balance, blank stare/glassy-eyed/dazed or vacant look, decreased playing ability, diminished responsiveness, lying motionless on the ground or slow to get up, amnesia, seizure or convulsion, or grabbing or clutching of head
- Cognitive Signs include difficulty concentrating, easily distracted, general confusion, cannot remember things that happened before and after the injury, does not know time, date, place, class, type of activity in which he/she was participating, or slowed reaction time (e.g., answering questions or following directions)
- Emotional/Behavioural Signs include strange or inappropriate emotions (e.g., laughing, crying, getting angry easily)
- Sleep Disturbance Signs include drowsiness or insomnia

A symptom is something the student will feel. The symptoms are as follows:

- Physical Symptoms include headache, pressure in head, neck pain, feeling off/not right, ringing in the ears, seeing double or blurry/loss of vision, seeing stars, flashing lights, pain at physical site of injury, nausea/stomach ache/pain, balance problems or dizziness, fatigue or feeling tired, or sensitivity to light or noise
- Cognitive Symptoms include difficulty concentrating or remembering, slowed down, fatigue or low energy, or dazed or in a fog
- Emotional/Behavioural Symptoms irritable, sad, more emotional than usual, nervous, anxious, or depressed
- Sleep Disturbance Symptoms include drowsy, sleeping more/less than usual, or difficulty falling asleep

*Please note* that signs and symptoms can appear immediately after the injury or may take hours or days to emerge. Signs and symptoms may be different for everyone. A student may be reluctant to report symptoms because of a fear that he/she will be removed from the activity, his/her status on a team or in a game could be jeopardized or academics could be impacted. It may be difficult for younger students (under the age of 10), students with special needs or students for whom English/French is not their first language to communicate how they are feeling. Signs for younger students (under the age of 10) may not be as obvious as in older students.

*If sign(s) are observed and/or symptom(s) are reported*, a concussion should be suspected. Do not allow the student to return to play in the activity, game or practice that day even if the student states that he/she is feeling better. Contact the student's parent/guardian (or emergency contact) to inform them of the incident, that they need to come and pick up the student; and that the student needs to be examined by a medical doctor or nurse practitioner as soon as possible that same day. Monitor and document any changes (i.e., physical, cognitive, emotional/behavioural) in the student. If any signs or symptoms worsen, call 911. Refer to the school's injury report form for documentation procedures. Do not administer medication (unless the student requires medication for other conditions – e.g., insulin for a student with diabetes). Stay with the student until her/his parent/guardian (or emergency contact) arrives.

The student must not leave the premises without parent/guardian (or emergency contact) supervision. The Parent/Guardian must be informed that the student needs to be examined by a medical doctor or nurse practitioner as soon as possible that day; and informed that they need to communicate to the school principal the results of the medical examination (i.e., the student does not have a diagnosed concussion or the student has a diagnosed concussion) prior to the student returning to school.

*If no concussion is diagnosed*, then the student may resume regular learning and physical activities. If a concussion is diagnosed, then the student must follow a medically supervised, individualized and gradual Return to Learn/Return to Physical Activity Plan.

*If signs are NOT observed and symptoms are NOT reported*, a concussion is not suspected and the student may return to physical activity. However the student's parent/guardian (or emergency contact) must be contacted and informed of the incident. The Parent/Guardian must be informed that signs and symptoms may not appear immediately and may take hours or days to emerge; the student should be monitored for 24-48 hours following the incident; and if any signs or symptoms emerge, the student needs to be examined by a medical doctor or nurse practitioner as soon as possible that same day.

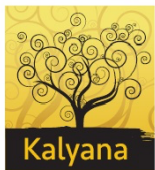
**RESPONSIBILITIES OF THE SCHOOL PRINCIPAL** Once a student has been identified as having a suspected concussion, the school principal must inform all school staff (e.g., classroom teachers, physical education teachers, intramural supervisors, coaches) and volunteers who work with the student of the suspected concussion; and indicate that the student shall not participate in any learning or physical activities until the parent/guardian communicates the results of the medical examination (i.e., the student does not have a diagnosed concussion or the student has a diagnosed concussion) to the school principal. Once the parent/guardian has informed the school principal of the results of the medical examination, the school principal must inform all school staff (e.g., classroom teachers, physical education teachers, intramural supervisors, coaches) and volunteers who work with the student of the diagnosis; and file written documentation of the results of the medical examination in the student's OSR.

**MANAGEMENT PROCEDURES FOR A DIAGNOSED CONCUSSION** A student with a diagnosed concussion needs to follow a medically scripted, supervised, individualized and gradual, Return to Learn/Return to Physical Activity Plan. While return to learn and return to physical activity processes are combined within this plan, a student with a diagnosed concussion must be symptom free prior to returning to regular learning activities and beginning a return to physical activity. The parent/guardian must provide the school principal with written documentation from a medical doctor or nurse practitioner that indicates the student is symptom free and able to return to full participation in physical activity in order for the student to return to physical activity.

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

**IMPLEMENTATION** This policy has been fully implemented as of January 30, 2015.





**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 Privacy Policy.

**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.

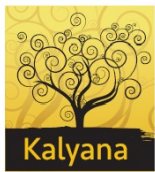
**PERMISSIONS** Personal information may be disclosed to parents or guardians and anyone for whom a parent or guardian has provided written permission to The Gregory School for Exceptional Learning and Kalyana Support Systems.

**PERSONNEL BOUND BY POLICY** 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 procedures of this policy, following the expiration or termination of an employment of service contract, indefinitely.
- Failure to comply with this policy will result first in a verbal warning, followed by progressive discipline measures.
- This policy will be distributed to both staff and clients through the Staff and Parent Handbooks.

*Policy Reviewed October 2023*



**PURPOSE** The purpose of this policy 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.

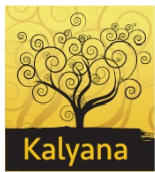
**CONTINUOUS ENFORCEMENT** This Conflicts of Interest Policy is to be upheld 12 months of the year, even if staff contracts are terminated over the summer months. The clients are still the organization's clients, therefore all of the concerns listed herein are still in effect.

**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)

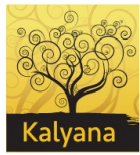


**PURPOSE** The purpose of this policy document is to outline the specific duties of those staff members who are assigned course supervision and the details of such duties.

**TASKS AND DETAILS** The following are the duties assigned and their details:

- Course planning
  - Create year-long plan of course scope and sequence including learning objectives to be included on IEPs.
  - Submit plan and learning objectives to the Principal prior to September 1st, when possible, and otherwise prior to September 30th.
- Material management
  - Advise Principal of materials required 4 weeks prior to allow for ordering and delivery.
  - If purchasing materials, retain receipts and deliver them to the principal in order to receive reimbursement.
  - Responsibilities for materials that require creation and preparation will be determined in conjunction with the program supervisor.
- Data management
  - Maintain data as required by the Principal.
  - Record daily score and test scores.
  - Ensure completion of Point Charts and Celeration charts, where applicable.
  - Celeration graphs indicating 3-5 consecutive descending data points or a plateau that is sustained for more than 3 days should be brought to the attention of the program supervisor.
  - Monitor program data to ensure consistent implementation of program procedures across instructors.
  - Make note of benchmarks achieved or data to celebrate. Bring these to the attention of the Principal for student recognition awards.
- Schedule time to meet with program supervisor
  - As required, schedule time with the program supervisor to review problem data or other issues with the program.
- Monitor data collection for IEP goals
  - Intermittently review IEP data collection guidelines developed by the program supervisor to ensure ongoing data collection for IEP goals.
- ISP updates
  - Responsibilities for ISP submissions will be determined in conjunction with the program supervisor.

*Policy Reviewed August 2022*



The following procedures have been developed with reference to directives from Ministry of Education, which takes its advice from the Office of the Chief Medical Officer of Health. They will be reviewed monthly, or upon the release of new or updated policies by the federal, provincial or municipal governments, including the Brant County Health Unit and Occupational Health and Safety.

### **Preventative Equipment and Procedures**

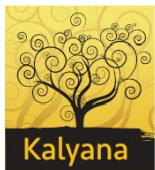
1. Staff and students may wear face masks. We will promote respectful, welcoming and inclusive environments for individuals who choose to wear, or not to wear, a mask while attending school.
2. Hand hygiene and respiratory etiquette will be integrated throughout the school day.

### **Screening and Attendance**

3. All staff, students and visitors will self-screen prior to attending in-person.
4. All staff and students who are experiencing symptoms consistent with COVID-19 as identified by the Ontario government's online COVID screening tool, must not attend school and should follow the guidance provided in the screening tool, which may include seeking appropriate medical attention as required, and/or getting tested for COVID-19.
5. If a child begins to show symptoms of COVID-19 while in care, the child will be isolated, parents will be notified for immediate pick up and follow the recommendations from the screening tool.
6. If a staff member begins to show symptoms of COVID-19 while at work, the recommendations from the screening tool are to be followed.
7. Our usual attendance precautions also continue to be in place. Students and staff are not to attend if they exhibit signs of fever, diarrhea, vomiting. Signs must be gone for 24 hours before returning to school or sessions, unless a longer isolation is required by the screening tool.
8. The school will notify Brant County Public Health if our absence rate increase above what we would typically experience, and if those absences are not related to non-COVID factors (e.g., holidays).

### **In-Home Session Procedures**

9. The client's family is required to send a message via Slack at least 1 hour prior to the session if their child OR others present in the home do not meet the screening requirements. If anyone in the home does not pass the screening, the session will be canceled.
10. If anyone in the home develops symptoms from the screening checklist at any time during the session, the session will be terminated.
11. The staff member(s) may wear a mask, and will wear a mask, if requested by the family.



**PURPOSE** The purpose of this policy 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:

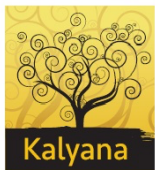
- Bluejeans, sweatshirts, sweatpants, exercise pants, short shorts, bib overalls, yoga pants or leggings worn without a dress.
- Shorts, skirts, and skirts that don't reach below the wearer's fingertips when standing.
- Tight skirts, sun dresses, beach dresses and spaghetti-strap dresses.
- Spaghetti 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.

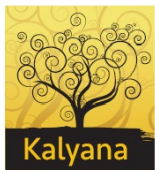
Reference: From The Medical Station ([www.themedicalstation.com/site/email-communication-policy](http://www.themedicalstation.com/site/email-communication-policy)).

**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.



**PURPOSE** Students and staff can be injured or become ill during the school day. Such events may require non-urgent, urgent, or emergency health care at school. The following document outlines policies and guidelines for all these situations, including emergency health care. All instructors are to be certified in Standard First Aid/CPR Level C for the 2016-2017 school year.

**PERSONNEL DESIGNATED AS SENIOR FIRST AIDERS** A complete list of certified staff is displayed in the Orchard (Kitchen). The following staff have been designated as Senior First Aiders:

- Angeline Savard
- Catherine McConnell
- Kate Harrison

**EMERGENCY LOCATION** In the event that a staff member or student needs emergency medical care, they will be transported to the Brantford General Hospital located at 200 Terrace Hill Street, Brantford, 519-751-5544.

**PROCEDURES AND STAFF** In the event of a health issue at school, whether urgent or non-urgent, the principal is to be notified and will be responsible for making decisions about required action. In the event that the principal is not on-site, another staff member certified in Standard First Aid/CPR Level C/AED shall be responsible for taking the required action.

If a student with special health needs is likely to require emergency transport to the hospital during the year, prospective communication with local emergency medical service professionals and an emergency transport plan should be completed.

Emergency health education for staff should include first aid, basic life support, and the recognition and treatment of anaphylaxis. Education should be on a voluntary basis with certificates provided. Periodic retraining in association with a current certificate of participation should be required to assure competence. All staff members should be educated about emergency response guidelines developed by the school administrator. Education about immobilization of the cervical spine, airway management, and rescue breathing should be a part of this training. Staff members should also be encouraged to obtain additional emergency response education whenever possible.

**MANUAL AND EMERGENCY KIT** A complete emergency medical kit should be kept in the secure location designated for medications. The kits should be readily available to educated staff volunteers. Kits should be checked in August, November, February, and May for restocking and/or expiration of contents. Auto-inject epinephrine should be available by individual prescription for students or staff members with a history of anaphylaxis. Staff members should be appropriately educated about the recognition and treatment of anaphylaxis in a person without a previous diagnosis of anaphylaxis, and auto-inject epinephrine should be a part of the emergency kit. An emergency care manual for first aid should be available to staff members.

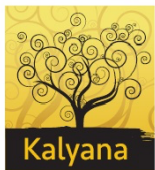
**NOTIFICATION AND DOCUMENTATION** Parents, legal guardians, or designated emergency contact persons must be informed as quickly as possible about injuries to their children at school. The description and disposition of significant illnesses or injuries (including the illnesses or injuries for which a student, staff member, or visitor is released from school to visit a physician or hospital) should be documented on Injury or Incident Report form. These forms are also used to review for patterns of injury, to inform parents of the circumstances and handling of the injury, to inform the child's usual source of health care or emergency medical service personnel, and as documentation for liability and insurance purposes.

**EMERGENCY PROCEDURE** In the event a student or adult collapses and is unresponsive, the following steps should be taken:

1. Using either the phone in the room or a cell phone, someone should call 911.
  - A. Confirm the location of the patient.
  - B. Confirm the situation with the 911 operator.
2. Send a teacher or capable student to inform the Principal/Office
  - A. The Principal should oversee the administration if First Aid/CPR is required.
  - B. Someone should be placed outside to direct EMS to the proper location.
3. Assess the victim: airway, breathing and circulation
4. Initiate CPR, if needed.
5. Upon arrival, EMS shall take charge of the situation.
  - A. Provide victim information: name, age, known medical problems and time of incident.
  - B. Provide information as to current condition.
6. Notify the student's parents/guardians and provide information as instructed by EMS

*\*If the patient has suffered any trauma or a fall, the patient should not be moved unless the scene is unsafe*

*\*Prior to EMS arrival, someone in the administration office should get the patient's emergency contact information from the file.*



**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.

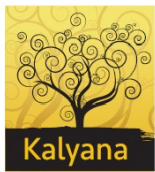
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**PURPOSE** The purpose of this policy document is to identify the practices that are intended to ensure the safety of staff and students of The Gregory School for Exceptional Learning and Kalyana Support Systems in the event of a fire or other emergency. In addition, this policy outlines items which must be implemented and documented in order to maintain fire protection systems and assist in the prevention of a fire on the premises.

**OBJECTIVES** The objectives of the Fire Safety Policy are:

- Fire Prevention - To prevent the occurrence of fire through the control of fire hazards and the proper maintenance of the build-in safety systems and facilities
- Occupant safety - To establish a systematic method for safe and orderly evacuation of the building in the case of fire or other emergency
- To establish procedures that will maximize the probability of controlling and extinguishing a fire in the safest and most efficient manner

**ROLES AND RESPONSIBILITIES** The roles and responsibilities of all involved parties of The Gregory School for Exceptional Learning and Kalyana Support Systems are as follows:

- The Principal
  - Be in complete charge of the approved Fire Safety Policy and the specific responsibilities of the personnel.
  - Designate and train sufficient assistants to act in this position, during any absence from the building.
  - Educate and train all building personnel and occupants in the use of the existing fire safety equipment and in the actions to be taken under the approved Fire Safety Policy. Actions include:
    - Fire drills shall be held three (3) times in each of the Fall and Spring terms.
    - Keep a record of all fire drills.
    - Designate someone to check washrooms.
    - Ensure all fire doors and service doors are closed.
- Teacher Designate
  - Perform the duties of the Principal in her absence.
  - Be familiar with the fire plan and duties of the Principal.
- Teachers
  - Familiarize students with prescribed exits from the school as well as alternate exits.
  - Ensure students are aware of procedures to be followed in case of an emergency.
  - Particular attention should be given to students who are away from their classroom (e.g. in the washroom, hallways, etc.).
  - Practice fire drill protocol with students.
  - Take attendance records when leaving classroom and let the Principal/Designate know whether or not all students are accounted for.
  - Close all doors when the classroom is vacant.

- Property Manager
  - Check, test and inspect fire safety equipment as per the Ontario Fire Code and note it in the log book.
  - Ensure exit doors are functioning and clear from hazards, snow, etc.
  - Maintain fire protection equipment in operating condition, at all times.
  - Have a working knowledge of the alarm system and how it is reset.
- Fire Safety Officer
  - Keep the emergency plans up to date with current names, phone numbers and addresses.
  - Be familiar with the fire plan and duties of the Principal.
  - Maintain fire drill records and inspection logs, as well as coordinate routine maintenance schedules.
  - Notify the Fire Department of shut down of any fire protection equipment for repairs.
- In general
  - Keep stairways, landings, hallways, passageways and exits (inside and outside) clear of any obstructions at all times.
  - Do not permit combustible materials to accumulate in quantities or locations which will constitute a fire hazard.
  - Promptly remove all combustible waste from all areas where waste is placed for disposal.
  - Keep access roadways, fire routes and fire pumper connections clear and accessible for Fire Department use.

**FIRE EXIT PLAN** A Fire Exit Plan will be maintained and will be posted on all floors of the facility. Copies will be kept in the school's "Policy" Manual and with the Fire Drill Records.

**FIRE DRILLS** Fire Drills will be conducted 6 times in the school year. Three drills should be done in the fall and three in the spring. The first drill of every school year is to be preceded by discussion and explanation of procedures to all students. Drills later in the school year are to be conducted without prior notice to staff and students.

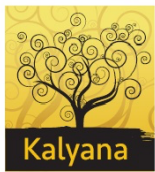
**FIRE DRILL RECORDS** A record of Fire Drill will be kept in the "Operations" manual. The date of the drill and any comments about the success of the evacuation procedures should be noted.

**ALARM SYSTEM** The alarm system was upgraded in August 2017 to provide for occupancies over 40 persons, as per specification approved by the County of Brant's Fire Inspection Department. Pull-stations are located in common areas, and smoke detectors provide automatic audible alarms that also signal the closest fire station (via Damar Security).

**IN THE EVENT OF A FIRE** The following steps will be taken in the event of a fire:

- Ensure the fire alarm has been activated.
- Supervise the evacuation of the occupants.
- Upon arrival of firefighters, inform the Fire Officer regarding conditions in the building.
- Provide access and vital information to firefighters (e.g. master keys for service rooms).
- Do not re-enter the building prior to consultation with the Senior Fire Official on scene.





**PURPOSE** The purpose of this policy document is to outline the check, test and inspect requirements of the Ontario Fire Code as they will be applied at The Gregory School for Exceptional Learning and Kalyana Support Systems.

#### DEFINITIONS

- Check means visual observation to ensure the device or system is in place and is not obviously damaged or obstructed
- Test means operation of device or system to ensure that it will perform in accordance with its intended operation or function
- Inspect means physical examination to determine that the device or system will apparently perform in accordance with its intended function

**RETENTION OF RECORDS** It is stated in the Fire Code that records of all tests and corrective measures are required to be retained for a period of two years after they are made and that they be made available upon request to the Chief Fire Official.

**PORTABLE FIRE EXTINGUISHERS** (reference should be made to NFPA 10-1990 for exact details)

Code No.	Maintenance Measures	Frequency
6.2.7.1	Maintain and <i>test</i> all portable extinguishers in conformance with NFPA 10	Annually
6.2.7.1	Hydrostatically <i>test</i> carbon dioxide and water type extinguishers	Every 5 years
6.2.7.1	Empty stored pressure type extinguishers and subject to maintenance	Every 6 years
6.2.7.1	Hydrostatically <i>test</i> dry chemical and vaporizing liquid type extinguishers	Every 12 years
6.2.7.2	<i>Inspect</i> all portable extinguishers	Monthly
6.2.7.6	Portable fire extinguishers shall be replaced or recharged after each use as indicated on the extinguishers nameplate	As required

#### MEANS OF EGRESS

Code No.	Maintenance Measures	Frequency
2.2.3.4	<i>Inspect</i> doors in fire separations	Monthly
2.2.3.5	<i>Check</i> doors in fire separations to ensure that they remain closed	As required
2.7.1.7	Maintain corridors free of obstructions	As required
2.7.3.1	Maintain exit signs to ensure they are clear and legible	As required
2.7.3.2	Maintain exit lights to ensure they are illuminated and in good repair	As required

## FIRE DEPARTMENT ACCESS

Code no.	Maintenance Measures	Frequency
2.5.1.3	Fire access routes (streets, yards and private roadways) shall be maintained so as to be immediately ready for use at all times by fire department vehicles - kept clear at all times	As required

## EMERGENCY LIGHTING - BATTERY PACK

Code no.	Maintenance Measures	Frequency
2.7.3.3	Pilot lights <i>checked</i> for operation	Monthly
2.7.3.3	<i>Inspect</i> terminal connections to ensure they are clean, free of corrosion and lubricated when necessary	Monthly
2.7.3.3	<i>Inspect</i> terminal clamps to ensure they are clean and tight, as per manufacturer's specifications	Monthly
2.7.3.3	<i>Inspect</i> to ensure electrolyte level and specific gravity are maintained as per the manufacturer's specifications (wet cell batteries only)	Monthly
2.7.3.3	<i>Inspect</i> the battery surface and ensure it is kept clean and dry	Monthly
2.7.3.3	<i>Test</i> emergency lighting units to ensure emergency lights will function upon failure of the primary power supply	Monthly
2.7.3.3	<i>Test</i> emergency lighting units to ensure unit will provide emergency lighting for a duration equal to the design criteria under simulated power failure conditions *	Annually
2.7.3.3	* After completion of the <i>test</i> , the charging conditions for voltage and current and the recovery period shall be tested to ensure that the charging system is in accordance with the manufacturer's specifications	Annually

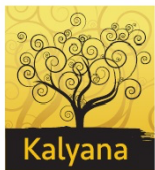
**EXIT SIGNS** The following are the sections of the Ontario Fire Code that relate to exit signs in our facility:

- Required exit signs shall be clearly visible and maintained in a clean and legible condition at all times, in accordance with Section 2.7.3.1
- Exit signs shall be internally or externally illuminated at all times while the building is occupied, in accordance with Section 2.7.3.2

## SMOKE DETECTORS / FIRE PANEL

Code no.	Maintenance Measures	Frequency
6.3.2.6	<i>Test</i> each manual pull station	Annually
6.3.2.2	<i>Test</i> alarm panel system	Monthly
6.3.2.2	<i>Test</i> sensitivity of smoke detectors	Annually
6.3.2.6	<i>Test</i> power supply	Weekly

*Policy Reviewed October 2024*



**FIRST AID** A first aid kit is located in the Orchard in the left hand upper cupboards. All teachers and instructors are to keep current Standard First Aid and CPR C/AED certification.

#### **PREVALENT MEDICAL CONDITIONS**

The Ministry of Education's Policy and Program Memorandum (PPM) 161 defines a prevalent medical condition as:

- Asthma
- Diabetes
- Epilepsy (we will include any history of seizures)
- Allergies at risk of anaphylaxis

Staff have the responsibility to:

- Know the plan of care
- Participate in training
- Disseminate information about the plan of care to other staff, students, parents, volunteers, where appropriate
- Follow strategies to reduce risk (e.g., ensure that the students avoid causative agents or activities)
- Support a student's medical needs and respond to medical incidents

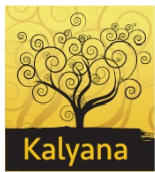
**FIRST AID FOR CONVULSIVE SEIZURES** The following procedure will occur in the event of a convulsive seizure to ensure the safety of the person experiencing it:

1. Stay calm! Do not restrain a person having a seizure.
2. Move sharp objects out of their way.
3. Do not put anything in their mouth.
4. Roll the person onto their side. Place something soft under their head.
5. Let the seizure take its course. Time it.
6. If the seizure lasts more than 5 minutes or repeats, call for medical attention.
7. Please refer, also, to the Emergency Health Plan Policy.

**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.

**NOTIFICATION** All efforts will be made to notify the parent immediately in the event of any injury to the child at school. Whenever a health measure is completed an Incident Report must be completed. Copies of are available in the courtyard. Refer, also, to the Injury and Incident Reporting Policy.

**RELATED POLICIES** For other health related information, please refer, also, to the Anaphylactic Allergies Policy, Concussion Policy, and those mentioned above.



#### **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**

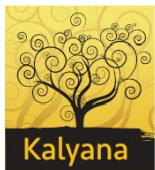
- Clinical Supervisor is a member of the College of Psychologists and Behaviour Analysts of Ontario, and is responsible for the oversight of client programs, and work together with the Case Manager or Team Supervisor to monitor and ensure client progress.
- Case Manager is responsible for overall client 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.
- Intake Coordinator fields calls from potential families and liaises with a Clinical Director to determine enrolment suitability and capacity.
- Schedulers prepare regular and weekly client/instructor schedules
- 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.

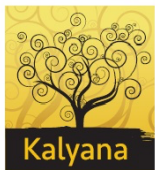
**PROCEDURES** GSEL/KSS employees are to arrive in advance of their scheduled shift. All employees should be prepared for the work day and in their client's designated location 15 minutes prior to their client's arrival.

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 bereavement leave.

#### **REGULATIONS**

Employment Standards Act, 2000 (ESA)

Employees in Ontario are entitled to up to two days of unpaid job-protected leave each calendar year due to the death of family member, 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.

Employees are entitled to time off used specifically for purposes of making funeral arrangements, attending a funeral or mourning the death of loved one.

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.

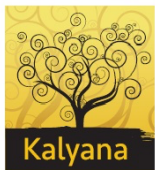
**PROCEDURES** When employees want to use their bereavement leave, they must notify their supervisor as soon as possible through GSEL/KSS's scheduling platform. The employee should specify when they will be off and, if possible, for how long.

In the event of a death in the family of an employee, job protected leave will be provided as follows:

- loss of spouse, son or daughter, mother, father - up to five (5) days
- loss of grandmother, grandfather, brother, sister, son-in-law, daughter-in-law, father-in-law or mother-in-law - up to three (3) days
- loss of aunt, uncle, cousin, niece or nephew - up to one (1) day

If long-distance travel is required to attend a service, the employee may take 2 additional unpaid days off. If more time is required, please notify the directors. Additional days will be deducted from eligible vacation time.

*Policy Reviewed April 2025*



**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:

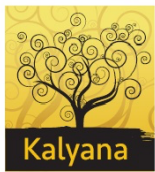
- exercise due care in the course of employment;
- wear or carry only items that are reasonable to be in their possession in the course of their duties;
- take reasonable precautions to secure personal items against damage;
- wear protective equipment as required;
- report personal loss to the Directors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

After one year of employment, GSEL/KSS will provide two (2) paid days and one (1) unpaid day to replace the ESA-mandated 3 unpaid days of sick leave.

After two years of employment, GSEL/KSS will provide paid leave for three (3) paid days to replace the ESA-mandated 3 unpaid days of sick leave.

At the end of a contract year, any unused portion of the two (2) or three (3) paid days, noted above, will be paid to the employee as a bonus.

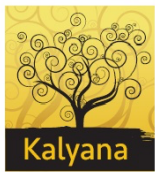
**SUBMISSION DEADLINES**

- Requests for leave of 1 week or more must be submitted a minimum of four (4) weeks in advance
- Requests for leave due to a sudden illness must be made as soon as possible, prior to 6:30 AM is preferred
- Requests for leave due to an appointment or for personal matters must be made as soon as possible

**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 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.



**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.

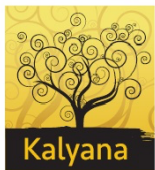
Employees may be eligible for paid travel time and/or mileage reimbursement in the following circumstances:

- 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.

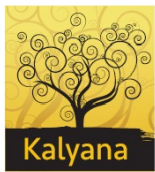
**VACATION SCHEDULING** Vacation scheduling is the responsibility of the Directors who will ensure that all employees are given their full vacation entitlement while taking into account the needs of GSEL/KSS. Employees should not make any vacation commitments until vacation scheduling has been approved.

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 or 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 or lower

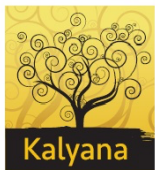
Other precautions that may be taken include:

- 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.

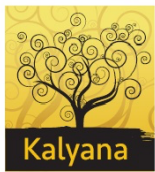
**REPORTING REQUIREMENTS** Personnel are required to submit a report for every event that involves injury and/or incident using the GSEL/KSS injury/incident report form. This includes events involving injury/incident to self, other adults or children. Copies of the form are available in the Courtyard (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 injury/incident and supervisor

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



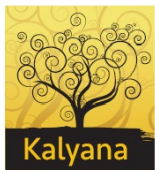


**PURPOSE** The Gregory School for Exceptional Learning and Kalyana Support Systems (GSEL/KSS) is entrusted with the care and education of its students. To protect the school community from the harmful effects of exposure to inappropriate information, it is essential that members of the school community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



**PURPOSE** The Principal and Executive Director of The Gregory School for Exceptional Learning and Kalyana Support Systems (GSEL/KSS) recognize the importance of the health and safety of all employees. Protection of workers from injury or occupational disease is a major continuing objective. GSEL/KSS will make every effort to provide a safe, healthy work environment. All employers, supervisors and workers must be dedicated to the continuing objective of reducing risk of injury.

**ACCOUNTABILITY** GSEL/KSS, as employer, is ultimately responsible for worker health and safety. As Principal and Executive Director (or owner/operator, chairperson, chief executive officer, etc.) of the organization, we give employees our personal commitment that we will comply with our duties under the Act, such as taking every reasonable precaution for the protection of workers in the workplace.

Supervisors will be held accountable for the health and safety of workers under their supervision. Supervisors are subject to various duties in the workplace, including the duty to ensure that furniture and equipment is safe and that workers work in compliance with established safe work practices and procedures.

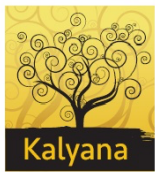
Every employee must protect his or her own health and safety by working in compliance with the law and with safe work practices and procedures established by the employer. Employees will receive information, training and competent supervision in their specific work tasks to protect their health and safety.

It is in the best interest of all parties to consider health and safety in every activity. Commitment to health and safety must form an integral part of this organization.

#### **RELATED POLICIES**

Alcohol, Drugs, and Related Products

Workplace Harassment and Violence



**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

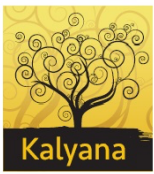
**LABEL PERSONAL ITEMS** Please ensure that your child's name is on outdoor clothing, footwear, lunch bags and personal items.

**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 recognizes that on rare occasions, a student may be unable to demonstrate appropriate self-control and may injure himself/herself or others or cause significant property damage. Thus, GSEL/KSS shall provide intervention measures, when deemed necessary, such as physical intervention. By this document, GSEL/KSS establishes physical intervention procedures to be employed by staff, on either an emergency or planned basis to ensure safety of people and property, and are not to be applied as punishment.

### DEFINITIONS

- Corporal punishment refers to the act of striking a student either with one's hand or with an object, such as a leather strap
- Physical intervention refers to a preventative procedure employed in exceptional circumstances where there is a realistic concern that a student may injure herself/himself or others or cause significant property damage. Physical intervention may involve the use of physical force that physically limits a student from performing an action.
  - Emergency physical intervention refers to actions taken in a crisis situation in which a student poses an immediate risk to himself/herself or others. This type of physical intervention precludes prior consultation with parent(s)/guardian(s).
  - Planned physical intervention refers to the use of manual physical intervention as the final step in a sequence of actions following the onset of an acting-out behaviour. This type of physical intervention is part of a Physical Intervention Action Plan for a student based on his/her needs and previous history of acting-out behaviour. This type of intervention requires prior consultation with parent(s)/guardians(s).

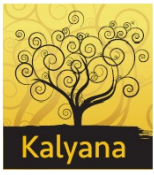
**REGULATIONS** We are governed by the following regulations:

- Constitution Act 1982 - Charter of Rights and Freedoms
  - Everyone has the right not to be subjected to any cruel and unusual punishment.
- Canadian Criminal Code, R.S.C., 1995 - Correction of Child by Force: Section 43
  - Every schoolteacher, parent or person standing in the place of a parent is justified in using force by way of correction toward a pupil or child, as the case may be, who is under his care, if the force does not exceed what is reasonable under the circumstances.
- Education Act, R.S.O., 1998
  - Sec.264(1) - It is the duty of a teacher and a temporary teacher to maintain, under the direction of the Principal, proper order and discipline in the teacher's classroom and while on duty in the school and on the school group.
  - Sec.265 - It is the duty of the Principal of a school, in addition to the Principal's duties as a teacher to maintain proper order and discipline in the school.
- Regulation 298
  - 11 (1) - The principal of a school, subject to the authority of the appropriate supervisory officer is in charge of,
    - (a) the instruction and the discipline of pupils in the school; and
    - (b) the organization and management of the school.

- 20. - In addition to the duties assigned to the teacher under the Act and by the school, a teacher shall,
  - (h) cooperate with the principal and other teachers to establish and maintain consistent disciplinary practices in the school.
- 23 (1) - A pupil shall,
  - (b) exercise self-discipline;
  - (c) accept such discipline as would be exercised by a kind, firm and judicious parent;
  - (e) be courteous to fellow pupils and obedient and courteous to teachers;
  - (h) show respect for school property.
- Child and Family Services Act, R.S.O., 1990 - Corporal Punishment: 101
  - No service provider or foster parent shall inflict corporal punishment on a child or permit corporal punishment to be inflicted on a child in the course of the provision of a service to the child.

**PROCEDURES** The following steps will be followed when physical intervention is necessary:

1. All staff members shall resolve disruptive or out-of-control behaviour by using the least intrusive means possible, unless circumstances dictate emergency or planned physical intervention.
2. Staff shall document all incidents involving emergency physical intervention on the Incident Report form. A copy of this report is submitted to the Principal. The original is filed in the student's Documentation File (blue) and/or the Ontario Student Record (O.S.R.)
3. Parents/guardians shall be informed of each emergency physical intervention incident.
4. Emergency physical intervention precludes prior consultation with the parent/guardian.
5. When a child's needs or history of acting-out behaviours requires it, a Behaviour Support Plan shall be completed by GSEL/KSS, in consultation with the parents. The use of intervention procedures should be logged and a Incident Report should be completed if procedures other than those specified in the Plan are used. An outside school or centre will be notified if our staff are working with a child in the other school or centre.
6. A Physical Intervention Action Plan, if required, shall be filed in the student's Documentation File (blue) and/or the Ontario Student Record (O.S.R) and shall be an integral part of the student's Individual Education Plan (I.E.P)
7. If physical intervention is occurring with a student on a frequent basis, it is incumbent on the team of staff working with the child and on the Principal or delegate to develop a proactive behaviour plan geared toward reducing or eliminating the need for physical intervention.
8. A Physical Intervention Action Plan is reviewed each term.
9. Any injury to staff and/or students during a physical intervention shall be recorded according to our organization's policies on the Physical Intervention Incident Report and reported to the Principal and the parent/guardian.
10. The Principal shall follow established procedures to obtain medical assistance and report injuries.
11. Only safe, effective physical intervention strategies approved by the School may be used with students. Corporal punishment is *not* permitted at GSEL/KSS, with any student under any circumstances.
12. Training in Safety-Care will be provided for staff members who will be involved in planned physical intervention.



**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.

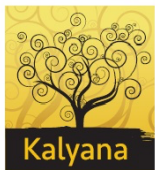
**PHYSICAL PROMPTING** Physical prompting may be used for the following reasons:

- 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 [Physical Intervention Policy](#).



**PURPOSE** The purpose of this policy document is to articulate the practices that are intended to protect the privacy of individuals who deal with The Gregory School for Exceptional Learning and Kalyana Support Systems (GSEL/KSS).

**ACCOUNTABILITY** GSEL/KSS is committed to protecting the privacy of the personal information of its students, employees, consultants and all other individuals as they are related to GSEL/KSS. GSEL/KSS values the trust of those we deal with, and recognizes that maintaining this trust requires that we be accountable in how we treat the information that is shared with us.

**DEFINITION** Personal information is any information that can be used to distinguish and identify an individual. Personal information includes information that relates to an individual's personal characteristics (e.g. gender, age, home address, telephone number, and family status), health (e.g. health/developmental history, health conditions/diagnosis, health services received) or activities and views (e.g. culture, community involvement). Personal information is to be contrasted with business information (e.g. individual's business address and telephone number), which is not protected by privacy legislation. Anyone from who we collect such information should expect that it will be carefully protected and that any use of or other dealing with this information is subject to consent.

**IMPLIED CONSENT** Consent to the collection of personal information is implied by the provision of such information to GSEL/KSS staff members.

**INFORMED CONSENT** Informed consent is obtained in instances where personal information will be displayed or distributed within and/or outside the GSEL/KSS community.

**WITHDRAWAL OF CONSENT** Consent can be withdrawn at any time for any reason with written notice provided to GSEL/KSS within a reasonable time frame.

**COLLECTION OF INFORMATION** The collection of personal information shall be limited to that which is necessary for purposes identified by GSEL/KSS. This information helps us to provide appropriate instruction with respect to the educational needs and development of students on an individual basis. For example, GSEL/KSS collects information as follows:

- Clients
  - Name
  - Birthdate
  - Gender
  - Address, telephone/home/cell/fax/business number
  - Developmental history
  - Health/diagnosis
  - Educational history
  - Educational progress

- Employees
  - Address, telephone/cell/fax number
  - Birthdate
  - Social Insurance Number
  - Education, employment and training history
  - Performance reviews

GSEL/KSS will remove any personal information as requested. All information is collected by fair and lawful means.

**DISSEMINATION OF INFORMATION COLLECTED AND RETAINED** GSEL/KSS discloses information for purposes as they relate to students, parents of students, employees and governing bodies. The most common examples are as follows:

- Information gathered by GSEL/KSS may be disclosed to staff members, consultants and government organizations (e.g. The Community Care Access Centre) in order to serve educational needs of the students.
- Statistical information (excluding names) may be provided to the Ministry of Education and/or Statistics Canada as required by law.
- To invoice clients for tuition and services rendered.

**PROTECTION OF INFORMATION** We understand the importance of protecting personal information. For that reason, we have taken the following steps:

- Complete student records are kept in a locked filing cabinet in the school's main office.
- Electronic records are maintained on a secure internal server, with internet back up provisions.
- Student names, parent names, phone numbers and pertinent medical information are kept in a convenient location to be accessed by staff in the event that emergency contact is necessary, except where mentioned above. Confidentiality will be kept by all GSEL/KSS staff.

**RETENTION OF INFORMATION** Personal information shall be retained only as long as necessary for the fulfillment of the purposes for which it was obtained, or as required by law. We destroy paper files containing personal information by shredding. We destroy electronic information by deleting it.

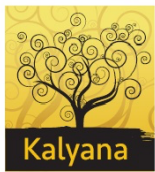
**ACCESS TO INFORMATION** An individual shall be informed of the existence, use and disclosure of personal information and shall be given access to that information. An individual shall be able to challenge the accuracy of the information and have it amended as appropriate.

**CONTACT INFORMATION** Questions, concerns or complaints relating to our privacy policy or practices should be addressed to our Privacy Information Officer, Angeline Savard. She will attempt to answer any questions or concerns you might have. You can contact her at:

- Kalyana Support Systems 1249 Colborne Street West RR#4 Brantford ON N3T 0M6  
519.449.2983 / 519.449.1650

If you wish to make a formal complaint about our privacy practices, you may make it, in writing, to our Privacy Information Officer. She will acknowledge receipt of your complaint; ensure that it is investigated promptly and that you are provided with a formal decision and reasons in writing.





**PURPOSE** The Gregory School for Exceptional Learning and Kalyana Support Systems (GSEL/KSS) is committed to providing a safe and secure learning environment for students and staff. School and site security protocols are an essential part of this commitment to safety.

**SECURITY PROTOCOLS** GSEL/KSS has three security protocols included in the lockdown plan, as outlined below:

- Hold and secure should be used when it is desirable to secure the facility due to an ongoing situation outside and not related to the facility (e.g. a robbery in the vicinity). In this situation, the facility continues to function normally, with the exterior doors being locked until such a time as the situation near the facility is resolved.
- Shelter in Place should be used for an environmental or weather related situation, where it is necessary to keep all occupants within the facility, to protect them from an external situation (e.g. chemical spills, blackouts, explosions or extreme weather conditions).
- Lockdown should only be used when there is a major incident or threat of violence directed at GSEL/KSS. During a lockdown, students and staff are directed to a secure room, with doors locked, windows/curtains closed and all sight lines into rooms blocked.

In the event that the security alarm has been activated when the first staff arrives to open the building, the person should NOT enter the building, and should return to their vehicle. Once safely in their vehicle, the person should phone the alarm company and wait for their assessment, and ascertain that the police have been dispatched if signs of intrusion were seen.

**HOLD AND SECURE (EXTERIOR DOORS LOCKED)** This procedure will be initiated when it is desirable to secure GSEL/KSS due to an ongoing situation outside and not related to the facility (e.g. a crime being committed in the area). In this situation, GSEL/KSS continues to function normally, with the exterior doors being locked until such time as the situation near the school is resolved. The following steps will occur if *hold and secure* is put in place:

- The local authority (Police, Fire Department, etc.) will notify GSEL/KSS.
- GSEL/KSS will take direction from the local authority regarding student and building security in the facility during *hold and secure*.
- Remain calm.
- If GSEL/KSS is required to *hold and secure*, staff will be notified at the commencement of the procedure.
- Bring all students and staff who may be outside the building inside as quickly as possible.
- Secure the building: deploy staff to lock all exterior doors and windows.
- Track and monitor student attendance.
- Respond as soon as possible to parent requests for information.
- Staff and students unable to enter the building once a hold and secure has been initiated will:
  - Move as far away from the building as quickly as possible.
  - Proceed to evacuation site designated by the local authority.
  - If necessary, the Principal will deploy staff to the evacuation site designated by the local authority.

- Retain students at the evacuation site.
- Track and monitor student attendance.
- Release students to parents/guardians from the evacuation site only on the direction of the local authority to ensure that all student releases are documented.
- The local authority will assign personnel to the evacuation site to communicate information to staff, students and families.
- Under no circumstances should anyone be allowed to enter or leave the building during a *hold and secure*, including parents. Children cannot be released to parents after the *hold and secure* has been initiated without the permission of the local authority.
- All media inquiries regarding the incident and the situation inside GSEL/KSS will be managed by the local authority and/or designated staff as determined by consultation between the local authority and GSEL/KSS.
- Wait for the “all clear” call or notice from the local authority before unlocking doors.

**SHELTER IN PLACE** Shelter in Place is used for an environmental or weather related situation where it is necessary to keep all occupants within the facility, to protect them from an external situation (e.g. chemical spills, blackouts, explosions or extreme weather conditions. (May be recommended by Police, Fire Dept., Emergency Response Services.) The following steps will occur if *shelter in place* is initiated:

- People enter and remain in the building with the doors and windows closed
- Fans, including heating and air conditioning units, should be turned off to prevent outside air from entering the building if it is determined that the air intake could pose a health or safety risk for occupants.
- Normal operations may continue within the building.

**LOCKDOWN** (EXTERIOR DOORS OPEN, INTERIOR DOORS TO BE LOCKED) When it is suspected that an intruder(s) has entered GSEL/KSS and poses a threat to the life and/or welfare of students or staff (has a gun, knife, explosives, etc.) or a violent intent:

- Stay calm.
- Do not confront the subject.
- Notify the Principal immediately.
- If safe to do so, provide the following details:
  - Location and number of suspects
  - Suspect(s) moving around or stationary
  - Identity, if known
  - Description of physical appearance (clothing, build, etc.)
  - Description of weapons
  - Possible motive or threats made
  - Location of any known injuries or casualties
- *The Principal will immediately announce the lockdown system using the pre-arranged code: CODE RED, CODE RED, CODE RED, INITIATE LOCKDOWN*
- **CODE RED** is in effect until cancelled by the Principal or designate on the direction of the local authority.
- Call 911:
  - Describe the situation (all known details)
  - Describe any injuries

- Stay on the line, provide information as requested
- Explain safe approach (routes/entrances) for Police
- Advise Police where they will be met
- Begin to document times, events

If inside the school, the following steps will occur:

- Direct students to lockdown areas (Field, Spruce, Walnut, Pine hallway) or to an evacuation site designated by the local authority.
- Quickly check and clear halls, stairwells and open areas.
- Direct staff to safe areas once students are located safely.
- Lock classroom and other safe interior doors.
- Respond as directed by the local authority.
- Locate in safe areas out of line of sight of doors, windows, take up a prone position on the floor and/or take cover behind book shelves, etc., as directed.
- Teachers will take attendance, determine if anyone is missing, and who else is present (students from other classes, etc.).
- Maintain calm and reasonable order.
- Bring master keys to safe area.
- Once doors are locked, do not admit anyone to the classroom or secure area.
- Wait for further instructions and stay in the safe area until the “all clear” has been sent.

If outside the school, the following steps will occur:

- Do not enter the building.
- Move as far away from the building as quickly as possible.
- Proceed to evacuation site designated by the local authority.
- If necessary, the Principal will deploy GSEL/KSS staff to the site designated by the local authority.
- Have students remain at the evacuation site.
- Track and monitor student attendance.
- Students may be released to parents/guardians from evacuation site only on direction of the local authority.
- All student releases are to be documented.
- The local authority will assign personnel to the evacuation site to communicate information to staff, students and families.

The following are GSEL/KSS Administrative responsibilities:

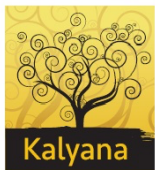
- The Principal or designate will meet the local authority on arrival, describe the situation and provide a floor plan of the facility.
- School Administration and staff will cooperate with and take direction from the local authority throughout the situation.
- Respond to parent requests for information.
- Under no circumstances should anyone be allowed to leave the building once the *lockdown* has been implemented.

The local authority will:

- Be in charge of the incident scene.
- Handle media relations regarding the incident and police response.
- Notify GSEL/KSS Administration with the "all clear."

**FIRE ALARM ACTIVATION DURING A LOCKDOWN, HOLD AND SECURE OR SHELTER IN PLACE** If a **Code Red** has been initiated, and the school is in *lockdown*, disregard the fire alarm if it is safe to do so. Staff and students must always be aware of the potential for other emergencies such as fire. Should this occur, staff and students must be prepared to react and possibly evacuate a locked down area for their own safety.

**LOCKDOWN DRILLS** GSEL/KSS will review *lockdown* procedures with staff each school year. If requested by police, GSEL/KSS will participate in a *lockdown* drill. GSEL/KSS will seek direction from the police about the need to notify others (i.e. school neighbours, media, etc.). When drills are scheduled, parents will be given advance notification of the date and time of the drill. Procedures for a *lockdown* must be reviewed with students before a drill is held. Following a drill, a debriefing will be held by the Principal with staff.

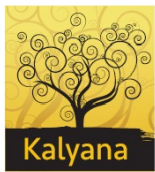


**PURPOSE** The Gregory School for Exceptional Learning and Kalyana Support Systems (GSEL/KSS) is entrusted with the care and safety of its students. To ensure the safety of the student, and to provide them with the orderly environment so necessary to encourage learning, it is essential that GSEL/KSS staff be able to react swiftly and effectively when faced with a situation that could unreasonably disrupt the school environment or jeopardize the safety of the students.

**REASONS FOR A SEARCH** A search of a student by GSEL/KSS staff will be instituted only in circumstances where staff has reasonable grounds to believe that a school rule has been or is being violated, and that evidence of the violation will be found in the location of, or on the person of, the student searched. No legal warrant is required. These reasonable grounds may be based on information considered to be credible that is received from one or more students or from the observation of staff. For example, a report from a student that another student is carrying a weapon would be such a reason.

**PROCEDURES FOR A SEARCH** The search conducted by GSEL/KSS staff will be reasonable and appropriate in light of the circumstance presented and the nature of the suspected breach of school rules. Every search will be conducted in as sensitive a manner as possible and take into account the age and sex of the student. Whenever possible, the search will be conducted by a same-sex staff member and witnessed by another staff member.

**WHAT MAY BE SEARCHED** A student's person or property (e.g. locker, desk, knapsack) may be searched when given reasonable grounds as described above.



**INTRODUCTION** The Gregory School for Exceptional Learning/Kalyana Support Systems is committed to consistent and transparent processes that allow for meaningful consideration of requests for service animals to accompany students in school. The purpose of this policy is to outline our procedures for handling requests for service animals to accompany students in school.

**CONTEXT** The Ministry of Education's Policy/Program Memorandum 163 states that schools are "expected to allow a student to be accompanied by a service animal in school when doing so would be an appropriate accommodation to support the student's learning needs." The Gregory School for Exceptional Learning and Kalyana Support Systems is a school community where individuals are accommodated under the Ontario Human Rights Code.

### DEFINITIONS AND REGULATIONS

A **Service Animal** is any animal that provides support to a person with a disability. Dogs are the most common species; however, other species may provide service to individuals with special needs. Functions performed by a service animal include, but are not limited to, sensory, medical, therapeutic, and emotional support services (PPM 163). In the context of this policy, the supports a service animal provides would relate to assisting the student in meaningfully accessing education.

The **Ontarians with Disabilities Act, 2005** (the "AODA") provides guidance related to the use of service animals by individuals with a disability.

The **Ontario Human Rights Code**, schools have a duty to accommodate the needs of students with disabilities up to the point of undue hardship. These accommodation may include allowing services animals.

### PROCESS

1. A parent who wishes to make a request for a student to be accompanied by a service animal in school, should make the request in writing to the Principal. The request must be accompanied by documentation stating the need for the request, including recommendation from a health care provider or other professional that supports the need for a service animal.
2. Upon receipt of a request, a meeting will be set with the parent(s) and relevant school personnel (e.g., principal, case manager). The parent may invite other professionals to attend the meeting.
3. Following the information gathering process (i.e., written request and meeting), the principal, in conjunction with relevant school staff will consider make a case-by-case determination, consider the following:
  1. documentation on how the service animal supports the student's learning needs and/or disability-related needs, including documentation from the student's medical professionals
  2. the disability-related needs and learning needs of the student
  3. other accommodations available
  4. the rights of other students and the needs of the school community
  5. any training or certification of the service animal
  6. any special considerations that may arise as a result of the necessary care of the animal
  7. consideration of privacy rights of the student seeking to bring a service animal to school

4. If the service animal request is approved, a plan will be created that includes:
  1. recording the decision and details in the student's Individual Service Plan
  2. collecting documentation required for the animal (e.g., annual vaccinations records)
  3. the type of support the service animal will provide to the student
  4. list of handlers of the service animals while at the school
  5. details on the training of staff who will have direct contact with the service animal
  6. the plan for the care of the animal while at school (including supporting the safety and biological needs of the animal)
  7. timeline for the implementation of the plan
  8. strategies for sharing information with members of the broader school community who may be impacted by the decisions (e.g., other students, parents, educators), while identifying how the student's privacy will be considered.
5. If the service animal request is denied, a written response will be provided to the family in a timely manner.

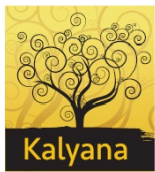
**TRAINING** This policy will be part of the regular and ongoing annual staff and volunteer training.

**IMPLEMENTATION** This policy will be fully implemented on June 1, 2021.

**REVIEW** This policy will be reviewed annually by the administration.

### **References**

Ontario Ministry of Education (2019). Policy/Program Memorandum No. 163: School Board Policies on Service Animals.



**PURPOSE** The purpose of this policy is to establish guidelines for disciplinary actions so that a consistent course of action is applied in order to ensure the safety and security of the entire school community.

**STATEMENT OF BELIEF** The Gregory School for Exceptional Learning and Kalyana Support Systems believe that a positive school climate and a safe learning and teaching environment are essential if students are to succeed in school.

### REGULATIONS

Ministry of Education Policy/Program Memorandum No. 145

Education Act, as Amended by the Education Amendment Act (Progressive and School Safety), 2007

### DEFINITIONS

- A positive school climate is one in which everyone - parents, students, staff and community members - feels welcome and respected.
- A suspension is an act of discipline in which a student is removed from school for a period of one to twenty school days. A suspended student cannot take part in school activities or events. A student suspended for longer than 5 days will be provided with an academic program to continue his or her learning while on suspension.
- An expulsion is an act of discipline in which a student is removed from the school permanently. The student will not be permitted to re-enrol in the school's programme

**ACTIVITIES LEADING TO POSSIBLE SUSPENSION** Section 306 of the Education Act states that a Principal *shall consider whether to suspend* a student if he or she believes that the student has engaged in any of the following activities while at school, at a school-related activity or in other circumstances where engaging in the activity will have an impact on the school climate:

- Uttering a threat to inflict bodily harm on another person
- Possessing alcohol or illegal drugs
- Being under the influence of alcohol
- Swearing at a teacher or at another person in authority
- Committing an act of vandalism that causes extensive damage to school property
- Bullying
- Any other activity that is an activity for which a principal may suspend a student under a policy of GSEL/KISS

In considering whether to suspend a student for engaging in an activity described above, a principal shall take in account any mitigating or other factors prescribed by the regulations.

**ACTIVITIES LEADING TO SUSPENSION AND POSSIBLE EXPULSION** Section 310 of the Education Act states that a Principal *shall suspend* a student and may expel a student if he or she believes that the student has engaged in any of the following activities while at school, at a school-related activity or in other circumstances where engaging in the activity will have an impact on the school climate:



- Possessing a weapon, including possessing a firearm
- Using a weapon to cause or to threaten bodily harm to another person
- Committing physical assault on another person that causes bodily harm requiring treatment by a medical practitioner
- Committing sexual assault
- Trafficking in weapons or in illegal drugs
- Committing robbery
- Giving alcohol to a minor
- Any other activity that, under a policy of GSEL/KSS, is an activity for which a Principal must suspend a student and, therefore, in accordance with this Part, conduct an investigation to determine whether to decide that the student be expelled.

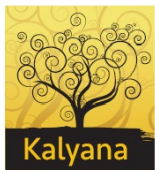
**MITIGATING FACTORS** For cases of possible suspension and/or expulsion, the following mitigating factors shall be taken into account:

- The student does not have the ability to control his or her behaviour.
- The student does not have the ability to understand the foreseeable consequences of his or her behaviour.
- The student's continuing presence in the school does not create an unacceptable risk to the safety of any person.

For cases of possible suspension and/or expulsion, the following other factors shall be taken into account if they would mitigate the seriousness of the activity for which the student may be or is being suspended or expelled:

- The student's history.
- Whether a progressive discipline approach has been used with the student.
- Whether the activity for which the student may be or is being suspended or expelled was related to any harassment of the student because of his or her race, ethnic origin, religion, disability, gender or sexual orientation or to any other harassment.
- How the suspension or expulsion would affect the student's ongoing education.
- The age of the student.
- In the case of a student for whom an individual education plan has been developed.
- Whether the behaviour was a manifestation of a disability identified in the student's individual education plan.
- Whether appropriate individualized 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.

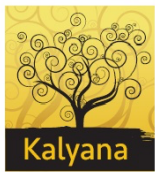
**DISSEMINATION** The policy will be disseminated as part of the school's Staff and Parent Handbooks.



**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.



**PURPOSE** This document sets out the policy of The Gregory School for Exceptional Learning and Kalyana Support Systems (GSEL/KSS), regarding workplace violence and harassment, as required by the Occupational Health and Safety Act. This policy is not intended to, nor could it ever possibly, address every potential incident of workplace violence or harassment at GSEL/KSS. This policy is also not intended to address any other workplace health and safety issues, nor any other legal obligations required by any other federal, provincial, regional, or municipal legislation or regulation. This policy is effective and enforceable as of June 15th, 2010, and thereafter, until reviewed or repealed.

**COMMITMENT** GSEL/KSS is committed to providing a school environment in which all individuals are treated with respect and with dignity, and in which all reasonable preventative and reactive actions are taken to prevent workplace violence and harassment, which will not be tolerated by any employer, supervisor or worker. Employers, supervisors and workers at GSEL/KSS are dedicated to preventing workplace violence and harassment, are all expected to uphold this policy, and will all be held accountable for so doing.

**DISTRIBUTION** This written policy will be provided to all new workers at the commencement of or before their first day of work, and will also be continuously and conspicuously (for all employers, supervisors and workers) posted at GSEL/KSS.

**BACKGROUND** Workers may face violence and harassment in any workplace and from any person in that workplace. There is a continuum of unwanted behaviours that can occur in a workplace, escalating from offensive remarks to physical violence. It is important for GSEL/KSS to address any unwanted behaviours early, in order to minimize the potential for any workplace harassment to escalate into workplace violence. The harassing or violent person may be someone the worker comes into contact with, such as a student, a parent, or another family member. The harassing or violent person may also be a co-worker, supervisor, or employer. Or, that person may be someone with no formal connection to the workplace, such as a stranger or a domestic/intimate partner, who brings violence or harassment into the workplace.

**WORKPLACE HARASSMENT** The Occupational Health and Safety Act defines workplace harassment as engaging in a course of vexatious comment or conduct against a worker, in a workplace. This behaviour should be known or ought reasonably to be known to be unwelcome. These comments or conduct typically occur more than once. They could occur over a relatively short period of time (for example, even during the course of just one day) or over a longer period of time (weeks, months or even years). Workplace harassment can involve unwelcome words or actions that are known or should be known to be offensive, embarrassing, humiliating or demeaning to a worker or to a group of workers. Such harassment can also include behaviour that intimidates, isolates or even discriminates against a worker.

Reasonable work actions or conduct by a supervisor or employer are not workplace harassment, even if there are sometimes unpleasant consequences. Examples include reasonable changes in work assignments or scheduling, work assessments and evaluations, workplace inspections, implementation of dress codes, and reasonable disciplinary actions.

Differences of opinion or minor disagreements between co-workers are also not workplace harassment.

**WORKPLACE VIOLENCE** The Occupational Health and Safety Act defines workplace violence as the exercise of (or the attempt to exercise) physical force against a worker, in a workplace, that causes or could cause physical injury to the worker. It also includes a statement or behaviour that a worker could reasonably interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker.

Workplace violence also includes situations where two non-workers, such as students, are fighting and a worker could be injured when he or she intervenes. The non-workers need not have intended their violence to injure another.

A person who has a personal relationship with a worker (a spouse or former spouse, current or former intimate partner, or a family member) may physically harm, or attempt or threaten to physically harm, that worker at work. In such a situation, this domestic violence is also considered to be workplace violence. Domestic violence may also pose a threat to co-workers. An employer, supervisor, or worker may become aware of domestic violence when an incident takes place at the workplace, when a concern is reported, or upon discovery of threatening e-mails or telephone calls received at work, or unwelcome domestic visits to the workplace. Even if a worker does not want any action taken, GSEL/KSS will act to prevent such domestic violence, and to protect employers, supervisors, and co-workers.

### **CONTROLLING, REPORTING AND INVESTIGATING WORKPLACE VIOLENCE AND HARASSMENT**

To prevent workplace violence and harassment, GSEL/KSS has controlled access to the school property and buildings, has advised employers, supervisors and workers of the prescribed school lockdown policy, and has provided appropriate levels of training in first aid, cardio-pulmonary resuscitation, crisis prevention, student behaviour history, and the management of aggressive or violent behaviours. Employers, supervisors and staff unaware or unclear of any of these school controls should immediately advise the Principal, by dated and written notice.

Staff receive training and updates on patterns of student behaviour, behaviour support plans, and management strategies. Written plans are accessible to staff at all times. Staff may obtain updated information via the internal messaging system (Slack), or by speaking with the case manager, clinical supervisors, or principal.

Staff will contain a student engaged in aggressive or destructive behaviour, keeping them to their instructional area and away from common areas. If a student engaged in aggressive or destructive behaviour is in a common area, staff will call for assistance and provide direction to other staff or students re: avoiding the area.

Depending upon the levels of urgency and seriousness, immediate assistance should be summoned, in escalating order, from nearby staff, from office supervisors and staff, or from police or emergency medical responders (911).

To communicate the need for assistance, workers can yell to nearby staff, use the internal messaging system (Slack), or phone the case manager or principal's cell phone directly.

All incidents of workplace violence and harassment must be immediately (as soon as practicable, immediately after the occurrence of the incident) reported in writing to the Principal or, in the absence of the Principal, to the Principal's designate.

Upon receipt of a dated and written report, the Principal or the Principal's designate will investigate, determine and resolve any complaint. The original report and all subsequent documentation will be retained by GSEL/KSS as workplace violence and harassment records.

Where an incident of workplace violence occurs, the Principal or the Principal's designate may notify police or emergency medical responders. If a workplace violence incident results in a person being killed or critically injured, then GSEL/KSS will immediately notify the Ontario Ministry of Labour. Such notice is not required for incidents of workplace harassment.

**WORK REFUSALS** The Occupational Health and Safety Act does not require GSEL/KSS to assess the risk of workplace harassment.

GSEL/KSS must assess the risk of workplace violence that may arise from the physical aspects of the school, from the type (including interactions with students and families) of work, and from the conditions (including regular or periodic staff isolation) of work. GSEL/KSS must take into account the circumstances of the workplace and the circumstances common to similar workplaces, and must continue to develop measures and procedures to control identified risks that are likely to expose a worker to physical injury. These assessment results are already identified herein, and will be reviewed at least annually.

The risks of workplace violence should be re-assessed as often as is necessary to protect workers from workplace violence. For example, a reassessment should be undertaken if the workplace moves or the existing workplace is renovated or reconfigured, if there are significant changes in school student composition, or if a violent incident indicates a risk related to the nature of the workplace, type of work, or conditions of work that was not identified either initially or during an earlier assessment.

In any event, this policy will always be annually reviewed during our pre-school staff training at GSEL/KSS. This annual review will focus on the effectiveness of the measures and procedures in this policy, in order to ensure effective use and continuing protection. Employers, supervisors and workers will also be concurrently consulted annually on the efficacy of the reporting, investigation, determination and resolution policies.