

**Date of Issue** August 2023  
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**Subject** **REPORTING AND INVESTIGATING HEALTH AND SAFETY INCIDENTS**

**References** [Policy 3045 – Workplace Violence](#)  
[Policy 3140 – Health and Safety](#)  
[Policy 3035 – Workplace Conflict Resolution](#)  
[Policy 4240 – Safe Inclusive and Accepting Schools](#)  
[APM A1440 – Physical Containment](#)  
[APM A1450 – Management of Personal Information - Student](#)  
[APM A7100 – Reporting Violent Incidents](#)  
[APM A7635 – Student Discipline Procedures](#)  
[Municipal Freedom of Information and Protection of Privacy Act](#)  
[Occupational Health and Safety Act](#)  
[The Workplace Safety and Insurance Act](#)

**Contact** Corporate Risk – Health and Safety

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## 1. Purpose

- 1.1 This Administrative Procedures Memorandum (APM) provides guidance to employees of the Simcoe County District School Board (SCDSB) for reporting and investigating workplace health and safety incidents. It establishes procedures to identify, assess, and control potential and actual hazards in the workplace including but not limited to those related to workplace violence. It also serves to establish procedures to report and respond to health and safety incidents in support of the SCDSB's commitment to promoting a safe and healthy working and learning environment for all workers.
- 1.2 Personal information of employees collected through this procedure will be used to determine appropriate board safety responses and shall not be disclosed for any other purpose, except in compliance with the *Municipal Freedom of Information and Protection of Privacy Act* (MFIPPA) and appropriate board authorization. No information that personally identifies a student (e.g., name, initials, grade, etc.) shall be recorded on the reports, other than in the 'Student Demographics' section.

## 2. General

- 2.1 The board recognizes the need to provide a healthy and safe working environment for all its employees. Reporting health and safety work-related incidents, including those that result in illness or injury, is governed in Ontario by two pieces of legislation: [The Workplace Safety and Insurance Act](#), 1997, and the [Occupational Health and Safety Act \(OHSA\)](#) (R.S.O. 1990).

- 2.2 Under section 25(2)(h) of the OHS Act, employers are responsible to take every precaution reasonable in the circumstances for the protection of the worker and shall advise workers of the existence of any potential or actual danger to the health and safety of the worker of which the employer is aware.
- 2.3 Every employee has the responsibility to report to their administrator/supervisor any health and safety issue that endangers their health and safety, including workplace violence.
- 2.4 The Workplace Safety and Insurance Board (WSIB) is the Ontario organization that is mandated by the [Workplace Safety and Insurance Act](#) to independently administer the workplace injury/illness claims of Ontario workers. It provides adjudication of employees' claims for benefits covering health care and loss of earnings.
- 2.5 In a Workplace Violent Incident (WVI) involving an employee and student where police notification is required, pursuant to [APM A7100 – Reporting Violent Incidents](#), the incident shall be reported as per this procedure, as well as APM – A7100 Reporting Violent Incidents. The term violent incident, as referenced in APM A7100, is defined as the occurrence of any one of the following:
- 2.5.1 possession of weapons, including possessing a firearm;
  - 2.5.2 physical assault causing bodily harm requiring medical attention;
  - 2.5.3 sexual assault;
  - 2.5.4 using a weapon to cause or to threaten bodily harm to another person;
  - 2.5.5 robbery;
  - 2.5.6 extortion; and,
  - 2.5.7 any hate/or bias-motivated occurrences.
- 2.6 In a WVI involving an employee and a student, where a student is restrained, the incident shall be reported as per this procedure, in addition to completion of the Physical Containment Incident Report ([FORM A1440 - 1a](#)). See [APM A1440 – Physical Containment](#) for further information.

### 3. Definitions

- 3.1 Critical injury – an injury, as defined by the OHS Act, that:
- 3.1.1 places life in jeopardy;
  - 3.1.2 produces unconsciousness;
  - 3.1.3 results in substantial loss of blood;
  - 3.1.4 involves the fracture of an arm or leg, but not a finger or toe;
  - 3.1.5 involves the amputation of a leg, arm, hand, or foot, but not a finger or toe;
  - 3.1.6 consists of burns to a major portion of the body; or,
  - 3.1.7 causes the loss of sight in an eye.

The Ministry of Labour interpretation of this definition is as follows:

- 3.1.8 the fracture of the foot or ankle may constitute a critical injury;
- 3.1.9 the fracture of a single toe does not constitute a critical injury; however, the fracture of more than one toe may constitute a critical injury;
- 3.1.10 the fracture of the hand or the wrist may constitute a critical injury; and,
- 3.1.11 the fracture of a single finger does not constitute a critical injury; however, the fracture of more than one finger may constitute a critical injury.

- 3.2 First aid – the emergency care or treatment of a minor injury on-site, administered under legislated first aid requirements, with the aim of preventing an injury or illness from becoming worse.
- 3.3 Health care – the employee has required professional treatment given by or under the supervision of a physician at a medical facility or in transit to such a facility. This can also include treatment by a dentist, physiotherapist, chiropractor, or registered nurse (extended class). The employee is able to return to their next scheduled work shift.
- 3.4 Individual education plan (IEP) - a written plan describing the special education program and/or services required by a student, based on an assessment of their strengths, and needs that affect their ability to learn and demonstrate learning.
- 3.5 Lost time – the employee has required health care and has been unable to report for the start of the next scheduled work shift.
- 3.6 Personal protective equipment (PPE) - specialized protective clothing or equipment that is worn to protect a person from injury or infection.
- 3.7 Safety plan-notification of worker risk (SP-NoWR) - a plan to notify workers of a risk of workplace violence from a student with a history of, or credible threat of, violent behaviour which includes identification of the student, behavioural risks, safety strategies when working with the student, and how to summon immediate assistance.
- 3.8 Site supervisor - a person who has charge of a workplace or authority over a worker.
- 3.9 Strengths and needs committee (SNC) - a school-based team that provides strategies and assistance for supporting individual students. A record of the meeting is documented using the SNC form.
- 3.10 Worker - a person who performs work or supplies services for monetary compensation, including students on unpaid work experience programs (e.g., teacher candidates, secondary school co-op students on placement in school boards, early childhood educator candidates).
- 3.11 Workplace - office, school, or other worksite where the individual is customarily employed, including all other places which result from employment responsibilities or employment relationships (e.g., board or committee meetings, work-related social functions, work assignments outside the office/school, field trips, work-related conferences or training sessions, and work-related travel).
- 3.12 Workplace Health and Safety Incident Report Form – an incident reporting and investigation tool (administered by Parklane), which provides employees with an electronic reporting system for all health and safety incidents, including near miss, first, aid, medical, and lost time as well safe schools and workplace violence incidents under the OHSA.

- 3.13 Workplace violence incident (WVI) - an incident of workplace violence towards an employee that meets the definition of workplace violence under the OHSA. A WVI could involve a student, parent/guardian, co-worker, member of the public, or visitor. The OHSA defines workplace violence as:
- 3.13.1 the exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker;
  - 3.13.2 an attempt to exercise physical force against a worker, in a workplace, that could cause physical injury to a worker; and,
  - 3.13.3 a statement or behaviour that is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in the workplace, that could cause physical injury to the worker.
- 3.14 Workplace violence prevention staff survey - a survey conducted every year, to give employees an anonymous and voluntary opportunity to identify risks within the workplace to their administrator/site supervisor.
- 3.15 Workplace violence risk assessment (WVRA) - an annual review of the risks associated with a specific school location or workplace completed by the site supervisor/administrator.

#### **4. WSIB benefits coverage**

All employees of the board, whether temporary or permanent, are eligible for benefits when they are deemed by WSIB to have suffered an injury/illness arising out of and in the course of their official duties.

#### **5. WSIB legislated requirements**

- 5.1 To comply with legislation, when an employee is injured at work or develops an occupational illness, the board as the employer is required to:
- 5.1.1 keep a record of all circumstances of injuries that require first aid, health care or result in lost time from work;
  - 5.1.2 complete and submit Employer's Report of Injury/Disease (WSIB Form 7) to WSIB within three business days of becoming aware of a work-related injury/illness that requires health care or lost time from work;
  - 5.1.3 offer early and safe return to work programs to injured/ill employees using functional abilities information or WSIB standard medical precautions;
  - 5.1.4 pay wages to the employee for the full shift on the day of injury without loss of sick credit; and,
  - 5.1.5 pay transportation costs by such means as ambulance or taxi for initial medical treatment on the day of injury.
- 5.2 Legislation also requires WSIB to assess financial penalties to employers who fail to submit injury/illness reports to them within three business days of becoming aware of an injury/illness that requires health care or lost time from work.
- 5.2.1 The period of three business days begins on the day the employee informs a person in a position of authority (principal, vice-principal, manager, or supervisor) at the work location about the injury/illness.

5.2.1.1 It is the responsibility of the person to whom the injury is reported to ensure that the [Workplace Health and Safety Incident Report Form](#) is completed and submitted by the worker within one working day of the health and safety incident. If the worker is unable to complete the Workplace Health and Safety Incident Report Form, the person to whom the injury was reported must complete and submit the Workplace Health and Safety Incident Report Form with as much information as available.

## 6. Responsibilities

- 6.1. Workers will be responsible for:
  - 6.1.1 following safe work procedures established by the employer including but not limited to those relevant to the prevention of workplace violence;
  - 6.1.2 reporting all workplace health and safety incidents, including those involving violence, as soon as possible to their administrator/supervisor. This initial reporting can be done verbally. The incident must be formally reported using the Workplace Health and Safety Incident Report Form within one business day;
  - 6.1.3 reviewing SP-NoWRs on a regular basis and adhering strictly to their requirements;
  - 6.1.4 communicating any concerns that they or another worker may be exposed to a health and safety hazard to their administrator/supervisor using the health and safety concerns reporting process, including the use of the [Health and Safety Concern Reporting Tool](#);
  - 6.1.5 working collaboratively with their administrator/supervisor, Human Resources Services, and Corporate Risk – Health and Safety on development and implementation of a specific safety plan if it is determined that one is needed to ensure the health and safety of the employee(s) related to workplace violence;
  - 6.1.6 using or wearing PPE as identified by the employer outlined in the SP-NoWR or through alternative means (e.g., verbal/written direction);
  - 6.1.7 not responding to workplace violence incidents or engaging in behaviour management systems (BMS) response unless they are familiar with the direction outlined in the SP-NoWR and possess the necessary training, skills, and abilities to safely respond. If they are unable to safely respond, they must immediately contact the administrator/supervisor for support; and,
  - 6.1.8 observing rules of confidentiality and not disclosing or in any way using the information contained in a SP-NoWR outside the functions of their work.
- 6.2. Occasional and itinerant workers will be responsible for:
  - 6.2.1 following the worker responsibilities as listed in section 6.1;
  - 6.2.2 ensuring they have signed in at the school/site office and acknowledged they have received and reviewed the SCDSB occasional staff handbook, including a thorough review of the SP-NoWR SCDSB for students they will be supporting;

- 6.2.3 notifying the administrator/supervisor if they are unable to meet the requirements outlined in the SP-NoWR prior to the start of their workday. This could include, but is not limited to, current BMS certification and/or access to PPE that fits; and,
  - 6.2.4 receiving and returning (at the end of the daily assignment) the SCDSB occasional staff handbook.
- 6.3 Administrators/supervisors will be responsible for:
- 6.3.1 encouraging workers to report all health and safety incidents, including those involving workplace violence, using the Workplace Health and Safety Incident Report Form;
  - 6.3.2 completing an investigation for all health and safety incidents including those involving workplace violence;
  - 6.3.3 completing the investigation and submitting the Workplace Health and Safety Incident Report Form within two business days following their awareness of the incident to ensure the incident can be reported to WSIB as required under the *Workplace Safety and Insurance Act*;
  - 6.3.4 ensuring the outcomes of the investigation are thoroughly documented using the Workplace Health and Safety Incident Report Form
  - 6.3.5 taking every reasonable precaution and responding to potential or actual hazards or risks, as required, through the prevention strategies/measures and implementation of controls;
  - 6.3.6 implementing temporary/short-term controls while conducting the investigation to ensure worker safety, where possible;
  - 6.3.7 working collaboratively with the affected employee(s), Human Resources Services, and Corporate Risk – Health and Safety to create a specific safety plan if the outcome of the investigation involving a third-party indicates that a specific safety plan is needed to ensure the health and safety of the employee(s) related to workplace violence. The Violence Threat Report Form (FORM 1) will be used to document the specific safety plan. The administrator/supervisor will ensure that a copy of the Violence Threat Report Form is maintained in a secure confidential file and that upon closure of the file, this completed form is submitted to Human Resources Services.
  - 6.3.8 addressing lack of adherence to health and safety directives, including the SP-NoWR, and/or the OHSA through appropriate progressive disciplinary process;
  - 6.3.9 ensuring that work orders related to mitigating health and safety risks include language that outlines the risk and rationale as to why they should be expedited;
  - 6.3.10 ensuring that the Workplace Health and Safety Incident Report Form report is completed and submitted by the worker within one working day for incidents that result in health care or lost time to ensure the incident can be reported to WSIB as required under the *Workplace Safety and Insurance Act*. Repeated late submissions may be reviewed with the appropriate superintendent and any financial penalties assessed to the board by the WSIB may be passed on to the school or department budget;
  - 6.3.11 completing the Workplace Health and Safety Incident Report Form using the known details of the incident if an employee is unable to complete the form due to the severity of the injury or ongoing absence from the workplace;

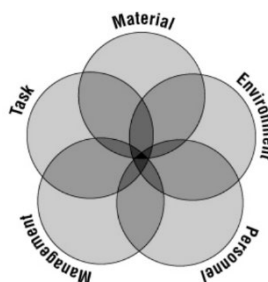


- 6.3.12 ensuring required communication steps take place in the event of a critical injury or a fatality as outlined in 7.2;
  - 6.3.13 daily monitoring of the universal sign-in log to ensure that occasional and itinerant staff possess the necessary knowledge and training to fulfill the functions of their assignment (e.g., PPE, current BMS training etc.);
  - 6.3.14 monitoring prevention strategies/measures on an ongoing basis to ensure the potential hazard/risk has been sufficiently mitigated;
  - 6.3.15 completing the WVRA annual review for their location (board owned and leased facilities) and responding to identified issues;
  - 6.3.16 creating and approving SP-NoWRs in PowerSchool in consultation with SCDSB resources such as the Special Education and Corporate Risk – Health and Safety departments as appropriate, while ensuring that all identified potential risks of violence have an associated mitigation strategy;
  - 6.3.17 ensuring workers are aware of any potential or actual workplace hazards, including those related to workplace violence;
  - 6.3.18 ensuring all workers have received information and instruction in procedures/safety measures that minimize the risks specific to their assignment through monthly staff meetings and stand-up meetings, and review of the SP-NoWR by occasional staff;
  - 6.3.19 ensuring the information provided to workers does not include any personal information that is more than reasonably necessary to protect the worker from physical injury and in keeping with required and appropriate legislation;
  - 6.3.20 ensuring that information related to students who may pose a risk to employee safety is made available to the affected employee(s) prior to the student's admission to the school. If this is not possible, ensuring an appropriate interim plan for worker safety is enacted;
  - 6.3.21 ensuring that safety-related information communicated to workers is appropriately documented, including the content of the communication and who it was communicated to;
  - 6.3.22 ensuring workers adhere to the SP-NoWR as written;
  - 6.3.23 ensuring that affected worker(s) receive PPE, appropriate training and instruction on its use, and ensure it is being worn as per the SP-NoWR;
  - 6.3.24 ensuring that affected worker(s) have the required training (e.g., BMS) to safely facilitate their assigned role as per the SP-NoWR. If this is not possible, an alternate plan for worker safety must be enacted; and,
  - 6.3.25 updating information in SCDSB-issued safety plan binder(s) and occasional staff handbook binder(s) as required.
- 6.4 Corporate Risk - Health and Safety will be responsible for:
- 6.4.1 providing advice and assistance to administrators/supervisors in identifying and addressing health and safety hazards and risk factors related to workplace violence;
  - 6.4.2 supporting and providing guidance related to the health and safety incident investigation process;
  - 6.4.3 consulting with the Ministry of Labour in the event of a critical injury;
  - 6.4.4 coordinating training related to health and safety incident investigation and prevention of workplace violence;
  - 6.4.5 coordinating the WVRA annual review and staff surveys, including providing templates and tools for completing and monitoring;

- 6.4.6 providing information to the Joint Health and Safety Committee (JHSC), as required, to allow them to fulfill their responsibilities under OHSA; and,
  - 6.4.7 providing workplace violence summary data reports to the superintendents of education, the Superintendent of Special Education and the JHSC in September, November, January, April, and June of each year.
- 6.5 The Special Education department will be responsible for:
- 6.5.1 providing support to schools (e.g., special education resource teachers, administrators) in addressing risk factors related to workplace violence for students where the risk factors are directly related to their special education needs;
  - 6.5.2 supporting schools with the transition process for students with special education needs, including helping with the completion of the transition checklist and SP-NoWR;
  - 6.5.3 coordinating training on relevant equipment related to prevention of workplace violence (e.g., BMS, personal protective equipment, etc.); and,
  - 6.5.4 providing support in developing and implementing individualized programming specific to the student's special education needs (e.g., IEP) to reduce the risk of workplace violence.
- 6.6 The Facility Services department will be responsible for:
- 6.6.1 prioritizing work orders related to workplace violence.
- 6.7 The JHSC will be responsible for:
- 6.7.1 receiving reports of workplace violence incidents;
  - 6.7.2 receiving the results of the WVRA annual review;
  - 6.7.3 making recommendations to the board with respect to health and safety hazards and workplace violence prevention; and,
  - 6.7.4 ensuring confidentiality is maintained at all times.

## 7. Procedures

- 7.1. Health and safety incident investigation procedures
- 7.1.1 The administrator/supervisor is responsible for investigating the incident, collecting all relevant materials, examining all equipment, tools and analyzing the evidence to identify underlying root causes. They will ensure that any immediate risks to the health and safety of the employee(s) are mitigated.
  - 7.1.2 Please refer to the [Canadian Centre for Occupational Health and Safety](#), which provides a simple incident causation model that can guide the investigation process by identifying potential incident causes related to Task, Material, Environment, Personnel, and Management.





- 7.1.3 Administrators/supervisors shall include the following points in the Workplace Health and Safety Incident Report Form:
  - 7.1.3.1 date and hour of incident and reporting;
  - 7.1.3.2 reasons for any delay in reporting;
  - 7.1.3.3 cause of the injury – describing the incident;
  - 7.1.3.4 what the worker was doing at the time of injury/incident, and what level of physical effort was involved;
  - 7.1.3.5 description of the equipment or materials involved;
  - 7.1.3.6 part(s) of the body involved;
  - 7.1.3.7 whether pain was a gradual or sudden onset;
  - 7.1.3.8 any conditions that may have contributed to the incident;
  - 7.1.3.9 what steps have been or will be taken to prevent the recurrence of the incident (e.g., training, repair of equipment/conditions, etc.) and the status of the action;
  - 7.1.3.10 any pre-existing conditions which may have contributed to the incident;
  - 7.1.3.11 the names of departments, services, and persons to which the recommendations have been sent;
  - 7.1.3.12 photo evidence (e.g., photos of the incident scene including any applicable hazards that are present);
  - 7.1.3.13 incident location (using [drawings or maps](#) if needed); and,
  - 7.1.3.14 witness statements
- 7.1.4 In incidents involving workplace violence, the administrator/supervisor shall also include the following points in the Workplace Health and Safety Incident Report Form:
  - 7.1.4.1 the individual(s)' potential motivation to engage in violent behaviour;
  - 7.1.4.2 any triggering behaviour of others that may have resulted in the violent behaviour;
  - 7.1.4.3 if the individual(s) experienced a triggering event prior to entering the school; and,
  - 7.1.4.4 any lack of adherence to the SP-NoWR.
- 7.1.5 Incidents involving violence causing bodily injury requiring health care must be reported to police. In other cases, the administrator/supervisor, in consultation with the affected worker(s), will exercise their discretion whether to contact police based on the nature of the incident and extenuating circumstances (see [APM 7100 – Reporting Violent Incidents](#)).
- 7.2 Critical injury reporting procedures
  - 7.2.1 In the event of a critical injury, external reporting is required in addition to internal reporting. All external reporting procedures will be handled by the Corporate Risk - Health and Safety department. Such investigations will be carried out following strict protocols as prescribed by occupational health and safety legislation.
  - 7.2.2 Should an employee be fatally or critically injured from any cause at the workplace:

- 7.2.2.1 The administrator/supervisor shall:
    - 7.2.2.1.1 ensure that appropriate emergency medical treatment for the individual is received. Call 911 to obtain transportation to medical care, as appropriate. If an ambulance is not appropriate, arrange transportation with the worker's emergency contact or a taxi service. A worker seeking emergency health care should be strongly encouraged not to operate a motor vehicle;
    - 7.2.2.1.2 ensure that the scene of the incident is not interfered with, except for the purpose of saving life, relieving human suffering, or the prevention of unnecessary damage to equipment or other property, until permission is given by the Ministry of Labour;
    - 7.2.2.1.3 notify Corporate Risk – Health and Safety immediately by telephone; and,
    - 7.2.2.1.4 notify the respective superintendent by telephone.
  - 7.2.2.2 The Corporate Risk – Health and Safety department shall:
    - 7.2.2.2.1 immediately notify the union and health and safety certified worker representative of the critical injury;
    - 7.2.2.2.2 support the completion of a joint incident investigation by the administrator/supervisor and certified health and safety representative;
    - 7.2.2.2.3 report the critical injury to the Ministry of Labour (1-877-202-0008) immediately, providing the details of the incident; and,
    - 7.2.2.2.4 submit the Notice of Occurrence written report to the Ministry of Labour within 48 hours. There may be a requirement to include a copy of the completed Incident Investigation Report.
  - 7.2.2.3 The superintendent shall:
    - 7.2.2.3.1 complete an Internal Communication Protocol (ICP).
  - 7.2.3 No official statement shall be released except under the authority of the office of the Director.
  - 7.2.4 Failure to report critical injuries or potentially critical injuries may result in charges under the OHSA.
- 7.4 SP-NoWR procedures
- 7.4.1 Creation and communication of SP-NoWR
    - 7.4.1.1 Every effort will be made to develop and implement a SP-NoWR prior to exposing workers to a student who has the potential to present a risk of violent behaviour.
    - 7.4.1.2 Where an actual or potential risk of workplace violence by a student is identified, administration will oversee the development of a SP-NoWR.
    - 7.4.1.3 The SP-NoWR is created in PowerSchool and can be developed by an administrator or a special education resource teacher (SERT) with final authorization required by the administrator/supervisor.

- 7.4.1.4 The SP-NoWR is created in consultation with affected worker(s) and, where appropriate, with staff from the Special Education and/or Corporate Risk – Health and Safety departments.
- 7.4.1.5 The SP-NoWR must provide sufficient information to ensure that workers can recognize or identify the student, including name, photo, behaviours presenting risk, preventative measures to mitigate all identified risks, safety strategies, and summoning immediate assistance instructions.
- 7.4.1.6 The SP-NoWR must include language that outlines how to ensure worker safety during transitions (e.g., emergency drills/events, between learning spaces, beginning and end of the school day) and at alternate locations (e.g., field trips, transportation), as applicable.
- 7.4.1.7 The SP-NoWR must be shared with all permanent and occasional school staff, and itinerant or other visiting staff (e.g., teacher candidates, co-operative education students in school placements) that may, in the course of their work, come into regular and direct contact with the student for whom the plan was developed.
- 7.4.1.8 Communication of the SP-NoWR will be done through the SCDSB-issued safety plan office binder, occasional staff handbook, regular staff meetings, stand-up meetings (when required), PowerSchool notifications, and administration emails notifying staff of a change or new SP-NoWR.
- 7.4.2 Review, modifications, and retirements of SP-NoWRs
  - 7.4.2.1 Administrators are required to review, monitor, and/or modify the SP-NoWR at least annually to ensure the plan is an accurate reflection of the risk posed by the student. The SP-NoWR must be modified in response to all incidents of workplace violence to mitigate risk to employee safety. If no modification is appropriate, the administrator will ensure their investigation notes in the Workplace Health and Safety Incident Report Form include the rationale for this decision.
  - 7.4.2.2 Administrators can check the status of their school's current safety plan information in PowerSchool by running the SP-NoWR List report.
  - 7.4.2.3 Administrators can create a student list of all currently enrolled students who have an active SP-NoWR recorded in PowerSchool by running the Safety Plan – Student List report.
  - 7.4.2.4 An SNC must be held to assess and document incidents of behaviours identified in the SP-NoWR during that reporting period as evidence of student behaviour to justify the current SP-NoWR.
  - 7.4.2.5 SNC updates must be communicated/shared with parent(s)/guardian(s).
  - 7.4.2.6 A reduction of student behaviour posing risk of workplace violence must be demonstrated for at least two full reporting periods or 10 months before modification of the SP-NoWR can be made. Changes in student behaviour resulting in modification to the SP-NoWR must be documented in the SNC note and added to the student's Ontario Student Record (OSR).

- 7.4.2.7 If the student behaviour is posing risk of workplace violence escalates (e.g., change in behaviour that could increase potential for a workplace violence incident or risk of injury to self or others) modifications to the SP-NoWR must be made immediately and communicated to affected worker(s).
- 7.4.2.8 An SP-NoWR should not be retired until there has been two final reporting periods or 10 months with no evidence of student behaviour posing a risk to worker safety (e.g., suspensions, workplace violence incidents data collection). Changes in student behaviour resulting in the retirement of the SP-NoWR must be documented in the SNC note and added to the student's OSR.
- 7.4.3 Transitioning students with an SP-NoWR between SCDSB schools
  - 7.4.3.1 Risk of a worker being potentially injured while working with a student with an SP-NoWR is greatest during a transition to a new school and staff and/or when the student engages with occasional staff.
  - 7.4.3.2 The administrator of a school receiving a student with a current SP-NoWR will begin and manage the transition process through PowerSchool.
  - 7.4.3.3 Administrators are required to follow and complete the online transition checklist to ensure risk is mitigated. The process is initiated by creating a new transition checklist in Powerschool and requesting that the sending school grant access to view the SP-NoWR.
  - 7.4.3.4 The administrator of the receiving school should consult with the previous school's administrator for the purpose of registration and to gather relevant information such as behavioural information (e.g., current violent behaviour, behavioural history of the last two years, site and target of violence), and academic information (e.g., Identification, Placement and Review Committee (IPRC), IEP, reports from professional staff, student strengths and interests) using the SP-NoWR Student Transition Checklist.
  - 7.4.3.5 Consult with the SERT, special education consultants, and Corporate Risk – Health and Safety, as appropriate, to develop SP-NoWRs.
  - 7.4.3.6 Defer entry, if required, until an SP-NoWR can be developed to ensure worker safety and student success.
  - 7.4.3.7 Meet with parent(s)/guardian(s) to share SP-NoWR.
  - 7.4.3.8 The SP-NoWR content cannot be downgraded during this transition process until there is evidence of reduced risk for at minimum a period of 10 months or two consecutive final reporting periods.
  - 7.4.3.9 The SP-NoWR content can be upgraded to reflect escalated student behaviour at any time.

- 7.4.4 Pre-registration process for students new to the SCDSB who require an SP-NoWR
  - 7.4.4.1 Prior to enrolling a new student, perform a 'district search' in PowerSchool to determine if the student already exists in PowerSchool. To search for a pre-registered student, ensure you have enabled 'include inactive students' in the PowerSchool preferences.
  - 7.4.4.2 If the student exists in PowerSchool do not enroll them as a new student; contact the school where the previous enrollment record exists and request the student be transferred to your school.
  - 7.4.4.3 If the student does not exist in PowerSchool, plan to pre-register the student as a new student once the registration process is completed with a planned future enrollment date (i.e., date the student is expected to start school).
  - 7.4.4.4 After the student has been pre-registered in the school, begin the online transition checklist process in PowerSchool to create the SP-NoWR.
  - 7.4.4.5 Meet with parent(s)/guardian(s) for the purpose of registration and to gather relevant information such as behavioural information (e.g., current violent behaviour, behavioural history of the last two years, site and target of violence), and academic information (IPRC, IEP, reports from professional staff, student strengths and interests).
  - 7.4.4.6 Consult with the previous school's administrator for the purpose of registration and to gather relevant information such as behavioural information (e.g., current violent behaviour, behavioral history of the last two years, site and target of violence), and academic information (e.g., IPRC, IEP, reports from professional staff, student strengths and interests). Following the completion of the SP-NoWR Student Registration Checklist, defer entry while awaiting receipt of the SP-NoWR from the student's previous school.
  - 7.4.4.7 Consult with the SERT and special education consultants to develop the SP-NoWR.
  
- 7.5 WVRA procedures
  - 7.5.1 The purpose of the WVRA is:
    - 7.5.1.1 to identify potential or actual hazards in the workplace associated with a risk of workplace violence;
    - 7.5.1.2 to identify and implement controls required at the worksite to address or mitigate the hazard; and,
  - 7.5.2 A WVRA will be conducted under the direction of the administrator/supervisor in the following circumstances:
    - 7.5.2.1 annually, including voluntary and anonymous input from staff using the Staff Survey template provided by Corporate Risk - Health and Safety issued; and,
    - 7.5.2.2 whenever circumstances change at a site or in a department (e.g., major renovation, addition of a new county class, transition of a high needs student with an SP-NoWR) which are likely to have an impact on the potential or actual hazards associated with workplace violence at that workplace.

- 7.5.3 A WVRA is to be conducted using the online WVRA document and following the process established by Corporate Risk - Health and Safety. The online WVRA tool is provided annually by Corporate Risk – Health and Safety to all applicable administrators/supervisors.
- 7.5.4 The WVRA should consider the following:
  - 7.5.4.1 circumstances specific to the workplace;
  - 7.5.4.2 any other prescribed elements under the OHSA;
  - 7.5.4.3 location of the workplace (e.g., urban, rural, unique neighbourhood features);
  - 7.5.4.4 physical layout and design features of the building and the workspace;
  - 7.5.4.5 requirements for working in the community, (e.g., teaching in sites other than schools, outreach activities);
  - 7.5.4.6 parking lot design;
  - 7.5.4.7 access to the workplace (i.e., entry points);
  - 7.5.4.8 working with potentially unstable or volatile clients/students, (e.g., students with severe emotional/behavioural needs);
  - 7.5.4.9 requirement for handling cash (e.g., fundraising activities, registration fees for adult programs);
  - 7.5.4.10 working alone or in small numbers, (e.g., working late, meeting parents/guardians after school hours); and,
  - 7.5.4.11 the presence of specific programs in a school community, in addition to regular programs (e.g., night school programs, programs for students with special needs, suspension/expulsion programs, community use programs).
- 7.5.5 The annual or most current WVRA completed by the administrator/site supervisor will be:
  - 7.5.5.1 sent electronically to Corporate Risk - Health and Safety and the superintendent of education;
  - 7.5.5.2 posted on the Health and Safety bulletin board at the site; and,
  - 7.5.5.3 shared with the JHSC by Corporate Risk – Health and Safety, as required by the OHSA.

## **8. Prevention strategies/measures**

- 8.1 Workplace violence prevention strategies  
Where the administrator/supervisor has reason to believe there is a risk of recurrence of a workplace violence incident, the following should be considered for purposes of protecting workers from injury:
  - 8.1.1 develop a SP-NoWR as soon as reasonably possible where one does not already exist;
  - 8.1.2 review and revise the existing SP-NoWR, as appropriate;
  - 8.1.3 document rationale for not creating/revising a SP-NoWR following a workplace violence incident;
  - 8.1.4 make arrangements for the student aggressor to be removed temporarily if required, until adequate measures are put in place to protect workers from a recurrence;
  - 8.1.5 update the WVRA, if applicable;
  - 8.1.6 if necessary, and at the discretion of the administrator/supervisor, in consultation with the affected worker(s), notify the police of the incident;
  - 8.1.7 arrange to provide staff with additional training (e.g., BMS, resources);



- 8.1.8 consult with centrally-based staff (e.g., Special Education, Corporate Risk - Health and Safety departments), as appropriate;
  - 8.1.9 remove items from the environment that could cause harm (e.g., be thrown, weaponized);
  - 8.1.10 obtain PPE for affected worker(s);
  - 8.1.11 develop and implement a specific safety plan for the affected employee(s) to ensure the health and safety of these employee(s) related to workplace violence. Monitor the specific safety plan for the employee(s) to ensure that it continues to protect them;
  - 8.1.12 as employees contribute an integral part in the prevention of workplace violence, encourage employees regularly to continue to complete the following actions:
    - 8.1.12.1 ensure internal security is implemented by locking doors and windows as appropriate;
    - 8.1.12.2 utilize the board's information and instruction for employees as provided;
    - 8.1.12.3 communicate workplace violence concerns to their supervisor;
    - 8.1.12.4 utilize the board's Employee Assistance Program as an information resource, as follow-up and support for at-risk employees, and providing counseling services; and,
    - 8.1.12.5 assist in identifying the risk of workplace violence that will likely expose an employee to physical injury by reporting their concerns to their administrator/supervisor.
- 8.2 **Summoning immediate assistance strategies**
- 8.2.1 The administrator/supervisor will ensure that appropriate measures and procedures are in place for summoning immediate assistance and are identified in the SP-NoWR (e.g., class phones, cell phones, walkie-talkies, etc.); and,
  - 8.2.2 Control measures put in place by the SP-NoWR should be implemented depending on the nature, location, and level of risk, this may include summoning assistance from the administrator/supervisor on site, the site BMS response team (as appropriate), and/or community assistance through 911. Measures will take into consideration the employee's location, specific assignments, and time of day (e.g., working during or outside regular hours).
- 9. Monitoring and evaluating prevention strategies/measures**
- 9.1 The administrator/supervisor will monitor the prevention strategies/measures implemented in response to health and safety incidents to ensure the identified risk has been appropriately mitigated. This can be achieved through:
    - 9.1.1 ongoing consultation with affected worker(s);
    - 9.1.2 review and analysis of recurring health and safety incidents; and,
    - 9.1.3 ensuring compliance with the preventative measures by affected worker(s).

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## Health and safety incident procedure summary

1. Health and safety incident occurs (note: this could include incidents of workplace violence).



2. Administrator/supervisor becomes aware of the incident, a verbal notification by the worker or through receipt of the online report form.



3. Administrator/supervisor begins the health and safety incident investigation as soon as possible, gathering all required information outlined in APM A2012



4. Administrator/supervisor identifies preventative measures through consultation with the affected worker(s) and/or central staff resources.



5. Administrator/supervisor communicates preventative measures to all affected worker(s)  
a. Verbally (document this notification)  
b. Written (email)



6. In situations involving workplace violence, administrator/supervisor updates the SP-NoWR, which must be documented and communicated.

a. If there is a WPV incident and no SP-NoWR is created or updated, the administrator/supervisor must provide rationale as to why this decision was made.



7. Administrator/supervisor monitors success of preventative measures through:

a. Regular and ongoing consultation with affected worker(s).  
b. Ensuring adherence to preventative measures.



8. If a related incident occurs, restart the process.

**Violence Threat Report Form**

<b>To be completed by superintendent/principal/vice-principal/manager/supervisor</b>	
Employee name:	
Job title:	School/location:
Details of the situation:	
Potential risk factors (check all that apply) <ul style="list-style-type: none"> <li><input type="checkbox"/> Concerned that threatener will assault, seriously injure employee?</li> <li><input type="checkbox"/> Recent escalation in frequency/severity of assaults or threats towards employee?</li> <li><input type="checkbox"/> Has threatener said they want to kill employee?</li> <li><input type="checkbox"/> Has threatener used or threatened to use a firearm or weapon?</li> <li><input type="checkbox"/> Does threat pose risk to any other individuals (co-workers, students)?</li> <li><input type="checkbox"/> Other? Include further information here if needed:</li> </ul>	
Have police been involved/notified? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Has the employee sought the assistance of any community programs? <input type="checkbox"/> Yes <input type="checkbox"/> No	
What strategies have been implemented at the worksite to ensure the safety of the affected employee and the safety of the workplace/school environment?	
What strategies have been recommended to the employee to assist in dealing with this situation?	
Administrator/supervisor's name:	Title:
Date:	
Is additional documentation relating to this concern attached: <input type="checkbox"/> Yes <input type="checkbox"/> No	
<b>***Administrator/supervisor to maintain a copy of this report in a secure confidential file Upon closure of the file, this report should be submitted to the Human Resource Services department.***</b>	