

2024

8.15 Employee Safety Planning Manual



School District 8
Kootenay Lake



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SAFETY PLANNING

Rationale

Working within the Safe, Orderly and Caring Schools Framework.

Our schools work hard to meet the educational, behavioural, and emotional needs of students, in classrooms that not only accommodate diversity, but that also provide optimum opportunities for learning. In British Columbia, a vision of how to meet some of these challenges is outlined in the document *Safe, Orderly and Caring Schools: A Guide*, (Ministry of Education, 2008). When we consider the role that safety planning has in this discussion, certain descriptors from this document are relevant.

Safe, orderly, and caring schools:

...are focused on prevention.

...respond consistently to incidents in a fair and reasoned manner, using interventions that repair harm, strengthen relationships, and restore a sense of belonging, and

...participate in policies, practices and procedures that promote school safety.

The safety planning process used by School District No.8 is consistent with these Ministry guidelines and may see as a demonstration of our effort to develop consistent practices and procedures that provide for the safety of district employees from the risk of violence from students.

Working within WorkSafe BC Framework

The safety planning process addresses the issue of violence toward school district staff members from students. Violence, as defined by WorkSafe BC, relates to “...the attempted or actual exercise by a person, other than a worker, of any physical force so as to cause injury to a worker, and includes any threatening statement or behaviour which gives a worker reasonable cause to believe that he or she is at risk of injury” (Occupational Health and Safety Regulation 4.27/WorkSafe BC, 2005).

In addition, WorkSafe regulations require that employers have procedures in place for assessing “the risk of injury to workers from violence in the workplace” and to “establish procedures, policies and work environment arrangements to eliminate the risk to workers from violence” or if this “is not possible, establish procedures, policies and work environment arrangements to minimize the risk to workers” (Occupational Health and Safety Regulation 4.28/Worksafe BC, 2005).

For more information and publications, see:

www.worksafebc.com



THEORETICAL BACKGROUND FOR SAFETY PLANNING

Safety Plans are Not Behaviour Plans

Safety planning is a process to protect the safety and well-being of staff and other students in an emergency situation, and more important, to prevent such situations from arising at all. Safety plans, while sharing some key components with behaviour support plans, are not effective intervention plans on their own, since they do not teach new skills or focus on long-term educational approaches designed to make problem behaviours unnecessary (Carr, 1997). Safety plans are one part of a larger intervention process, which would ideally include a functional behaviour assessment of the problem behaviours that would enable the team to develop a positive behaviour support plan for the student in question.

Safety Planning is a Process

It is fundamental to understand that safety planning in an educational context is a process that is designed to, in the language of Safe, Orderly and Caring Schools, “...respond consistently to incidents in a fair and reasoned manner, using interventions that repair harm, strengthen relationships and restore a sense of belonging” (Ministry of Education, 2004). Often, parents and school teams are traumatized by incidents of violence, and the writing of a safety plan can guide the team into a collaborative discussion about keeping staff safe while maintaining a positive focus on the student.

Safety Plans Utilize Behavioural Principles

Part of the safety planning process includes the identification of setting events and antecedents to behaviour, in an attempt to identify those situations where staff members are most at risk from a student behavioural escalation.

Prior Events (the situations that set the student up for a problem):

- Are most often events or situations that occur out of school and are biological, physiological, or social in origin.
- Do not cause the behaviour - but increase the probability that the student will react to antecedents at school ☞ May involve sleep, diet, physical health or family factors.
- Need the involvement of home to mitigate these factors.

Immediate Triggers:

- Are typically those situations or events that occurs at school just prior to a problem behaviour.
- Can be a particular work demand, a particular negative interaction with others, being ignored or a particular setting variable, such as too much noise or movement.



- May not always lead to problem behavior, but could, especially when prior setting events are present.

Safety Plans Seek to Identify the Stages of Escalation and Identify Appropriate Responses

The escalation cycle for aggression was first prototyped by Leonore Walker, in her 1979 book *The Battered Woman*. Since then, this escalation cycle has been employed widely in educational literature. In the following example, Brenda Smith-Myles and Richard Simpson describe the aggression cycle and appropriate responses in a school setting:

The Stages of Frustration and Appropriate Responses:

1. Anxiety: Student sighs or uses other nonverbal cues. Teacher can respond by active listening and nonjudgmental talk.
2. Stress: Student exhibits minor behavior problems. Teacher can use proximity control, boost student interest, or provide assistance with assignments.
3. Defensiveness: Student argues and complains. Teacher can remind student of rules, use conflict resolution, and encourage student to ask for help.
4. Physical Aggression: Student has lost control and may hit, bite, kick, or throw objects. Teacher can escort the student from class, get help, and protect the safety of the other children.
5. Tension Reduction: Student releases tension through crying or verbal venting or student may become sullen and withdrawn. Teacher can ... help the student gain insight into feelings and behavior. (Myles & Simpson, 1998),

The safety plan as used by School District No. 8 identifies four stages of escalation (anxiety, defensiveness, risk behaviour, and tension reduction). Immediate responses for each stage are identified and the safety plan team will identify appropriate student-specific responses for each stage.

PRACTICAL CONSIDERATIONS FOR SAFETY PLANNING

Use Trained District Staff

The safety plan process is most effective when trained district personnel are employed by school staff in the writing of a safety plan. In School District 8 - Kootenay Lake, the personnel who are trained are Principals, Inclusion Support Teachers, and CPI Trainers. Using trained district staff to write safety plans ensures that:

- There is a facilitator who is “somewhat” removed from the immediate situation,
- Consideration is given to safety planning as a process,
- The safety plan meets or exceeds WorkSafeBC expectations, and
- District personnel are informed of all incidents of violence.



Safety Plans are for Staff Safety

At times, schools may have concerns about the safety of students and request a safety plan. As a result of consultation with WorkSafeBC, currently safety plans are exclusively for incidents of violence or risk of violence toward staff. The safety plan process becomes cumbersome and difficult to administer if student to student incidents are included and it is difficult to delineate which incidents would involve a safety plan. In these circumstances, a response plan for a particular concern (such as leaving the school grounds) or a behaviour plan to improve peer to peer interactions would be appropriate.

Develop District Practices and Procedures

It is important to develop district practices and procedures so that all personnel in the district, particularly administrators, know when:

- A safety plan is necessary.
- A safety plan should be reviewed in 90 days after creation.
- A safety plan can be terminated.

Consistent implementation and documentation is critical for effective safety planning. It is also important to have procedures in place that ensure:

- All personnel on staff are aware of when a safety plan is needed:
 - All administrators need to bring procedures to staff meetings.
- Personnel working directly with the student have an opportunity to read the safety plan before working with the student:
 - Keep a special file at the front desk.
- That procedures are in place to have a signed copy in the student's school and district files:
 - Assign one person to be responsible.
- That appropriate support and follow-up is provided in any situation of violence toward staff members:
 - Desirable to have personnel with some dedicated time.

References

A Brief to the Royal Commission on Worker's Compensation in British Columbia from the British Columbia Teacher's Federation, May 1997, British Columbia Teacher's Federation, 100-550 West 6th Avenue, Vancouver, B.C., V5Z 4P2.

Carr, E., Levin, L., McConnachie, G., Carlson, J., Kemp, D & Smith, C., (1994). *Crisis Management*, in Communication-based intervention for problem behaviour. Baltimore: Paul. H. Brookes.

CUPE BC Health and Safety News, On-Line Newsletter, September 2005.



Ministry of Education, British Columbia, (2008). *Safe, Caring, Orderly Schools: A Guide*: Queen's Printer, Victoria, British Columbia, Canada.

Nonviolent Crisis Intervention Foundation Course. Crisis Prevention Institute, Inc. (2015).

Occupational Health and Safety Regulations (2005), Worker's Compensation Board of BC (WorkSafeBC). Crown Publications, Victoria, BC, Canada.

DISTRICT POLICY/PROCEDURES

Overview

Safety Plans:

- Are risk control plans implemented when there is reasonable cause to believe that a student may injure a staff member or district employee.
- Satisfy the WorkSafeBC requirements and district need for employees to be informed of the potential risk of workplace violence and to mitigate against the possibility of such risks.
- Do not work to improve the behaviour of students.
- Require careful documentation and implementation.
- Should always be followed by the development or review of a behaviour support plan.

A safety plan should be written if:

- A file review reveals a real possibility of danger to staff
- There is an incident that causes injury to staff or staff members to feel unsafe.

It is important to not just dismiss a staff member's request for a safety plan.

Worker's Report of Injury, Occupational Disease, Violence or Near Miss.

When an incident of violence directed towards staff occurs, the following steps must be followed.

1. Incidents of violence as defined by the WorkSafeBC, must be reported promptly to the administrator or designate by the affected staff member or district employee using the **Worker's Report of Injury, Occupational Disease, Violence or Near Miss** located in the school office. The completed report must be forwarded as per the directions.
2. The administrator or designate must initiate an investigation immediately following a report of violence directed toward a staff member or district employee.



3. During the investigative process, it may be appropriate to send home or suspend the student in question for behaviours that are concerning and/or violent. **Note:** On a case-by-case basis, it may be necessary to restrict the student from returning to school until a safety plan is developed or amended. Please consult with the Director of Instruction - Inclusive Education in the case of a student with special needs.
4. The administrator will complete the Workplace Risk Assessment (WRA) form to determine if a safety plan is required for the student. **Note:** If the incident in question involves student threat making behaviour and not physical contact or aggression, the Risk Assessment Protocol must be implemented in place of completing a WRA form.
5. A Safety Plan must be written when:
 - There is reasonable cause to believe that a student may injure a school district employee.
 - An incident has required that a student be physically restrained.
 - A Workplace Risk Assessment (WRA) form indicates a risk of violence to staff.
6. Based on the results of the investigation and completion of a WRA form following a concerning incident, the administrator or designate will call a meeting within 3 business days (if appropriate), to design a safety plan as an action to control risk.
7. A member of district staff from Inclusive Education Services, trained in writing safety plans will assist/consult with the development of a safety plan.
8. A meeting will be convened which must include the administrator or designate, all personnel who work directly with the student, the parent(s) or guardian(s) of the student, and a member of district staff from Inclusive Education Services.
9. A safety plan will be written and include:
 - Awareness of early warning signs relative to escalation of behaviour.
 - Strategies for early intervention, de-escalation, and appropriate responses to end escalating behaviours.
 - A progress crisis intervention plan that details staff actions, specifically:
 - Keeping a safe distance,
 - Clearing the area,
 - Assigning a team leader who directs the actions of intervening adults, and
 - Physical restraint strategies as a last resort when there is a danger to self/others, and a plan to train staff (if necessary) in crisis response.
 - A place to sign and date the safety plan.
 - A reintegration plan for a student restricted from attending school until a safety plan is developed/modified (see # 3 above).



- A review and/or termination date.
10. The administrator or designate will review all safety plans and risk assessments and communicate hazards at regularly scheduled meetings of the school **Joint Health and Safety Committee**. **Names will not be used in minutes or during the review.*
 11. A meeting must be called to **review and/or modify** an existing safety plan if a change occurs such that the risk of violence between a student and a staff member is different and/or an incidence of violence occurs.
 12. The safety plan will require careful documentation:
 - All persons who attended the safety plan meeting are encouraged to sign one copy of the completed safety plan.
 - A copy of the safety plan must be kept at the administrative office and all personnel (e.g., TTOC, bus drivers, etc.) who will work with the student in question must read the safety plan and sign that they have done so before interacting with the student. **Note: The administrator or designate is responsible to ensure that this provision is followed.**
 - A copy of the signed safety plan must be forwarded to the Director of Instruction - Inclusive Education and Manager of Safe Schools for documentation purposes.
 13. If any required member of the safety plan development group refuses to sign the plan or attend the meeting, the administrator or designate must contact the Director of Instruction - Inclusive Education.

WORKPLACE RISK ASSESSMENT (WRA)

Overview

The Workplace Risk Assessment (WRA) form completion requirements are in accordance with Workers' Compensation Board Inspection Report Orders and the Workers' Compensation Board Occupational Health and Safety Regulations - Violence in the Workplace 4.27 through to 4.31. These are available online at <https://www.worksafebc.com/en/law-policy/occupational-health-safety/searchable-ohs-regulation>.

Instruction

The Workplace Risk Assessment form assesses the threshold of student violence directed toward a school district employee. Ultimately, the purpose of completing this form is to determine if a threshold of violence has been met (see below) that warrants the development of a safety plan.

The WRA form must be completed by the administrator or designate when:



1. Early identification (i.e., file review, information sharing, interview, etc.) indicates that reasonable cause exists that a student has presented concerns (i.e., violence directed toward a school district employee) in the past, or
2. Incidents of student violence directed toward a school district employee are reported by the employee to the administrator or designate.

When completing the WRA form it is essential that consideration be taken of previous employee experience with the student. Conducting a Permanent Records file review and speaking directly to involved staff to determine if a prior risk was established normally accomplish this. When the WRA form is being completed for the first time because a student new to the school system (arriving from pre-school, home school, or other district) presents concerns, contact with persons who have recent experience with the student is required.

The WRA must be reviewed by the Joint School Health and Safety Committee.

Please feel free to contact the Director of Instruction - Inclusive Education at any time with regard to WRA form completion.

Violence Threshold Indicator

A safety plan is MANDATORY when:

1. The **Intensity indicator** on the WRA form exceeds “Low”, or
2. The **Frequency indicator** on the WRA form exceeds “Low” while the **Intensity indicator** exceeds “None”.

When a risk to staff safety is determined, it is essential that a safety plan be established as soon as possible. (IMMEDIATELY)