



BRANT HALDIMAND NORFOLK Catholic District School Board

Agenda

Catholic Education Centre
322 Fairview Drive
Brantford, ON N3T 5M8

Policy Committee Meeting Tuesday June 10, 2025 ♦ 3:30 p.m. Boardroom

Trustees:

Dan Dignard (Chair), Dennis Blake, Bill Chopp, Carol Luciani, Rick Petrella (on leave), Mark Watson

Senior Administration:

Mike McDonald (Director of Education & Secretary), Rajini Nelson (Superintendent of Business & Treasurer)
John Della Fortuna, Kevin Greco, Michael Lawlor, Phil Wilson (Superintendents of Education)

1. Opening Business

- 1.1 Opening Prayer
- 1.2 Attendance
- 1.3 Approval of the Agenda
- 1.4 Approval of Minutes from the Policy Committee Meeting – May 13, 2025 Pages 2-5
- 1.5 Business Arising from the Minutes

2. Committee and Staff Reports

- 2.1 Workplace Violence Prevention #300.20 Pages 6 -15
Presenter: Kevin Greco, Superintendent of Education
- 2.2 Workplace Harassment #300.02 Pages 16-28
Presenter: Kevin Greco, Superintendent of Education
- 2.3 Duty to Report #300.23 Pages 29-37
Presenter: Kevin Greco, Superintendent of Education
- 2.4 Use of Service Animals in School Facilities #200.40 Pages 38-63
Presenter: Phil Wilson, Superintendent of Education
- 2.6 Purchasing Cards #700.01 Pages 64-68
Presenter: Mike McDonald, Director of Education & Secretary

3. Adjournment

Next meeting: July 16, 2025



BRANT HALDIMAND NORFOLK Catholic District School Board

Minutes

Catholic Education Centre
322 Fairview Drive
Brantford, ON N3T 5M8

Policy Committee Meeting Tuesday May 13, 2025 ♦ 4:00 p.m. Boardroom

Trustees:

Dan Dignard (Chair), Dennis Blake, Carol Luciani, Mark Watson

Regrets: Bill Chopp

Senior Administration:

Mike McDonald (Director of Education & Secretary), Rajini Nelson (Superintendent of Business & Treasurer), John Della Fortuna, Michael Lawlor, Phil Wilson (Superintendents of Education)

Regrets: Kevin Greco (Superintendent of Education)

1. Opening Business

1.1 Opening Prayer

The meeting was opened with prayer led by Chair Dignard.

1.2 Attendance

Attendance was noted as above.

1.3 Approval of the Agenda

Moved by: Carol Luciani

Seconded by: Dennis Blake

THAT the Policy Committee of the Brant Haldimand Norfolk Catholic District School Board approves the agenda of the May 13, 2025, meeting.

Carried

1.4 Approval of Minutes from the Policy Committee Meeting – April 8, 2025

Moved by: Mark Watson

Seconded by: Dennis Blake

THAT the Policy Committee of the Brant Haldimand Norfolk Catholic District School Board approves the minutes of the April 8, 2025, meeting.

Carried

2. Committee and Staff Reports

2.1 Home School Policy #200.16

Superintendent Della Fortuna presented the Home School policy. The policy promotes collaboration between families and schools and encourages continued connection with school principals and parishes to support both educational development and faith formation. Some of the key changes include parents submitting written notification of their intent to homeschool annually by September 1, along with the availability to enroll part time in specialized subjects, access to ministry supported online learning platforms and a new emphasis on mental health as per PPM 168. Continuity of renewal requests for September 1 across all pages in the policy was requested.



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Moved by: Carol Luciani

Seconded: Mark Watson

THAT the Policy Committee recommends that the Committee of the Whole refers the Home School Policy #200.16 to the Brant Haldimand Norfolk Catholic District School Board for approval.

Carried

2.2 Home Instruction Policy #200.17

Superintendent Della Fortuna presented the Home Instruction policy. The key changes made include enhancing accessibility, compliance with ministry guidelines and alignment with modern learning practices. One of the most significant updates is the removal of the three-week waiting period allowing students to receive home instruction as soon as medication documentation is provided. The policy acknowledges Individual Education Plans to support students requiring accommodation and includes clearer definitions of roles and responsibilities for Superintendents, Principals, Classroom Teachers, Home Instruction Teachers, and parents/guardians to ensure a structured and accountable process.

Moved by: Mark Watson

Seconded: Dennis Blake

THAT the Policy Committee recommends that the Committee of the Whole refers the Home Instruction policy #200.17 to the Brant Haldimand Norfolk Catholic District School Board for approval.

Carried

2.3 Student Clubs Administrative Procedure #200.44

Superintendent Wilson presented the Student Clubs Administrative Procedure. Minor updates have been made to reflect current practices and reaffirm commitments to student safety, inclusion, and faith formation.

Moved by: Carol Luciani

Seconded by: Mark Watson

THAT the Policy Committee recommends that the Committee of the Whole refers the Student Clubs Administrative Procedure to the Brant Haldimand Norfolk Catholic District School Board for approval.

Carried

2.4 Opening/ Closing Exercises Administrative Procedure #200.11

Superintendent Wilson presented the Opening/ closing exercises administrative procedure. Updates include clarifying the process for incorporating the recitation of the pledge of citizenship, strengthens expectations around the delivery of the Land Acknowledgement along with minor administrative and formatting adjustments.

Moved by: Carol Luciani

Seconded by: Dan Dignard

THAT the Policy Committee recommends that the Committee of the Whole refers the Opening/ Closing Exercises Administrative Procedure #200.11 to the Brant Haldimand Norfolk Catholic District School Board for approval.

Carried



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2.5 Head Lice (Pediculosis) #200.20

Superintendent Wilson presented the updated Head Lice (pediculosis) policy. In recent years, the role of schools in managing pediculosis has shifted from immediate removal of affected students to a more supportive, educational approach. The focus is now on minimizing disruption to learning while emphasizing education, prevention, and family responsibility for treatment. Schools are tasked with communicating regularly with parents, protecting student dignity and privacy, and supporting a consistent response that avoids academic penalties or exclusion due to lice. Clarification was requested regarding next steps in the event of an outbreak within a classroom and it was confirmed that all decisions would be made in consultation with public health.

Moved by: Dennis Blake

Seconded by: Mark Watson

THAT the Policy Committee recommends that the Committee of the Whole refers the Head Lice Policy #200.20 to the Brant Haldimand Norfolk Catholic District School Board for approval.

Carried

2.6 Employee Expenses #700.04

Superintendent Nelson presented the employee expenses policy. The revisions made to the policy align with the Broader Public Sector (BPS) Expense directive, ensuring consistency and accountability across the organization. Two significant changes involve the prohibition of alcohol while conducting board business and the pre-approval process for high cost or out of province conference travel. Clarification was requested regarding the approval process for the Director of Education's expenses. It was confirmed that the Chair of the Board approves the Directors expenses. A recommendation was made to have out of province and out of country travel for employees be made in consultation with the Board of Trustees. This discussion item will be brought back to Executive Council for further discussion.

Moved by: Mark Watson

Seconded by: Carol Luciani

THAT the Policy Committee recommends that the Committee of the Whole refers the Employee Expenses Policy #700.04 to the Brant Haldimand Norfolk Catholic District School Board for approval.

Carried

2.7 Procurement Policy #700.01

Superintendent Nelson presented the procurement policy. The policy changes include alignment with current legislation, trade agreements, and accessibility standards. The changes made to the purchasing approval authority levels for the purchase of goods and non-consulting services were discussed and are reflective of current market conditions and in line with other school boards across the sector.

Moved by: Mark Watson

Seconded by: Dennis Blake

THAT the Policy Committee recommends that the Committee of the Whole refers the Procurement Policy #700.01 to the Brant Haldimand Norfolk Catholic District School Board for approval.

Carried



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3.0 Adjournment

Moved by: Carol Luciani

Seconded by: Mark Watson

THAT the Policy Committee of the Brant Haldimand Norfolk Catholic District School Board adjourns the May 13, 2025 Policy committee meeting.

Carried.

Next meeting: TBD – Boardroom

REPORT TO THE BRANT HALDIMAND NORFOLK CATHOLIC DISTRICT SCHOOL BOARD POLICY COMMITTEE

Prepared by: Kevin Greco, Superintendent of Education
Presented to: Policy Committee
Submitted on: June 10, 2025
Submitted by: Mike McDonald, Director of Education & Secretary

Workplace Violence Prevention #300.20

BACKGROUND INFORMATION:

The Brant Haldimand Norfolk Catholic District School Board (the Board) is committed to fostering a Christ-centered, safe, respectful, and healthy working and learning environment for all staff, students, volunteers, visitors, and community members. This policy is enacted in accordance with the principles of Catholic Social Teaching, and compliance with the Ontario Human Rights Code, Occupational Health and Safety Act, R.S.O. 1990, c. O.1 (OHSA), the Education Act, R.S.O. 1990, c. E.2, and associated regulations.

The Board recognizes that the inherent right of all individuals to be treated with dignity and respect is central to Catholic values and beliefs and supports a safe and nurturing environment for all staff and students. As a Catholic Learning Community, we believe in the prevention of workplace violence and promoting a workplace in which all people including employees, supervisors, and members of the public respect one another and work together to achieve common goals.

The Board has a legal, ethical and moral responsibility to investigate threats and acts of violence against any employee. The purpose of this policy is to define and communicate expectations, roles, and responsibilities in preventing, reporting, and addressing workplace violence within our school board community. This policy applies to all employees, trustees, students, parents/guardians, volunteers, contractors, and members of the public who interact with the Board at Board workplaces, during Board-sponsored activities, and offsite Board business.

DEVELOPMENTS:

This Policy and Administrative Procedure has been updated with definitions from the *Occupational Health and Safety Act (OHSA)* for: worker, critical Injury and resource person.

The Responsibilities section now includes the duty of trustees to approve and support the implementation of this policy and for the Director of Education and Senior Administration to ensure compliance with the OHSA and the Education Act and that all employees must complete Workplace Violence Prevention Training annually. There is also reference to leveraging support from the Joint Health and Safety Committee.

This Policy and Administrative Procedure now includes the responsibility of each school/site of the Board to develop and implement procedures for summoning immediate assistance when an employee is the victim or witness to a violent incident in the workplace, or when a violent incident in the workplace is likely to occur.

Anyone involved as a victim or witness to a violent incident will be assured confidentiality and protection from reprisal when involved in a report or investigation.

RECOMMENDATION:

THAT the Policy Committee recommends that the Committee of the Whole refers Policy and Administrative Procedure #300.20 Workplace Violence Prevention to the Brant Haldimand Norfolk Catholic District School Board for approval.



Workplace Violence Prevention

#300.20

Adopted:	June 22, 2010
Last Reviewed/Revised:	<u>May 1, 2025</u>
Responsibility:	Superintendent of Education
Next Scheduled Review:	<u>May 1, 2029</u>

POLICY STATEMENT:

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The Board recognizes that the inherent right of all individuals to be treated with dignity and respect is central to Catholic values and beliefs and supports a safe and nurturing environment for all staff and students. As a Catholic Learning Community, we believe in the prevention of workplace violence and promoting a workplace in which all people including employees, supervisors, and members of the public respect one another and work together to achieve common goals.

The Board is committed to protecting employees from workplace violence from all sources. Violent behaviour in the workplace is unacceptable conduct and erodes the mutual trust and confidence that is essential to the well-being of our staff.

APPLICATION AND SCOPE:

The Board has a legal, ethical and moral responsibility to investigate threats and acts of violence against any employee. The purpose of this policy is to define and communicate expectations, roles, and responsibilities in preventing, reporting, and addressing workplace violence within our school board community. This policy applies to all employees, trustees, students, parents/guardians, volunteers, contractors, and members of the public who interact with the Board at Board workplaces, during Board-sponsored activities, and offsite Board business.

It is Policy of the Board that:

- Every reasonable precaution in the circumstances is taken to protect employees from all sources of workplace violence; this includes protecting employees from the hazard of workplace violence [section 25(2)(h) Occupational Health and Safety ActOHSA].
- ~~There is an administrative procedure that implements this policy, which will outline the responsibilities of all parties and include measures and procedures to protect employees from workplace violence, a means of summoning immediate assistance and a process for employees to report incidents, or raise concerns;~~
- Information and instruction on the contents of this policy and the accompanying administrative procedure are provided to the employee to protect the health and safety of the employee [section 25(2)(a) Occupational Health and Safety ActOHSA];
- Equipment, materials and protective devices provided by the Board are maintained and in good condition [section 25(1)(b) Occupational Health and Safety ActOHSA]
- The Board's responsibilities relating to workplace violence are identified in terms of awareness, prevention and response;
- Assessment(s) reviewing the risks of violence in the workplace are conducted annually on or before November 30, and as often as necessary thereafter in accordance with the provisions of the Occupational Health and Safety ActOHSA to ensure protection of employees from workplace violence;
- Assistance and cooperation are provided to the Joint Health and Safety Committee(JHSC); and
- The person reporting a violent incident or any person who is negatively impacted by a violent act in the workplace is supported and will not be criticized or reprimanded for having made the report.

REFERENCES:



- Occupational Health and Safety Act and Regulations
- Ontario Human Rights Code
- Education Act
- Municipal Freedom of Information and Protection of Privacy Act (MFIPPA)
- 200.09 Catholic Code of Conduct: Positive Student Behaviour, Progressive Discipline and Safety
- 200.13 Notification of Risk of Injury and Student Safety Plan Policy and Administrative Procedure
- 300.01 Workplace Harassment Policy and Administrative Procedure
- 300.16 Health and Safety Policy and Administrative Procedure
- 300.21 Work Refusal Administrative Procedure
- 400.04 Emergency Response Plan Policy
- 400.06 Security of Schools, Buildings and Grounds Policy
- 400.11 Video Security Surveillance Policy
- 400.15 Protection of Property Policy

FORMS:

- Violent Incident Report – Form 1 (located in the BHNCDSB Online Reporting Tool) N/A.

APPENDICES:

- N/A.

DEFINITIONS:

Bullying: aggressive and typically repeated behaviour (includes the use of any physical, verbal, electronic, written, or other means) where:

- a) The behaviour is intended to have the effect of or ought to reasonably be known that the behaviour would be likely to have the effect of:
 - i. Causing harm, fear or distress to another individual, including physical, psychological or social harm, harm to the individual's reputation or harm to the individual's property, or
 - ii. Creating a negative environment for another individual, and
- b) The behaviour occurs in the context where there is a real or perceived power imbalance based on factors such as size, strength, age, intelligence, economic status, social status, religion, ethnic origin, sexual orientation, family circumstances, gender, gender identity, gender expression, race or disability

Complainant: a person who considers that he/she has been subjected to workplace violence related reprisal even though that individual may not lay a formal written complaint. Similarly, a person named as harasser in a complaint will be referred to as the Respondent.

Critical Injury: as defined in the ~~Occupational Health and Safety Act~~ OHSA, means an injury of serious nature that,

- a) Places life in jeopardy
- b) Produces unconsciousness
- c) Results in substantial loss of blood
- d) Involves the fracture of a leg or arm but not a finger or toe,
- e) Involves the amputation of a leg, arm, hand or foot but not a finger or toe,
- f) Consists of burns to a major portion of the body, or
- g) Causes the loss of sight in an eye.

Domestic Violence: a pattern of coercive behaviour that is used by one person in an intimate relationship to gain power and control over. Domestic violence includes physical, sexual, emotional, psychological and financial abuse. Involves a person who has a relationship with a worker – such as a spouse or former spouse, current or former intimate partner or a family member – who may harm, or attempt or threaten to physically harm that worker at work. In these situations, domestic violence is considered workplace violence.



Resource Person: Principals, Managers, Supervisors, Supervisory Officer responsible for Human Resources or the Director of Education.

Sexual Violence: any sexual act, or act targeting a person's sexuality, gender identity, or gender expression, whether the act is physical or psychological in nature; that is committed, threatened, or attempted against a person without the person's consent, and includes sexual assault, sexual harassment, stalking, indecent exposure, voyeurism, and sexual exploitation.

Workplace: any place where employees perform work or work-related duties or functions. Schools and school-related activities such as extracurricular activities and excursions comprise the workplace, as do the Board office and facilities. In addition, conferences and training sessions fall within the scope of the workplace.

Worker: Any person defined as a worker under the OHSA, including staff, volunteers, and interns

Workplace Violence: as defined in the ~~Occupational Health and Safety Act~~ OHSA, means:

- The exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker;
- An attempt to exercise physical force against a worker, in a workplace, that could cause physical injury to the worker; and
- A statement or behaviour that is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker.

ADMINISTRATIVE PROCEDURES:

This Administrative Procedure was developed to support and implement Policy 300.20; to clarify roles and responsibilities, and to assist employees and their supervisors in preventing, responding to, reporting and managing workplace violence.

This policy applies to all Board employees, trustees and other users of the Board's facilities, such as members of consultative committees, parents, volunteers, contractors and employees of other organizations not related to the Board, but who work on or are invited onto Board premises. This policy also covers workplace violence by such persons which are proven to have repercussions that adversely affect the Board's learning and working environment.

This policy addresses workplace violence under the ~~Occupational Health and Safety Act~~ OHSA and applies to all employees. The policy addresses workplace violence from all sources which may include: employees, supervisors, trustees, students, parents, suppliers and members of the public.

The rights of students to a respectful working and learning environment, free from violence, are dealt with separately under applicable policies, legislation or regulations including, but not limited to, the Education Act, Ontario Schools Code of Conduct and codes of behaviour.

1.0 RESPONSIBILITIES

1.1 Shared Responsibility: Every Person involved with or working for the Board must:

- Treat co-workers, students and the public with respect and dignity;
- Reduce incidents of workplace violence, domestic violence and workplace sexual violence by practicing principles of prevention;
- Understand and comply with the Workplace Violence Prevention Policy, 300.20 and all related procedures; and
- Maintain confidentiality.

1.2 Trustee Responsibilities:

- Approve and support the implementation of this policy.

1.3 Director of Education and Senior Administration Responsibilities:



- Ensure compliance with the OHSA and the Education Act.
- Allocate necessary resources for training and program implementation.

1.31.4 Management Responsibilities:

The Principal/Supervisor will:

- Implement preventative measures and promote safe work environments.
- Ensure an employee works in a manner and with the protective devices, measures and procedures required by OHSA and its regulations [section 27(1)(a) OHSA];
- Ensure an employee uses or wears the equipment, protective devices or clothing that the employer requires to be used or worn [section 27(1)(b) OHSA];
- Identify and manage risks, and develop and implement prevention strategies that eliminate or reduce the risk;
- Create safe work plans;
- Advise an employee of the existence of any actual or potential danger to the health and safety of the employee of which the supervisor is aware [section 27(2)(a) OHSA];
- Take every precaution reasonable in the circumstances to protect employees [section 27(2)(c) OHSA];
- Investigate all cases of alleged violence reported by employees in a fair and timely manner; and
- Promote codes of conduct during each school year and provide employees with appropriate training related to the tasks they perform, in order to assist with recognizing the potential for violent acts and understanding how to deal with violent acts in the workplace.
- Conduct workplace violence risk assessments.
- Investigate reported incidents promptly.
- Communicate risks and updates to Joint Health and Safety Committees (JHSCs).

Principals/Supervisors are reminded to inform their staff about:

- Policies and guidelines related to workplace violence and harassment.
- How to access or summon immediate assistance.
- Potential violent situations.
- Individuals with a violent past in circumstances where the employee can be expected to encounter the violent person in the course of his or her work and the risk of workplace violence is likely to expose the employee to physical injury.
- Safe work plans.
- Workplace violence and harassment reporting procedures as outlined in the Workplace Violence Prevention Policy and Administrative Procedure and Workplace Harassment Policy and Procedure.
- Workplace violence and harassment investigation procedures as outlined in the Workplace Violence Prevention Policy and Administrative Procedure and Workplace Harassment Policy and Procedure.

1.41.5 Employee Responsibilities:

The employee will:

- Work in compliance with the OHSA and its regulations [section 28(1)(a) OHSA];
- Use or wear equipment, protective devices or clothing required by the employer [section 28(1)(b) OHSA];
- Report the absence of, or defect in, any equipment or protective device of which the employee is aware [section 28(1)(c) OHSA];
- Report any contravention of the OHSA or its regulations, or the existence of any hazard the employee knows of, to the employer or Supervisor [section 28(1)(d) OHSA];
- Not engage in any prank, contest, feat of strength, unnecessary running or rough and boisterous conduct [section 28(2)(c) OHSA]. While this type of behaviour may not constitute workplace violence, it must not be allowed. If allowed to continue, this behaviour may escalate into workplace violence; and
- Complete the mandatory Violence and Harassment in the Workplace online training module within one month of date of hire.
- Cooperate with investigations.



Employees must know how to:

- ~~Know how to~~ summon immediate assistance;
- ~~Know how to~~ report incidents of workplace violence to the Board and/or their Supervisor;
- ~~work with the~~ ~~Know that the~~ employer to will investigate and deal with incidents, threats or complaints;
- ~~Know, understand and be able to~~ carry out the measures and procedures that are in place to protect them from workplace violence; and
- ~~Be able to~~ carry out any other procedures that are part of this administrative procedure.

1.6 Joint Health and Safety Committee Responsibilities:

- Review reports of workplace violence.
- Recommend improvements to prevent workplace violence.
- Be consulted in risk assessments and program reviews.

1.51.7 Responsibilities Related to Domestic Violence:

1.5.41.7.1 Employees must be informed that they can report their concerns to the Principal/Supervisor if they fear domestic violence may enter the workplace. If this occurs, the Principals/Supervisors are responsible for creating an individual safety plan for the employee while they are at work. The safety plan should be developed in consultation with the employee.

1.5.21.7.2 An employer can become aware of domestic violence when an incident takes place at work or when concern is raised by an employee, co-worker, or someone else. Other indications could be threatening emails or phone calls at work or unwanted visits to the workplace by the aggressor. An employee must advise their Principal/Supervisor if they have applied for or obtained a restraining order that lists a work location as a protected area or requires a person to remain a certain distance from the employee at all times.

1.5.31.7.3 The Ministry of Labour states that even if the employee does not want any steps taken, the employer may still be required to take some action to protect the employee, depending on the circumstances. Principals and supervisors should work closely with a targeted employee to develop reasonable precautions to address the situation while attempting to respect the employee's privacy and sensitivity of the issue.

2.0 INFORMATION

2.1 Legislative Requirements

- 2.1.1** The OHSA includes workplace violence and workplace sexual violence as a hazard for which employers must develop prevention and response strategies.
- 2.1.2** These procedures support this legislated requirement and the Board's commitment to providing a safe working environment.
- 2.1.3** Under the OHSA, an employer must take every reasonable precaution under the circumstances for the protection of workers, when they are aware, or ought reasonably to be aware, that domestic violence may occur in the workplace and that it would likely expose a worker to physical injury.

2.2 Work Refusal

- 2.2.1** Under the OHSA, an employee can refuse to work if he or she has reason to believe he or she may be endangered by workplace violence [section 43(3)(b.1) OHSA].
- 2.2.2** The Act sets out a specific procedure that must be followed in a work refusal. It is important for all employees, supervisors and Joint Health and Safety Committees representatives to understand and follow this procedure. Teachers, however, cannot refuse work when a pupil's life, health or safety is in imminent jeopardy [section 3(3) of Regulation 857 (Teachers)]. For more information regarding Work Refusal, please refer to the Board's Work Refusal Administrative Procedure 300.21.

2.3 Personal Information Limits

- 2.3.1** The ~~Ontario~~ Occupational Health and Safety Act clarifies that employers and supervisors must provide employees with information, including personal information, related to a risk of workplace



violence from a person with a history of violent behaviour [section 32.0.5(3)]. However, this duty is limited and applies only when the:

- Employee can be expected to encounter the violent person in the course of his or her work; and,
- The risk of workplace violence is likely to expose the employee to physical injury.

2.3.1 Employers and supervisors must not disclose more information than is reasonably necessary for the protection of an employee from physical injury.

3.0 Summoning Immediate Assistance

- 3.1** Each school/site of the Board must develop and implement procedures for summoning immediate assistance when an employee is the victim or witness of a violent incident in the workplace, or when a violent incident in the workplace is likely to occur.
- 3.2** Procedures for summoning immediate assistance may vary depending on the circumstances. For example, summoning immediate assistance on a field trip may differ from summoning immediate assistance in a classroom.
- 3.3** Means of summoning immediate assistance include but are not limited to public address (PA) systems, handheld radios (walkie-talkie), phone/cellphone, panic buttons, code words, yelling for assistance from co-workers, and depending on the severity of the actual, attempted, or threatened workplace violence, it may be necessary to contact police or emergency services.
- 3.4** All employees who are expected to respond to the need for immediate assistance must be given instruction on their roles and responsibilities when responding to a violent incident.
- 3.5** The principal/supervisor will ensure that their school/site has sufficient procedures for summoning immediate assistance. If communication devices are used, they must be tested regularly to ensure they are operational and maintained as required.

4.0 Responding to an Act of Violence that Requires Immediate Assistance

4.1 The following immediate action needs to be taken when an Act of Violence occurs that poses an immediate risk of physical injury:

- 4.1.1** Control workplace access.
- 4.1.2** In the case of a critical injury, immediately report the incident to the Health and Safety Coordinator, or in their absence, another member of the Human Resources Department in accordance with the Incident/Accident Reporting procedures. The incident scene is to be preserved until an Inspector from the Ministry of Labour has had an opportunity to view it or to instruct you otherwise. A Joint Health and Safety representative may inspect the place where the injury occurred as indicated in the OHSAA [section 8(14)].
- 4.1.3** Call the police when an act **or threat of violence** has occurred or when someone is threatened with violence in the workplace in the workplace presents imminent danger.
- 4.1.4** All incidents of violence/threat must be reported to the school's Supervisory Officer.
- 4.1.5** All incidents need to be documented **via the Board's Online Reporting System.**
- 4.1.6** Consideration must be given as to who needs to be immediately informed (i.e., family members).
- 4.1.7** A list of potential witnesses needs to be developed.
- 4.1.8** In consultation with the Supervisory Officer, or with Senior Management, an initial analysis ought to be conducted which will include a plan for the incident investigation.

5.0 Reporting Workplace Violence – Non-Immediate Assistance

5.1 Employees with concerns regarding workplace violence (actual violence, attempted violence, threatened violence) that do not require an immediate response (including concerns about domestic violence that may flow into the workplace) should follow the procedure below:

- 5.1.1** A person (Complainant) who considers that he/she has been subjected to or witnessed workplace violence, domestic violence, or sexual violence in the workplace, is required and encouraged to report an act of violence and should report the incident **via the Board's Health and Safety Reporting System, and** to their direct Supervisor immediately and seek any medical or emergency attention if required.
- 5.1.2** Where a person (Complainant) does not feel comfortable in reporting the matter to their direct supervisor, or in the case where the direct supervisor is alleged to have perpetrated the violent act, the Complainant should report the violence to the next higher level of management, who is in position to provide guidance and assistance with the complaint (i.e. Supervisor, Principal, Manager, Superintendent, Director, Ministry of Labour).
- 5.1.3** The Resource Person **assisting the Complainant** will advise the Complainant of the following:



- 5.1.3.1 The option of requesting the assistance of his/her principal, supervisor, in resolving the complaint. If the principal/supervisor is the person named by the Complainant, the Complainant should request assistance from the next higher level of management.
 - 5.1.3.2 The option of other avenues of recourse such as the right to utilize any applicable provisions of the Collective Agreement, file a complaint with the Ministry of Labour, file a complaint with the Ontario Human Rights Commission, take civil action, or where appropriate, the right to file charges under the Criminal Code.
 - 5.1.3.3 The availability of counseling and other support services provided by the Board;
 - 5.1.3.4 The right to file a formal written complaint under the Workplace Violence Prevention Policy 300.0120 when the alleged perpetrator is an employee of the Board;
 - 5.1.3.5 The right to be represented or assisted by a union representative (as outlined in the applicable Collective Agreement) throughout the process;
 - 5.1.3.6 The right to withdraw from any further action in connection with the complaint, at any stage (even though the Board may need to continue to investigate the complaint).
 - 5.1.4 All incidents or complaints of workplace violence will be kept confidential except to the extent necessary to protect employees, to investigate the complaint, to take corrective action or as otherwise required by law.
 - 5.2 ~~Under the Workplace Violence Prevention Policy 300.0120, employees are required and encouraged to report an act of violence. Individuals who file a report or participate in an investigation under the Workplace Violence Prevention policy will be protected from reprisal or any negative consequences which may result from acting in accordance with this policy.~~ stated above

6.0 Conducting the Investigation

- 6.1 Following a violent event, the investigation process must be implemented immediately. The immediate supervisor (Principal/Supervisor/Superintendent) of the employee will conduct an investigation and may consult the Health & Safety Coordinator;
- 6.2 Where the immediate supervisor is the subject of the complaint, the next level of management will be responsible for conducting the investigation in consultation with the Health & Safety Coordinator;
- ~~6.3 A Ministry of Labour Health & Safety Inspector may, in writing, order an employer to cause an investigation described in clause 32.0.7(1)(a) of the Occupational Health & Safety Act to be conducted, at the expense of the employer, by an impartial person possessing such knowledge, experience or qualifications as are specified by the inspector, and to obtain, at the expense of the employer, a written report by that person from harassment section~~
- 6.4 The investigation must be fair, impartial and timely.
- 6.5 The principal/supervisor in consultation with Senior Management and, if applicable, the Ministry of Labour will determine whether it is reasonable to reassign employees or students (who may be victims of violent behaviour) while the investigation is in progress. Such transfers and reassignments are administrative measures and are not disciplinary in nature. These decisions may be necessary to ensure the safety of the employee in the workplace and also to ensure the integrity of the investigation.
- 6.26.6 Until the investigation is completed, the employee shall remain in a safe place as near as possible to his or her workstation and, if applicable, be available to the Ministry of Labour Inspector for the purposes of the investigation.
- 6.36.7 The Board will provide medical/medical, and counseling support as deemed necessary in the circumstances, consistent with programs described in collective agreements or by Board policy applicable to non-unionized staff.
- 6.46.8 During the investigation, unionized employees will be advised of their collective agreement rights.
- 6.56.9 It is critical that all relevant information be obtained; this means that a violent incident or unusual and threatening behaviour needs to be investigated with the persons/people directly involved. This will include the



person who reports the violence or the potentially violent circumstances, those to whom the violent behaviour was directed, other witnesses and the person or persons who are alleged to have engaged in ~~the~~ violent conduct.

6.66.10 The investigation results should be able to determine:

- What happened (series of events)
- What provoked the incident
- If the procedures in place were correctly followed
- If the intervention measures were appropriate
- If the existing safety procedures were adequate
- If the lines of communication were effective
- If other preventative measures should be implemented
- If the situation could have been prevented

6.76.11 In conjunction with any discipline that may be imposed, the Board may reassign an employee during or after the Board's investigation, as deemed reasonable under the circumstances.

7.0 Communicating the Results of an Investigation

7.1 The results of the investigation will be communicated to the person who reported the circumstances and to others involved in the investigation that reasonably ought to be informed of the results.

7.2 The results of the investigation and any report created in the course of or for the purpose of the investigation is not considered a report relating to occupational health and safety, for the purposes of subsection 25(2) of the OHSA.

8.0 Training and Education

8.1 All employees must complete Workplace Violence Prevention Training annually.

8.2 New employees must complete training during onboarding. Training includes:

- 8.2.1 Recognizing warning signs;
- 8.2.2 Strategies for de-escalation;
- 8.2.3 Reporting and response protocols;
- 8.2.4 Legal rights and responsibilities under the OHSA and Education Act.

9.0 Confidentiality and Protection from Reprisal

9.1 Confidentiality of all parties involved in a report or investigation must be maintained, except where disclosure is necessary for investigation or corrective action.

9.2 Retaliation against any individual who reports workplace violence in good faith is strictly prohibited.

11.0 Corrective Actions

11.1 In the case where the perpetrator of a violent incident is a staff member, corrective measures may include:

- 11.1.1 Verbal/written warnings;
- 11.1.2 Mandatory training or counseling;
- 11.1.3 Reassignment or modification of duties;
- 11.1.4 Disciplinary action up to and including termination;
- 11.1.5 Reporting to police when applicable.

**REPORT TO THE BRANT HALDIMAND NORFOLK
CATHOLIC DISTRICT SCHOOL BOARD POLICY
COMMITTEE**

Prepared by: Kevin Greco, Superintendent of Education
Presented to: Policy Committee
Submitted on: June 10, 2025
Submitted by: Mike McDonald, Director of Education & Secretary

Workplace Harassment #300.01

BACKGROUND INFORMATION:

The Brant Haldimand Norfolk Catholic District School Board (the “Board”) recognizes the inherent right of all individuals to be treated with dignity and respect. As a Catholic Learning Community, the Board believes that all of its employees should work and learn in a respectful, non-threatening environment that is free from harassment in all of its forms and from all sources, including but not limited to employees, supervisors, parents, visitors, members of the public and any other individuals who come into contact with employees of the Board.

The Board has specific duties regarding Workplace Harassment and Workplace Sexual Harassment under the *Ontario Human Rights Code and the Occupational Health and Safety Act*.

DEVELOPMENTS:

This Policy and Administrative Procedure has been updated with definitions from the Ontario *Human Rights Code and the Occupational Health and Safety Act* for: prohibited grounds, discrimination, and supervisor.

This Policy and Administrative Procedure includes measures for all employees to be educated on harassment in the workplace and the Board’s responsibilities related to harassment, identified in terms of awareness, prevention and response.

Revisions also include a more clearly defined three step procedural response to harassment complaints and more accurately defines the appeal process as a review of the procedural steps of the investigation.

RECOMMENDATION:

THAT the Policy Committee recommends that the Committee of the Whole refers Policy and Administrative Procedure 300.01 Workplace Harassment to the Brant Haldimand Norfolk Catholic District School Board for approval.



Workplace Harassment

#300.01

Adopted:	April 23, 2002
Last Reviewed/Revised:	June, 2025
Responsibility:	Superintendent of Business Education
Next Scheduled Review:	November 1, 2029

POLICY STATEMENT:

The Brant Haldimand Norfolk Catholic District School Board (the "Board") recognizes that the inherent right of all individuals to be treated with dignity and respect is central to Catholic values and beliefs and supports a safe and nurturing environment for all staff and students. As a Catholic Learning Community, the Board believes that all of its employees should work and learn in a respectful, non-threatening environment that is free from harassment in all of its forms and from all sources, including but not limited to employees, supervisors, parents, visitors, members of the public and any other individuals who come into contact with employees of the Board.

APPLICATION AND SCOPE:

The Board has specific duties regarding Workplace Harassment and Workplace Sexual Harassment under the Ontario *Human Rights Code and Occupational Health and Safety Act*. ~~This Policy and Administrative Procedure clarifies roles and responsibilities regarding workplace harassment, to assist employees with their complaint and to provide direction to school administration, managers and supervisors in receiving and responding to a complaint.~~ (moved up from below)

Employees are encouraged to report workplace harassment. The Board will investigate and ~~deal with~~ address all complaints or incidents of workplace harassment in a fair and timely manner. Information about a complaint or incident will not be disclosed except to the extent necessary to protect employees, to investigate the complaint or incident, to take corrective action or as otherwise required by law.

An employee will not be penalized for reporting an incident or participating in a workplace harassment investigation.

~~If an employee needs assistance, he or she may contact the Joint Health and Safety Committee, their union representative (if applicable), or the Human Rights Legal Support Centre.~~

~~In order to protect its employees, the Board will ensure that:~~

- ~~In consultation with the Joint Health and Safety Committee, the Board will maintain a Workplace Harassment Administrative Procedure to implement this policy as required under clause 32.0.1(1)(b), of the Occupational Health and Safety Act. In procedure section~~

This Policy and Administrative Procedure includes measures for:

- a working environment that is free from harassment-
- all employees to be educated on harassment in the workplace, to ensure an understanding of the importance of the policy and to be made aware that harassment is not acceptable and will not be tolerated.
- all those working for the Board, and those using the services of the Board, to be informed that harassment in the workplace or in the provision of services (i.e., educational and other) may be an offence under the law.



- employees to be made aware of the types of behaviour that may be considered harassment.
- the Board's responsibilities relative to harassment, identified in terms of awareness, prevention and response.
- an impartial external investigator to receive and investigate a report of workplace harassment, if the alleged respondent(s) are in a position of authority or perceived authority.

REFERENCES:

- Education Act
- Ontario Human Rights Code
- Criminal Code of Canada
- Canadian Charter of Rights and Freedoms
- Occupational Health and Safety Act
- Board Policy 300.12 Volunteers
- Board Policy 300.16 Health and Safety
- Board Policy 300.20 Workplace Violence Prevention

FORMS:

- **Form 1 - Brant Haldimand Norfolk Catholic District School Board's Workplace Harassment Complaint Form**

APPENDICES:

- **N/A**

DEFINITIONS:

Complainant: A person who considers that they have been subjected to harassment or harassment related reprisal even though that individual may not lay a formal written complaint.

Disability: A person that has or has had, or is believed to have or have had:

- any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device;
- a condition of mental impairment or a developmental disability;
- a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- a mental disorder; or,
- an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

Discrimination: The Ontario Human Rights Code states that "Every person who is an employee has a right to freedom from harassment in the workplace by the employer or agent of the employer or by another employee because of race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sexual orientation, gender identity, gender expression, age, record of offences, marital status, family status or disability."



Harassment: The *Ontario Human Rights Code* defines Harassment as “engaging in a course of vexatious comment or conduct against a worker, in a workplace, that is known, or ought reasonably to be known to be unwelcome”. This includes among other things, disparaging comments (i.e., inappropriate gender-related comments), distribution of discriminatory materials, behaviour intended to incite hatred or other verbal or physical conduct of a nature, which is known or ought reasonably to be known to be unwelcome, or where such conduct involves any of the prohibited grounds of discrimination as defined by the *Ontario Human Rights Code*.

Investigator: An Investigator may include a member of Human Resource Services, a Superintendent of Education, the Superintendent of Business, the Director of Education, or an external investigator.

Prohibited Grounds: Under the Ontario Human Rights Code (OHRC), prohibited grounds refer to the personal characteristics that are legally protected from discrimination and harassment in areas such as employment, housing, services, and contracts. The prohibited grounds of discrimination are:

1. Age
2. Ancestry
3. Colour
4. Race
5. Citizenship
6. Ethnic origin
7. Place of origin
8. Creed
9. Disability
10. Family Status
11. Marital status
12. Gender identity
13. Gender expression
14. Receipt of Public Assistance
15. Record of offences (in employment - a conviction for an offence under provincial law or a conviction under the *Criminal Code* for which a pardon has been granted and not revoked)
16. Sexual orientation
17. Sex

Reprisal: A reprisal is an action, or threat, that is intended as retaliation for claiming or enforcing a right under the Ontario Human Rights Code or the Occupational Health and Safety Act.

Respondent: A person who is alleged to have engaged in workplace harassment as defined in *Definitions* of the Workplace Harassment Policy.

Sexual Solicitation or Advances: Section 7(3)(a) of the *Ontario Human Rights Code* sets out a person's right to be free from a sexual solicitation or advance made by a person in a position to confer, grant or deny a benefit or advancement to the person where the person making the solicitation or advance knows or ought reasonably to know that it is unwelcome. This provision of the *Ontario Human Rights Code* is violated when the person making the solicitation or advance knows, or should reasonably know, that such behaviour is unwelcome.

Supervisors: The Occupational Health and Safety Act defines a supervisor as a person who has charge of a workplace or authority over a worker.

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, including virtually



through the use of information and communications technology, that is known or ought reasonably to be known to be unwelcome. The definition of workplace harassment includes workplace sexual harassment.

Behaviours that may be considered workplace harassment include:

- bullying;
- teasing;
- intimidating or offensive jokes or innuendos;
- displaying or circulating offensive pictures or materials;
- offensive or intimidating telephone calls, email or text messages.

Workplace harassment is broad enough to include what is often called psychological harassment or personal harassment.

Reasonable action taken by an employer or supervisor relating to the management and direction of a worker or the workplace is not workplace harassment.

Workplace Sexual Harassment: The *Occupational Health and Safety Act* defines workplace sexual harassment as:

- Engaging in a course of vexatious comment or conduct against a worker in the workplace, including virtually through the use of information and communications technology, because of sex, sexual orientation, gender identify or gender expression, where the course of comment or conduct is known, or ought reasonably to be known, to be unwelcome; or
- Making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.

~~**Workplace Harassment:** Any alleged behaviour that appears to meet the definition of harassment, workplace harassment or sexual harassment found in the *Definitions of the Workplace Harassment Policy*.~~

Carol Luciani, Chair of the Board

Date

ADMINISTRATIVE PROCEDURES:

1.0 Purpose:

- 1.1 The Board has a legal, ethical and moral responsibility to investigate allegations of workplace harassment. This policy applies to and addresses workplace harassment from all sources, including but not limited to employees, supervisors, parents, visitors, members of the public and any other individuals who come into contact with employees of the Board during the course of employment.

2.0 Responsibilities:

- 2.1 ~~The School Board Administration of the Board~~ is responsible for:



- discouraging and preventing employment-related harassment and harassment in the provision of services;
- ~~providing awareness of~~ **promoting** the Board's commitment to providing a harassment-free environment and the existence of the procedures available under the Policy;
- ensuring that an investigation is conducted into incidents and complaints of workplace harassment that is appropriate in the circumstances;
- ensuring that the employee who has allegedly experienced workplace harassment (the "Complainant") and the alleged harasser (the "Respondent"), if he or she is an employee of the Board, are informed in writing of the results of the investigation and of any corrective action that has been taken or that will be taken as a result of the investigation;
- imposing appropriate remedial and preventive measures, which may include discipline up to and including dismissal of an employee(s) when a complaint of harassment is found to have been substantiated;
- providing appropriate procedural assistance and response to a Complainant(s), as well as to Respondent(s);
- formally acknowledging to a person found to have been harassed that harassment has taken place and to provide them with support and assistance as appropriate;
- formally acknowledging to a person who has been named as a harasser if harassment is not found to have taken place;
- regularly reviewing the Workplace Harassment **Policy and Administrative Procedure** ~~to ensure alignment with the Workplace Harassment Policy;~~
- maintaining confidential records as required;
- providing training and resources for all those working for and providing services to the Board to fulfill their responsibilities under the Workplace Harassment Policy; and
- ~~completing~~ **providing** any additional training related to harassment in the workplace as required by the Board or through changes in legislation.

2.2 Employees are responsible for:

- promoting a working and learning environment that is free from harassment and assisting anyone who believes they are being or may have been harassed;
- notifying the supervisor or principal if they believe that a colleague or another person employed by the Board has been the victim of harassment; and
- completing the mandatory *Violence and Harassment in the Workplace* online training module within one month of date of hire.

3.0 Workplace Harassment

3.1 The Ontario *Human Rights Code* requires that employers have procedures to prevent and respond to allegations of harassment or discrimination. The *Occupational Health and Safety Act* has been amended to include workplace harassment (including sexual harassment) as a hazard for which employers must develop prevention and response strategies. These procedures support the legislated requirements and the Board's commitment to providing a safe working environment.

3.2 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 that is known or ought reasonably to be known to be unwelcome or workplace sexual harassment. Harassment may also be a form of discrimination if based on one of the Prohibited Grounds as outlined in the Ontario *Human Rights Code*.

3.3 Types of behaviour which may constitute harassment include, but are not limited to:

- jokes causing embarrassment or offence, told or carried out after the person telling the jokes has been advised that they are offensive, or that are by their nature clearly embarrassing or offensive;



- racial epithets; **homophobic, sexist or ethnic slurs**
- mimicking of person's accent or pronunciation of words;
- comments ridiculing individuals because of race-related characteristics or religious dress;
- the display of offensive material and graffiti (including electronic format, fax or voice mail);
- the display of symbols or emblems, including dress, that indicates or incites hatred or notions of supremacy;
- degrading words used to describe a person;
- derogatory remarks directed towards members of a group protected under the Ontario *Human Rights Code*;
- verbal and non-verbal abuse, intimidation or threats.
- **Abuse of authority which undermines performance or threatens career**

3.4 Types of behaviour associated with sexual harassment include, but are not limited to:

- leering (prolonged and intense staring);
- sexually suggestive or obscene comments or gestures;
- unwelcome sexual flirtations, advances, propositions;
- sexual solicitation or advance from a person in a position to confer, grant or deny a benefit;
- unwanted gifts;
- unwanted and persistent requests for dates;
- requests for sexual favors;
- unwanted touching;
- verbal abuse or threats of a sexual nature;
- bragging about sexual prowess;
- questions or discussions about sexual activities;
- stalking;
- gender-based remarks about a person's physical appearance or behaviour;
- persistent unwanted contact or attention after the end of a consensual relationship;
- sexual assault;
- any comments, gestures or above-identified behaviour in relation to sexual orientation or gender identity
- reprisal or threat of reprisal for rejection of a sexual solicitation or advance made by a person in a position to confer, grant or deny a benefit.

3.5 Other Types of Harassment:

- 3.5.1 **Poisoned Work Environment:** The notion/concept of a poisoned environment is one which is created when a workplace is hostile or unwelcoming because of insulting or degrading comments or offensive actions aimed at an employee or others within the workplace. Negative comments or conduct which humiliates, demeans, **ostracizes** and is devaluing of members of groups targeted by the unwelcome behaviour can be considered to poison a work environment.
- 3.5.2 **Parental and Community Member Harassment:** Harassment may be understood as persistent parental or community criticism of, or interference with, school programs or teacher performance or a course of interaction that is vexatious, unwarranted or unsubstantiated. Parental harassment does not include the normal interaction of parents with school staff regarding their children. A staff member who believes they have been subjected to harassment by a parent **or community member** should follow the procedures for reporting workplace harassment as outlined in this Administrative Procedure.

3.6 What is not Harassment: A reasonable action taken by an employer or supervisor relating to the management and direction of workers or the workplace is not workplace harassment.



3.7 Harassment or discrimination involving a student of the Board will be addressed under the *Safe Schools Act* and should be reported to the appropriate School or Board Administration.

4.0 Reporting Workplace Harassment

4.1 Any employee of the Board has the right to file a complaint about situations which they believe to be discriminatory or harassing behaviour, whether they are directly involved as the victim of the behaviour or have observed the behaviour exercised against another or others.

4.2 Employees can report incidents or complaints of workplace harassment **and/or discrimination** verbally or in writing.

4.3 When submitting a written complaint, the Complainant ~~may~~ **should** provide the details of their complaint in writing or by completing the *Brant Haldimand Norfolk Catholic District School Board's Workplace Harassment Complaint Form* (Form 1). **Employees can provide additional documentation with the form.**

4.4 If submitting a written complaint outside of the prescribed form, employees will include the following:

- Name of the Complainant(s) and contact information;
- Name of the Respondent(s), position and contact information (if known);
- Names of the witness(es) (if any) or other person(s) with relevant information to provide about the incident (if any) and contact information (if known);
- Details of what happened including date(s), frequency and location(s) of the alleged incident(s);
- Any supporting documents the Complainant(s) may have in their possession that are relevant to the complaint; and
- A list of any documents a witness, another person or the Respondent(s) may have in their possession that are relevant to the complaint.

4.5 Completed forms/ written complaints and any supporting documentation should be forwarded in confidence to the Manager of Human Resource **Services** at hrmanager@bhncdsb.ca

4.6 When reporting verbally, the reporting contact, along with the Complainant, will record the necessary information.

5.0 Employee **Complainant Responsibilities: Bringing Forward a Complaint**

5.1 Step 1: Informal Resolution

- i. A Complainant is encouraged to bring the matter to the attention of the Respondent by making direct and clear objection to the **respondent(s)** indicating that the comment or conduct is not acceptable. This may resolve the issue.
- ii. It is important that the Complainant document (note the details of) any communication they have with the Respondent (i.e., what was said, date, time, place, witnesses, etc.).
- iii. Where such an approach is attempted and does not produce a satisfactory result or where the Complainant does not feel able to bring the matter directly to the attention of the Respondent, the Complainant should report the harassment to their direct supervisor.
- iv. **The supervisor will support the complainant and assist in determining the best way to resolve the issue.**
- v. In the case where the Respondent is the Complainant's direct supervisor, the Complainant should report the harassment to the next level of management, **Human Resources Services** or another Board employee who is in a position to provide guidance and assistance with the complaint. This may include another Supervisor, Principal, Manager, Superintendent or Director of Education. **This person will assist in determining the best way to support the complainant and assist them in resolving the issue.**

5.2 Supervisor Responsibilities: Responding to a Complaint

- 5.2.1 Where an allegation of harassment **and/or discrimination** is brought forward by an employee, the Supervisor ~~or Board~~ receiving the receiving the complaint will advise the Complainant of the following:



- the availability of counseling and other support services provided by the Board, such as the Employee and Family Assistance Program (EAP);
- the right to withdraw from any further action in connection with the complaint at any stage. The Complainant should be advised that the Board has a legal obligation to investigate allegations of harassment and may continue to investigate the complaint even if they choose to withdraw from any further action;
- there may be times when the Board is legally required or determines it is necessary to conduct an investigation even if someone does not want to file a formal complaint. In that case, it would be considered an employer-initiated complaint.
- all incidents or complaints of workplace harassment, including identifying information about any individuals involved, shall be kept confidential by all parties involved in an investigation, except to the extent where it is necessary to reveal details in order to protect employees, to investigate the complaint, to take corrective action or otherwise as required by law.
- to follow the same procedures if they have been the subject of any act of reprisal for bringing an instance of discriminatory or harassing conduct to the attention of the Board through these procedures or otherwise.

5.2.2 The Supervisor will consult with Human Resource Services and discuss options for resolution with the Complainant:

- i. Step 2: The Principal/Supervisor (or next higher level of management if the Principal/Supervisor is the Respondent), will assist in resolving the complaint informally. This may include meeting with all parties to discuss the matter, exploring the notion of conflict resolution, mediation or any other options to affect a satisfactory solution. Human Resource Services will assist the supervisor in this process.
- ii. Step 3: Submit a formal written complaint under Policy 300.01. If the Complainant chooses to ~~lay~~ file a formal written complaint, the Complainant should be advised that their complaint will be forwarded to the Manager of Human Resources to initiate the formal investigation process. The supervisor will advise the Complainant that the Respondent is entitled to receive the written complaint submitted information regarding the allegations made against them so that they can respond appropriately.

5.2.3 A complaint should be brought to the attention of the Board within six (6) months of the occurrence of the events which gave rise to the complaint. However, where a reasonable circumstance exists for failing to bring the complaint within six (6) months and the delay would not result in any prejudice to the Respondent, a complaint may be accepted beyond the six (6) month limit.

6.0 Step 2: Informal Resolution: Supervisor Facilitated

6.1 Failing resolution at step one the Principal/Supervisor (or next higher level of management if the Principal/Supervisor is the Respondent), will assist in resolving the complaint informally.

6.2 The Principal/Supervisor will:

- i. Consult with Human Resources Services where assistance is required.
- ii. Meet with the Complainant to gather information and clarify the details of the complaint.
- iii. Meet with the Respondent(s)
- iv. Meet with any identified witnesses to corroborate information.
- v. Inquire in any other ways to gather relevant and necessary information.
- vi. Collaborate with the Complainant on how they would like to proceed to remedy the situation (informal discussion with the Complainant and Respondent (i.e., mediation, conflict resolution, education).

6.3 All parties will be advised that they may be accompanied by a union representative (if applicable). The union representative will be advised that their participation in the investigation is to support the employee through the process.



- 6.4 All parties involved will be advised that confidentiality and professionalism must be maintained by all parties throughout and following the investigation process. Failure to maintain confidentiality may result in disciplinary action.
- 6.5 Comprehensive and confidential notes will be kept by the supervisor/principal.
- 6.6 The principal/supervisor will prepare a written summary for all parties that may include recommendations to restore and maintain the professional relationship.

7.0 Step 3: Formal Complaint

- 7.1 The complaint may proceed to Step 3 in the following circumstances:
- In lieu of Step 1 or Step 2, if it is determined by Human Resource Services that the most appropriate avenue, given the circumstances surrounding the complaint, is to proceed to Step 3 (e.g., if the source of the complaint is the Complainant's Supervisor);
 - If Step 1 and/or Step 2 does not resolve the complaint;
 - In the case of Sexual Harassment.
 - In lieu of Step 1 and/or 2, at the option of the Complainant
- 7.2 Where the Complainant wishes to bring forward a formal written complaint, they may do so by providing the details of their complaint in writing or by completing the *Brant Haldimand Norfolk Catholic District School Board's Workplace Harassment Complaint Form* (Form 1).
- 7.3 Once completed, the complaint, completed form and any supporting documentation should be forwarded in confidence to the Supervisor and the Manager of Human Resource Services at hrmanager@bhncdsb.ca.
- 7.4 Where other board personnel receive the complaint they will inform the Manager of Human Resource Services of the formal written complaint. This should be done within 24 hours of receiving the complaint.
- 7.5 The Manager of Human Resource Services will assign the investigation to the appropriate Board personnel who will conduct an impartial investigation into the complaint. Investigations may be conducted by a member of Human Resource Services, a Superintendent of Education, the Superintendent of Business, the Director of Education or an external investigator, dependent upon the position of the Complainant or Respondent and at the discretion of the Manager of Human Resource Services.
- 7.6 While the investigation is on-going, the Complainant, the Respondent, and any witnesses will be instructed not to discuss the complaint, incident(s) or the investigation with other employees or witnesses unless necessary to obtain advice about their rights.
- 7.7 The investigator may identify in-term measures to be implemented throughout the investigation for the safety and wellbeing of the parties involved.
- 7.8 The assigned Investigator will meet with the Complainant and Respondent individually and will outline the formal complaint process as outlined in the following stages.
- 7.9 The Board recognizes that anonymous complaints are difficult to investigate while still providing procedural fairness. Available options may be limited.

8.0 Formal Complaint Investigation Procedure

8.1 Stage 1: Documentation and Notification Process

- 8.1.1 The Investigator will advise the Complainant of their right to take other avenues of recourse such as:
- utilizing any applicable provisions of the Collective Agreement;
 - filing a complaint with the Ontario Human Rights Commission;
 - filing a complaint with the Ministry of Labour;
 - resolving the issue through federation/union mechanism if both Complainant and Respondent are members of the same bargaining unit;
 - taking civil action;
 - reporting the incident to the police and taking action under the *Criminal Code*.



- 8.1.2 The Investigator will advise the Complainant that the Respondent is entitled to receive information regarding the allegations made against them so that they can respond accordingly.
- 8.1.3 Both parties will be advised that even if the matter is resolved to the satisfaction of the Complainant, the Board is obliged under the *Occupational Health and Safety Act* and the Ontario *Human Rights Code* to continue the inquiry into the complaint and to take whatever remedial action is appropriate.

8.2 Stage 2: Investigation

- 8.2.1 The assigned Investigator will collect evidence by meeting with the Complainant and Respondent (separately), interview witnesses and otherwise investigate all aspects of the matter that are relevant in determining whether or not the allegations of harassment are substantiated.
- 8.2.2 All individuals who are interviewed will be advised that they may be accompanied by a union representative (if applicable). The union representative will be advised that their participation in the investigation is to support the employee through the process.
- 8.2.3 All parties involved in the investigation including the Complainant, Respondent and any witnesses will be advised that confidentiality must be maintained by all parties throughout and following the investigation process.
- 8.2.4 Comprehensive, confidential notes will be kept by the Investigator.

8.3 Stage 3: Report and Conclusion

- 8.3.1 At the conclusion of the investigation, the Investigator will prepare a summary of the investigation findings.
- 8.3.2 Both the Complainant and the Respondent will be informed in writing whether the allegations of harassment are substantiated or unsubstantiated.
- 8.3.3 The Investigator will recommend appropriate remedial action which should be taken in the circumstances. It should be noted that remedial action may be recommended regardless if the allegations of harassment are substantiated or unsubstantiated.
- 8.3.4 Such remedial action may include, but not be limited to:
- counseling;
 - education or training related to harassment;
 - formal written apology;
 - change of work assignment of the Complainant and/or Respondent;
 - disciplinary action up to and including dismissal.
- 8.3.5 The Investigator will advise the appropriate Supervisor of the investigation findings in writing, and recommend any disciplinary and/or remedial action to be taken. The Supervisor, in consultation with a member of Senior Administration is responsible for determining the level of disciplinary action and/or remedial action to be taken, based on the investigative findings.

8.4 Stage 4: ~~Appeal~~ Review of the Decision

- ~~8.4.1~~ The Complainant and/or Respondent may ~~appeal~~ request a review of the decision investigation process to the Director of Education within 10 days of the receipt of the investigation findings. The Director will conduct a review of the ~~investigative findings and determine~~ investigation to determine whether:
- i. the investigators failed to comply with these procedures;
 - ii. new relevant evidence becomes known after the final decision and before the expiry of the ten working days.
- ~~8.4.18~~ 8.4.2 This process does not include a review of the final decision regarding a claim that the conclusions drawn by the investigator(s) were incorrect.
- ~~8.4.28~~ 8.4.3 Based on the appeal review, the Director may recommend an additional investigation be conducted either by another Investigator employed by the Board or by an external investigator.



8.5 Retention of Records

8.5.1 Records of the investigation will include:

- a. a copy of the complaint or details about the incident;
- b. a record of the investigation including notes;
- c. a copy of witness statements, if taken;
- d. a copy of the investigation report;
- e. a summary of the results of the investigation that was provided to the Complainant and to the Respondent, if an employee of the Board;
- f. a record of any corrective action taken to address the complaint or incident of workplace harassment;
- g. a copy of any appeal related records;
- h. a copy of any corrective action taken to address the complaint or incident of workplace harassment.

8.6 All documentation collected during the formal process must be kept confidential and maintained in a filing system in accordance with the Municipal Freedom of Information and Protection of Privacy Act. All written documents must be kept in a sealed envelope and stored in the office of the Manager of Human Resources.

8.7 The results of an investigation, and any report created in the course of, or for the purposes of the investigation, are not a report respecting occupational health and safety for the purposes of subsection 25(2) in the Occupational Health and Safety Act, and therefore are not required to be shared with the Joint Health and Safety Committee.

8.8 For the purposes of the Occupational Health and Safety Act, records must be kept for at least one year from the conclusion of the investigation.

9.0 Reprisal

9.1 The Ontario *Human Rights Code* (Section 8) and the *Occupational Health and Safety Act* (Section 50), require that employers protect employees from reprisal or threats of reprisal. A reprisal is an action, or threat, that is intended as retaliation for claiming or enforcing a right under the *Code*.

9.2 Employees who file a complaint under the Workplace Harassment policy or who are involved in an investigation related to Workplace Harassment will be protected against reprisal and retaliation.

9.3 Under the Ontario *Human Rights Code* and the *Occupational Health and Safety Act*, reprisal against an individual will be treated as harassment when such actions occur, for;
a) having invoked the Policy (whether on behalf of oneself or another individual);
b) having participated or cooperated in an inquiry or investigation process under the Policy; or
c) having associated with a person who has invoked the Policy or participated in these Administrative Procedures.

9.4 In the event that an employee is shown to have not acted in good faith and has initiated a complaint under the Workplace Harassment policy in a frivolous or malicious manner, the Board may take formal disciplinary action against the Complainant. Such discipline is not considered reprisal or a breach of this policy. Documentation regarding the disciplinary action will be placed in the employee's personnel file.

10.0 Consequences of Engaging in Harassment

10.1 Under Statute



- 10.1.1 Persons who engage in harassment prohibited by the Ontario *Human Rights Code* are liable under the *Code* for damages payable to the Complainant. In addition, a person who violates the *Code* or who obstructs a Human Rights investigation may also be liable to prosecution under the *Code* and, on conviction, subject to a monetary fine as determined by the Ontario Human Rights Commission.
- 10.1.2 Persons who engage in workplace harassment prohibited by the *Occupational Health and Safety Act* are liable for disciplinary action up to and including dismissal.
- 10.1.3 Persons who have knowledge of, or who acquiesce in harassment may be found in violation of the *Ontario Human Rights Code*, or the *Occupational Health and Safety Act*, as having indirectly engaged in prohibited activity and are subject to the same consequences as those who directly engage in discrimination or harassment.

10.2 At Common Law

- 10.2.1 Persons who engage in harassment or discrimination, directly or indirectly, may be sued.

10.3 In Employment

- 10.3.1 Employees who engage, directly or indirectly, in discrimination or harassment may be disciplined up to and including dismissal.

11.0 Confidentiality

- 11.1 The Board understands that it is difficult to come forward with a complaint of harassment and recognizes a Complainant's interest in keeping the matter confidential.
- 11.2 To protect the interests of the Complainant, the Respondent and any others who may report incidents of harassment, confidentiality will be maintained throughout the investigation process to the extent practicable and appropriate under the circumstances.

REPORT TO THE BRANT HALDIMAND NORFOLK CATHOLIC DISTRICT SCHOOL BOARD POLICY COMMITTEE

Prepared by: Kevin Greco, Superintendent of Education
Presented to: Policy Committee
Submitted on: June 10, 2025
Submitted by: Mike McDonald, Director of Education & Secretary

Duty to Report #300.23

BACKGROUND INFORMATION:

The Brant Haldimand Norfolk Catholic District School Board ("the Board") is committed to fostering safe and inclusive school communities that promote and support student well-being and achievement. The Board believes all staff have an obligation to contribute to building a culture of care and are equipped to respond to safety risks, including their duty to report any child in need of protection to the local Child and Family Services (CFS).

The duty to report a child in need of protection to the local Child and Family Services applies to all employees, volunteers, and parents/guardians of the Board. All employees, volunteers, and parents/guardians of the Board are directed to follow the *Joint Child Protection Protocol* at the link in the References section.

Child and Family Services help to protect infants, children and youth who are experiencing abuse or are at risk of experiencing abuse, physically, sexually, emotionally or through neglect or abandonment. Section 125(1) of the *Child, Youth and Family Services Act* (CYFSA) provides direction for reporting a child in need of protection to Child and Family Services. This includes a child that is or may be suffering from abuse or neglect by a caregiver, or by a person having charge of the child. Every person who has reasonable grounds to suspect that a child is "in need of protection" shall immediately report the suspicion and the information upon which it is based to Child and Family Services. The Ontario Ministry of Education's Policy/Program Memorandum No. 9 *Duty to report children in need of protection* further emphasizes this duty, requiring all school staff to be aware of their responsibilities under the CYFSA and ensuring that school board policies conform to the Act's provisions.

DEVELOPMENTS:

This is a NEW Board Policy and Administrative Procedure. It clearly articulates that all staff play an important role in safeguarding the physical and mental health and well-being of children and youth by recognizing, preventing, and responding to children who may be in need of protection. This Policy and Administrative procedure point the reader to detailed staff responsibilities, legal requirements, procedures, child protection protocols, referrals and investigations that are outlined in the Board's *Joint Child Protection Protocol*.

Section 125(1) of the Act confirms that if a person, including a person who performs professional or official duties with respect to children and youth, has reasonable grounds to suspect that a child is, or may be in need of protection, the person shall immediately report the suspicion and the information on which it is based to Child and Family Services. This includes a child that is or may be suffering from all

types of abuse, emotional harm, exploitation, and/or neglect by a caregiver, or by a person having charge of the child. Therefore, teachers, principals, and other professionals in the course of performing their professional duties must report this information without delay to Child and Family Services.

To comply with Erin's Law (Child, Sexual Abuse Prevention and Reporting) this Policy and Administrative Procedure also states that the Board will ensure that important information regarding child sexual abuse prevention and reporting, counselling and resources are available for students, staff, parents and that the Board will ensure that students are annually learning about topics of child sexual abuse prevention and reporting.

RECOMMENDATION:

THAT the Policy Committee recommends that the Committee of the Whole refers Policy and Administrative Procedure #300.23 Duty to Report to the Brant Haldimand Norfolk Catholic District School Board for approval.



Duty to Report

#300.23

Adopted:	March 2025
Last Reviewed/Revised:	NEW
Responsibility:	Superintendent of Education
Next Scheduled Review:	2029

POLICY STATEMENT:

The Brant Haldimand Norfolk Catholic District School Board ("the Board") is committed to fostering safe and inclusive school communities that promote and support student well-being and achievement. The Board believes all staff have an obligation to contribute to building a culture of care and are equipped to respond to safety risks, including their duty to report any child in need of protection to the local Child and Family Services.

APPLICATION AND SCOPE:

The duty to report a child in need of protection to the local Child and Family Services (CFS) applies to all employees, volunteers, and parents/guardians of the Board. All employees, volunteers, and parents/guardians of the Board are directed to follow the *Joint Child Protection Protocol* at the link in the References section.

Child and Family Services help to protect infants, children and youth who are experiencing abuse or are at risk of experiencing abuse, physically, sexually, emotionally or through neglect or abandonment. Section 125(1) of the *Child, Youth and Family Services Act* (CYFSA) provides direction for reporting a child in need of protection to Child and Family Services. This includes a child that is or may be suffering from abuse or neglect by a caregiver, or by a person having charge of the child. Every person who has reasonable grounds to suspect that a child is "in need of protection" shall immediately report the suspicion and the information upon which it is based to Child and Family Services. The Ontario Ministry of Education's Policy/Program Memorandum No. 9 *Duty to report children in need of protection* further emphasizes this duty, requiring all school staff to be aware of their responsibilities under the CYFSA and ensuring that school board policies conform to the Act's provisions.

REFERENCES:

- Child, Youth and Family Services Act (2017) (amended, 2021)
- Policy/Program Memorandum 9, Duty to report children in need of protection
- Erin's Law (Child Sexual Abuse Prevention and Reporting), 2024, S.O. 2024, c. 33 - Bill 123 - An Act to amend the Education Act with respect to child sexual abuse prevention and reporting
- Joint Child Protection Protocol
- BHNCD SB Policy 200.23 Equity and Inclusive Education
- BHNCD SB Policy 200.07 Voluntary Indigenous Self-Identification
- BHNCD SB Policy 200.51 Anti-Human Trafficking
- BHNCD SB Police School Board Protocol



FORMS:

- Report of Reasonably Suspected Child Protection Concern Form – Form 1
- Child and Family Services School Visits Log – Form 2

APPENDICES:

- N/A

DEFINITIONS:

Child and Family Services (CFS): also known as Children's Aid Societies, or Child Welfare Agencies, are government or non-profit organizations that focus on the well-being of children and families, particularly those facing difficult situations, by providing services like child protection, family support, and placement options.

ADMINISTRATIVE PROCEDURES:

1.0 Responsibilities

- 1.1 All staff play an important role in safeguarding the physical and mental health and well-being of children and youth by recognizing, preventing, and responding to children who may be in need of protection.
- 1.2 Detailed staff responsibilities, legal requirements, procedures, child protection protocols, referrals and investigations are outlined in the Board's *Joint Child Protection Protocol*.

2.0 Requirements

- 2.1 Section 125(1) of the Act confirms that if a person, including a person who performs professional or official duties with respect to children and youth, has reasonable grounds to suspect that a child is, or may be in need of protection, the person shall immediately report the suspicion and the information on which it is based to Child and Family Services. This includes a child that is or may be suffering from all types of abuse, emotional harm, exploitation, and/or neglect by a caregiver, or by a person having charge of the child. Therefore, teachers, principals, and other professionals in the course of performing their professional duties must report this information without delay to Child and Family Services.
- 2.2 Upon making a report to the Child and Family Services, the principal and/or school personnel shall record the information including the name of the intake worker and the date and time of the report in the *Report of Reasonably Suspected Child Protection Concern Form (Form 2)*.

3.0 Record of Visits

- 3.1 In cases where the Child and Family Services worker must visit the school as part of an investigation, the principal will make the student and the person who made the report available for an interview in a discrete location.
- 3.2 Upon arrival at school, the investigating CFS Worker shall produce proper identification and complete the *Child and Family Services School Visits Log (Form 1)*.



4.0 Human Trafficking

- 4.1 All school board staff, volunteers and families work together to safeguard the physical and mental health and well-being of children and youth by recognizing, preventing, and responding to human trafficking in culturally sensitive ways.
- 4.2 Staff will identify the warning signs of human trafficking and safely connect those who have been, or are at risk of being trafficked, to the appropriate responsive school and community programs and services. The Board's Anti-Human Sex Trafficking Policy 200.51 guides the ongoing response to students who may be at risk of trafficking.

5.0 Indigenous Peoples

- 5.1 The duty to report extends to all students. However, as members of distinct, self-determining Nations, Indigenous Peoples have the right to be consulted in determining best approaches to the care and response in duty to report scenarios and incidents of human trafficking. The Board recognizes the importance of consultation and outreach with Indigenous rightsholders, in the work to prevent and respond to human trafficking in Indigenous communities.

6.0 Confidentiality

- 6.1 Board staff will respect confidentiality, privacy, and related requirements when they respond to students who are at risk. The Board acknowledges the limits of confidentiality under the law, in particular section 125(1) of the Child, Youth and Family Services Act that requires all adults to immediately report to the local Child and Family Services any reasonable grounds to suspect that a child below the age of 16 is in need of protection, including incidents of human trafficking.

7.0 Ongoing Reporting

- 7.1 Subsection 125(2) of the act states that the duty to report is an ongoing obligation. If a person has made a report about a child to Child and Family Services and has additional reasonable grounds to suspect that the child is or may be in need of protection, that person must make a further report to Child and Family Services.

8.0 Older Children

- 8.1 Subsection 125(4) of the act clarifies that, if the child is 16 or 17 years old, there is no duty to make a report, but there are circumstances where a person may make a report concerning older children as described in paragraphs 1 to 11 of subsection 125(1).

9.0 Consequences of Failure to Report

- 9.1 Subsection 125(5) of the act makes it an offence where a person performing professional or official duties with respect to children fails to report a child who they suspect is or may be in need of protection. Subsection 125(6) expressly identifies teachers, designated early childhood educators, and school principals as such persons. If such professionals obtain information, in the course of performing their professional or official duties, that leads them to suspect that a child is or may be in need of protection, they must report this suspicion. If they do not report the suspicion, they are liable, upon conviction of the offence, to a fine of up to \$5000.



10.0 Protection for Persons Making Reports

- 10.1 The Board supports subsection 125(10) of the Child and Family Services Act which confirms that no action for making a report will be instituted against a person who acts in accordance with the duty to report in section 125, unless the person acts maliciously or without reasonable grounds for the suspicion.

11.0 Erin's Law (Child, Sexual Abuse Prevention and Reporting)

- 11.1 The Board will ensure that information regarding child sexual abuse prevention and reporting, and available counselling and resources for children who are sexually abused, is made available to all students, staff, parents and guardians of students in its schools.
- 11.2 The Board will ensure that students in its schools are engaged annually, in a developmentally appropriate manner, regarding the topics of child sexual abuse prevention and reporting, including age-appropriate techniques to recognize child sexual abuse and telling a trusted adult.



RECORD OF CHILD WELFARE AGENCY SCHOOL VISITS

DATE	TIME IN	CASE WORKER	PURPOSE OF VISIT	TIME OUT	SIGNATURE

PRINCIPAL TO RETAIN THIS RECORD
IN THE CHILD WELFARE AGENCY LOG BOOK FILE
IN A SECURE LOCATION

Retention: E+1 (E = case resolved)

Child Protection Protocol - February 2025

Child and Family Services of Grand Erie, Brant Haldimand Norfolk Catholic DSB, Grand Erie DSB



REPORT OF REASONABLY SUSPECTED CHILD PROTECTION CONCERN FORM

To be used in preparation of making a report to child welfare.

Not all information is required but can be useful.

Child and Family Services of Grand Erie 519-753-8681

Ogwadeni:deo 519-445-1864

Student's Last Name	First Name	Gender	Date of Birth (DD/MM/YYYY)
<input type="text"/>	<input type="text"/>	<input type="radio"/> Female <input type="radio"/> Male <input type="radio"/> Trans/Non-Binary	<input type="text"/>

Date of Report	Time of Report	Grade / Class	Teacher
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

School	School Address	School Telephone
<input type="text"/>	<input type="text"/>	<input type="text"/>

Home Address (Street No. / Apt)	City	Postal Code	Home Telephone
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

Religion or Culture (if known):	Languages Spoken at Home:
<input type="text"/>	<input type="text"/>

Indigenous identity (if known):

Is the student Indigenous? ☐ Yes ☐ No ☐ Unsure

If yes, indicate: ☐ Status ☐ Non-Status ☐ Inuit ☐ Metis

If known, indicate the student's First Nation or other membership/affiliation:

Medical Concerns or Relevant Special Needs

Siblings

Last Name	First Name
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>

Mother / Guardian Last Name	First Name	Business No.	Home or Cell No.
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Father / Guardian Last Name	First Name	Business No.	Home or Cell No.
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>



**Keep your consultation to the minimum.
This report form and any other written records may be subpoenaed in subsequent legal proceedings.**

- What the child said and to whom
- The alleged offender (s) and relationship to the child
- When and where the incident occurred
- Names of any other children who might be involved
- Brief description of easily visible marks or injuries or evidence of neglect

Details of Reasonably Suspected Abuse / Neglect (use an additional form if further space is required)

Person Making the Report :

Last Name

First Name

Position

Name of Child Welfare Agency

Name of the Person to Whom the Information was Reported

Investigation outcome:

Investigation Undertaken? ☐ YES ☐ NO ☐ UNKNOWN

Follow up received? ☐ YES ☐ NO ☐ UNKNOWN

If yes, note date of follow up
in this format DDMMYYYY:

Status of file

Retention: E+1 (E = case resolved)

**Principal / Supervisor
or Designate Signature**

Print Name

Principal to retain this record in Child Welfare Agency Log Book file in a secure location.

Child Protection Protocol - February 2025

Child and Family Services of Grand Erie, Brant Haldimand Norfolk Catholic DSB, Grand Erie DSB

REPORT TO THE BRANT HALDIMAND NORFOLK CATHOLIC DISTRICT SCHOOL BOARD POLICY COMMITTEE

Prepared by: Phil Wilson, Superintendent of Education
Presented to: Policy Committee
Submitted on: June 5, 2025
Submitted by: Michael McDonald, Director of Education & Secretary

Service Animal In School Facilities #200.40 Public Session

BACKGROUND INFORMATION:

The Brant Haldimand Norfolk Catholic District School Board (the “Board”) recognizes the dignity, worth, and inclusive potential of every student as grounded in Catholic values and supported by human rights legislation. Service Dogs may serve as an accommodation to support students with disability-related needs, enabling access to the Ontario curriculum and full participation in school life.

The Service Animals in School Facilities Policy (#200.40) was last reviewed in 2011. Since then, legal and practical understanding of service animals in educational settings has evolved, particularly with the introduction of Policy/Program Memorandum No. 163 and growing awareness around the use of Service Dogs to support students with disabilities including Autism, PTSD, and mobility challenges.

DEVELOPMENTS:

The revised policy reflects a comprehensive update to align with current legal frameworks including the Ontario Human Rights Code, the Accessibility for Ontarians with Disabilities Act (AODA), and PPM 163. Major revisions include:

- Terminology Alignment: The policy has moved away from the term 'Certified Service Dog' and now uses the term 'Service Dog' throughout, aligning with the definitions outlined in the Ontario Human Rights Code (OHRC) and the Accessibility for Ontarians with Disabilities Act (AODA).
- Expanded Scope and Responsibilities: Responsibilities of principals, parents/guardians, students, and Board personnel are explicitly outlined to ensure consistency and accountability in decision-making.
- Procedural Enhancements:
 - Introduction of case conference protocols, training requirements for staff and handlers, and templates for communication with school and transportation communities.
- Exclusion criteria that consider health, safety, and competing rights (e.g., allergies, phobias).
- A detailed process for admitting a Service Dog, including documentation, transition planning, and communication strategies.
- Staff Training Requirements: A significant enhancement in the revised policy is the requirement that all Educational Assistants (EAs), classroom teachers, Special Education Resource Teachers (SERTs), and principals who may be involved with a student supported by a service dog shall receive training on the role, function, and integration of service dogs within the school environment. This training is essential to ensure a safe, consistent, and inclusive educational experience for the student.
- Furthermore, the policy now mandates that a minimum of three Educational Assistants shall be trained and certified as service dog handlers. This ensures uninterrupted support for the student in the event of staff absences or leaves. In schools with fewer than three Educational Assistants, all EAs should be trained, ensuring continuity of care and equitable access to accommodations.

RECOMMENDATION:

THAT the Policy Committee recommends that the Committee of the Whole refers the Service Animals in School Facilities Policy #200.40 to the Brant Haldimand Norfolk Catholic District School Board for approval.



Service Animals in School Facilities

#200.40

Adopted:	June 7, 2011
Last Reviewed/Revised:	June 10, 2025
Responsibility:	Superintendent of Education
Next Scheduled Review:	2029

POLICY STATEMENT:

The Brant Haldimand Norfolk Catholic District School Board believes that all persons are created in God's image and possesses inherent worth and dignity. ~~Every individual has an inherent and immeasurable worth and dignity. Each human life is considered sacred.~~ We are committed to fostering a safe, caring, inclusive, and accepting Catholic ~~providing students with full access to schools in a safe, caring, accepting, and healthy~~ learning environment that enables each student to reach ~~his or her~~ their fullest potential. The use of a ~~Certified~~ Service Dog ~~may be an appropriate accommodation is an intervention strategy that is recognized as an aid~~ to support students with ~~special~~ disability-related needs.

APPLICATION AND SCOPE:

~~It is the policy of the Brant Haldimand Norfolk Catholic District School Board that a student with a disability shall be accommodated in such a way as to enable success while preserving and enhancing the student's personal dignity, self respect and self worth. These accommodations may include use of a Certified Service Dog.~~

~~This policy applies to all students in board-operated schools who may require the support of a Service Dog as an accommodation for a disability, in accordance with the Ontario Human Rights Code, the Education Act, and other applicable legislation.~~

REFERENCES:

- Education Act
- Accessibilities for Ontarians with Disabilities Act, (2005)
- Human Rights Code (Ontario)
- Blind Person's Rights Act
- PPM 163: School Board Policies on Service Animals
- Special Education in Ontario Schools: Kindergarten to Grade 12: ~~A Policy and Resource Guide 2017 (2017)~~
- ~~Individual Education Plan: A Resource Guide 2004~~
- Multi-Year Integrated Accessibility Plan ~~2018-2023 Policy 200.32~~
- ~~Related Board Policies and Procedures (e.g., Transportation, Field Trips, Admission of Students)~~
- ~~Integrated Accessibility Standards — Customer Service Administrative Procedure 200.34~~
- ~~Admission of Students Policy and Administrative Procedure 200.14~~
- Educational Field Trip and Excursions Policy and Administrative Procedure 500.01



- ~~• Nutrition — Creating a Healthy Environment Policy and Administrative Procedure 200.01~~
- ~~• Transportation of Students Policy and Administrative Procedure 400.19~~
- ~~• Volunteers Policy and Administrative Procedure 300.12~~

DEFINITIONS:

Service Dog: A dog trained to assist a person with a disability with daily living tasks and/or accessing the curriculum. Training must be from a school accredited by the International Guide Dog Federation or Assistance Dogs International.

Handler: The individual with the disability (typically the student) who manages the Service Dog.

Support Person: A trained adult who may be required to assist in handling the dog if the student is unable.

Competing Rights: Situations where the rights of one individual (e.g., use of a Service Dog) may affect the rights of others (e.g., severe allergies).

Adult Student: A student who is 18 years or older, or 16 or 17 years of age who has removed themselves from the care and control of their parent/guardian.

Certified Service Dogs¹: This refers to three recognized categories of trained dogs used to accommodate the special needs of some students. These include:

- a) **Guide Dogs:** for persons who are visually impaired (blind/low vision)
- b) **Hearing Dogs:** for persons who are hearing impaired (deaf/hard of hearing)
- c) **Service Dogs:** for persons with disabilities (students using wheelchairs, students with Autism, students with Multiple Sclerosis, seizure disorder or Post-Traumatic Stress Disorder (PTSD))

A Certified Service Dog is a working dog and does not interact with employees or other students. The dog will generally have a black leather Special Skills Dog (SSD) harness and leash and saddlebag/or vest.

Handler: The dog handler for the purpose of the Board's policy, regulation and administrative procedure is the student with the disability-related needs for whom the Certified Service Dog is performing services and who is managing and responsible for the Certified Service Dog's performance of those services. It is the expectation of the Board that students utilizing a Certified Service Dog will be the dog's Handler.

¹ For the purposes of the Board's policy and administrative procedure, includes service dogs whose training schools are members and accredited with either the International Guide Dog Federation or Assistance Dogs International and who are handled by a student with a disability who receives the dog's services to assist with daily living activities and/or access to the Ontario curriculum

¹ For the purposes of the Board's policy and administrative procedure, a Service Dog refers to a dog trained by an organization accredited by the International Guide Dog Federation or Assistance Dogs International, used to support a student with a disability in performing daily living tasks and/or in accessing the Ontario curriculum. Where the student cannot independently manage the dog, a trained adult may assist as a support person.



Service Animals in School Facilities

#200.40

Adopted:	June 7, 2011
Last Reviewed/Revised:	
Responsibility:	Superintendent of Education
Next Scheduled Review:	

The Brant Haldimand Norfolk Catholic District School Board believes that all persons are created in God's image and possesses inherent worth and dignity. ~~Every individual has an inherent and immeasurable worth and dignity. Each human life is considered sacred.~~ We are committed to fostering a safe, caring, inclusive, and accepting Catholic ~~providing students with full access to schools in a safe, caring, accepting, and healthy~~ learning environment that enables each student to reach ~~his or her~~ their fullest potential. The use of a ~~Certified~~ Service Dog may be an appropriate accommodation ~~is an intervention strategy that is recognized as an aid~~ to support students with ~~special disability-related~~ needs.

APPLICATION AND SCOPE:

~~It is the policy of the Brant Haldimand Norfolk Catholic District School Board that a student with a disability shall be accommodated in such a way as to enable success while preserving and enhancing the student's personal dignity, self-respect and self-worth. These accommodations may include use of a Certified Service Dog.~~

~~This policy applies to all students in board-operated schools who may require the support of a Service Dog as an accommodation for a disability, in accordance with the Ontario Human Rights Code, the Education Act, and other applicable legislation.~~

REFERENCES:

- Education Act
- Accessibilities for Ontarians with Disabilities Act, (2005)
- Human Rights Code (Ontario)
- Blind Person's Rights Act
- PPM 163: School Board Policies on Service Animals
- Special Education in Ontario Schools: Kindergarten to Grade 12: ~~A Policy and Resource Guide 2017 (2017)~~
- ~~Individual Education Plan: A Resource Guide 2004~~
- Multi-Year Integrated Accessibility Plan ~~2018-2023 Policy 200.32~~
- Related Board Policies and Procedures (e.g., Transportation, Field Trips, Admission of Students)
- ~~Integrated Accessibility Standards – Customer Service Administrative Procedure 200.34~~
- ~~Admission of Students Policy and Administrative Procedure 200.14~~
- ~~Educational Field Trip and Excursions Policy and Administrative Procedure 500.01~~
- ~~Nutrition – Creating a Healthy Environment Policy and Administrative Procedure 200.01~~
- ~~Transportation of Students Policy and Administrative Procedure 400.19~~
- Volunteers Policy and Administrative Procedure 300.12



APPENDICES:

- Appendix A – Information for Parents/Guardians Requesting a ~~Certified~~ Service Dog in the School
- Appendix B – Request for ~~Certified~~ Service Dog Involvement with a Student
- Appendix C – Administrative Checklist for Implementation of a ~~Certified~~ Service Dog in a School Environment
- Appendix D – Management Plan for the Care of the ~~Certified~~ Service Dog
- Appendix E – Sample Letter to School Community
- Appendix F – Sample Letter to the Families of Children in the Class(es)
- Appendix G – Sample Letter to those Sharing Transportation

DEFINITIONS:

Service Dog: A dog trained to assist a person with a disability with daily living tasks and/or accessing the curriculum. Training must be from a school accredited by the International Guide Dog Federation or Assistance Dogs International.

Handler: The individual with the disability (typically the student) who manages the Service Dog.

Support Person: A trained adult who may be required to assist in handling the dog if the student is unable.

Competing Rights: Situations where the rights of one individual (e.g., use of a Service Dog) may affect the rights of others (e.g., severe allergies).

Adult Student: A student who is 18 years or older, or 16 or 17 years of age who has removed themselves from the care and control of their parent/guardian.

Certified Service Dogs¹: This refers to three recognized categories of trained dogs used to accommodate the special needs of some students. These include:

d) Guide Dogs: for persons who are visually impaired (blind/low vision)

e) Hearing Dogs: for persons who are hearing impaired (deaf/hard of hearing)

f) Service Dogs: for persons with disabilities (students using wheelchairs, students with Autism, students with Multiple Sclerosis, seizure disorder or Post Traumatic Stress Disorder (PTSD))

A Certified Service Dog is a working dog and does not interact with employees or other students. The dog will generally have a black leather Special Skills Dog (SSD) harness and leash and saddlebag/or vest.

Handler: The dog handler for the purpose of the Board's policy, regulation and administrative procedure is the student with the disability-related needs for whom the Certified Service Dog is performing services and who is managing and responsible for the Certified Service Dog's performance of those services. It is the expectation of the Board that students utilizing a Certified Service Dog will be the dog's Handler.



ADMINISTRATIVE PROCEDURES:

Purpose

To provide direction for school administrators in supporting the admission and integration of a Service Dog in schools as a disability-related accommodation.¹

~~The Brant Haldimand Norfolk Catholic District School Board believes that as a Catholic learning community, we need to provide safe, nurturing and inclusive environments for learning, working and growing. The purpose of the Administrative Procedure is to provide direction to school administrators regarding the accommodation process for students desiring to use their Certified Service Dogs while attending school.¹~~

Responsibilities

Superintendent of Education: ~~The Superintendent of Education will Oversees~~ implemention the policy and administrative procedure board wide.

Principal/Vice-Principal and/or Designate: ~~Coordinates request and integration process. Principals are to ensure that the procedures are followed and appropriate forms are completed and on file and that all staff, students and others are properly~~

¹ ~~For the purposes of the Board's policy and administrative procedure, includes service dogs whose training schools are members and accredited with either the International Guide Dog Federation or Assistance Dogs International and who are handled by a student with a disability who receives the dog's services to assist with daily living activities and/or access to the Ontario curriculum~~

¹ For the purposes of the Board's policy and administrative procedure, a Service Dog refers to a dog trained by an organization accredited by the International Guide Dog Federation or Assistance Dogs International, used to support a student with a disability in performing daily living tasks and/or in accessing the Ontario curriculum. Where the student cannot independently manage the dog, a trained adult may assist as a support person

~~trained on how to interact with the student who is accompanied by the Certified Service Dog.~~

School Staff: ~~School staff will implement the Service Animals in School Facilities administrative procedure in their schools. Support inclusive practices and implement procedures.~~

Parents/Guardians: ~~Parents/Guardians will follow the Service Animals in School Facilities administrative procedure. Submit required documentation, comply with policy and support dog care.~~

Student: ~~Students will follow the Service Animals in School Facilities administrative procedure. Participate in the care and management of the Service Dog as appropriate.~~

Information

The Ontario Human Rights Code and the Accessibility for Ontarians with Disabilities Act (AODA) provide the legal foundation for students with disabilities to receive appropriate accommodations, which may include the use of a service animal. While school buildings are not considered public spaces under the Education Act, the Brant Haldimand Norfolk Catholic District School Board recognizes that service animals may be a necessary accommodation to support a student's access to the Ontario curriculum and participation in school activities. In accordance with Policy/Program Memorandum No. 163 (2019), the Board will consider requests for service animals on a case-by-case basis, taking into account the duty to



accommodate to the point of undue hardship.

A service animal is one that is individually trained to perform tasks that support a student's disability-related needs. The student (or their parent/guardian) may be asked to provide documentation confirming the animal's training and how it assists with the student's functional needs at school. While emotional support animals and therapy animals are not recognized as service animals under current Ontario law, the Board may consider such requests where there is clear evidence of a demonstrated disability-related need and when no other accommodation is appropriate.

Parents/guardians considering a service animal for their child are encouraged to meet with the school principal, the Student Achievement Leader of Special Education, and the Superintendent of Special Education to explore options and review the required process before making any formal commitments.

~~The Human Rights Code, the Blind Persons' Rights Act and the Accessibility for Ontarians with Disabilities Act (2001) provide authority for Certified Service Dogs to accompany their handlers in all public places and spaces accessible to third parties. **School buildings are NOT public spaces pursuant to the Education Act.** Nevertheless Certified Service Dogs can be recognized as an accommodation strategy² that aids the Handler (student with special needs) to access the Ontario Curriculum or perform daily living activities. Certified Service Dogs and their Handlers receive specialized training to work together and consequently they are trained to present minimal risk and impact on other people and their environment. As a result, access by the Certified Service Dog to the school attended by the Handler may be facilitated pursuant to this procedure.~~

~~The access of Certified Service Dogs, for the benefit of a student, will be considered by the Brant Haldimand Norfolk Catholic District School Board in accordance with the duty to accommodate the disability-related needs of that student to the point of undue hardship in accordance with the Human Rights Code. When a Certified Service Dog is being considered by a family as an accommodation for their child, the parent/guardian may wish to consider meeting with the school principal, Student Achievement Lead: Special Education and the Superintendent of Education, Special Education prior to making a commitment to receive a dog.~~

~~**Companion Dogs and Service Animals**, for the purpose of the Board's policy, regulation and administrative procedure, include animals that provide comfort and friendship to students who may have emotional, self-esteem or social problems. However, their assistance is generally not required to enable a student to access the Ontario curriculum. While these~~

¹ ~~If an individual with a Certified Service Dog wishes to visit a school, he/she must provide ample notice of this visit so the principal can ensure the Certified Service Dog's presence will cause no undue hardship to others. Visitors on board property who require the use of a Certified Service Dog must ensure the dog wears the distinctive harness/saddlebag or vest. The Certified Service Dog must also be on a leash at all times and accompanied by the handler. For further information, please refer to the Board's customer service policy and procedure pursuant to the Accessibility for Ontarians with Disabilities Act (2001).~~

² ~~Accommodations refer to special teaching and assessment strategies, human supports, and/or individualized equipment required to enable a student to learn and demonstrate learning (Special~~



~~Education in Ontario Schools Kindergarten to Grade 12: A Policy and Resource Guide, 2017 p.G1)~~
~~animals may have training, the student they serve may not be the Handler and the student and the animal do not have the same training that a Certified Service Dog and its handler receive.~~

~~As a result, requests for the use of Companion Dogs and Service Animals will only be considered as a last resort to accommodate the student's demonstrated disability related needs.~~

~~Therapy Dogs do not provide services to students while they are attending school.~~

~~Training and Registration~~

~~Procedure~~

Both the ~~Certified~~ Service Dog and the Handler must receive training to ensure that the dog provides the Handler with accommodation services in an appropriate manner irrespective of the environment.

~~A Certified Service Dog and the dog's Handler must be trained and the dog must be registered certified by an accredited provider. in Canada. Training schools for Certified Service Dogs in Ontario must be members and accredited.. by either:~~

- ~~a) The International Guide Dog Federation, whose purpose is to serve the visually impaired and blind people from around the world by training and providing Guide Dogs or;~~
- ~~b) Assistance Dogs International Inc. which is a coalition of not-for-profit organizations that train and place Assistance Dogs.~~

~~Certified~~ Service Dogs ~~are may be~~ given to students with disabilities including: Physical, Blind or Low Vision, Deaf/Hearing Impaired, Autism Spectrum Disorder, Post-traumatic Stress Disorder or a seizure disorder.

~~Initiating Admittance and Integration of a Certified Service Dog~~

~~Initiating the Process~~

- ~~Parents/guardians submit a formal written request to the school outlining the purpose and benefits of having a Service Dog attend the school with their child, including details how the Service Dog will accommodate the student's demonstrated disability related needs.~~
- ~~A case conference is convened to review documentation, including:~~
 - ~~Letter from a regulated health professional recommending the Service Dog.~~
 - ~~Proof of training and certification from an accredited provider.~~
 - ~~Annual proof of up-to-date vaccinations, municipal license, and insurance.~~
- ~~The admittance of a Service Dog in school is determined on a case-by-case basis through a thorough consultation process. When a parent requests the use of a dog, the principal must first confirm it is a Service Dog and consult with the Superintendent of Education: Special Education. Decisions consider the specific needs of the student and, when necessary, balance the rights and needs of all individuals involved.~~
- ~~As part of the approval process, the principal will hold a school conference and council meeting. Parent(s)/guardian(s) are expected to attend and contribute to support a safe, smooth transition.~~



Considerations

- The school team will assess:
 - Student needs and IEP recommendations.
 - Staff and student allergies, phobias, and cultural concerns.
 - Emergency protocols and signage.
 - Transportation requirements.
- Exclusion of a Service Dog
 - Once the use of a Service Dog in a school has been approved, exclusion of the animal from the school or specific areas within the school may only occur under the following circumstances:
 - **Health or Safety Risks:**
The presence of the Service Dog poses a demonstrable risk to the health, safety, or physical or mental well-being of students or staff. This includes situations such as medically documented severe allergies or psychological harm.
 - **Statutory Requirements:**
Exclusion is required by applicable legislation. Examples include:
 - *Health Protection and Promotion Act* and *Food Safety and Quality Act*, which prohibit service animals from areas where food is prepared, processed, or handled (e.g., school kitchens or culinary classrooms). However, Service Dogs are permitted in areas where food is served or sold (e.g., cafeterias or lunchrooms).
 - **Prohibited Breeds:**
The Service Dog belongs to a breed prohibited by law, such as those restricted under the *Dog Owners' Liability Act* (e.g., pit bull terriers).
 - **Material Change in Circumstances:**
There has been a significant change in the circumstances that led to the original approval of the Service Dog (e.g., changes in the student's needs, dog behavior, or school environment).
 - **Legal Obligations:**
Exclusion is otherwise required by applicable federal, provincial, or municipal law.
 - **Duty to Consider Alternatives:**
Before a decision to exclude is made, reasonable efforts must be undertaken to explore alternative arrangements or accommodations that would allow continued access for the Service Dog without compromising health, safety, or legal obligations.
 - **Continuous Progress Monitoring and Support Review**

Data-informed assessment by the school team indicating that the Service Dog is not contributing meaningfully to the student's support goals or academic and/or social-emotional outcomes. Ongoing tracking of effectiveness using measurable indicators (e.g., behavior logs, attendance data, engagement rubrics) must inform this evaluation. Where consistent data collection is lacking or not implemented by



staff, this absence of evidence may hinder the ability to justify the continued presence of the Service Dog and should prompt a review of the support plan.

-
- **Service Dogs for Students Who Are Not the Handler:**
 - When a student cannot independently handle a service dog, the dog is not considered a Service Dog under this procedure. However, the student may still benefit from having the dog as an accommodation. In such cases, a trained adult must supervise and handle the dog. Each request will be assessed individually under the Human Rights Code, considering:
 - The student's disability-related needs;
 - How the service dog supports those needs;
 - Availability of alternative accommodations;
 - Impact on the classroom and school environment.

Communication

- **Inform:**
 - School community (Appendix E).
 - Class-specific families (Appendix F).
 - Transportation families (Appendix G).
 - Post signs on each entry door of the school advising visitors of the presence of a working Service Dog.

Staff Training

- All Educational Assistants (EAs), classroom teachers, Special Education Resource Teachers (SERTs), and principals who may be involved with a student supported by a service dog shall receive training on the role, function, and integration of service dogs within the school environment. This training is essential to ensure a safe, consistent, and inclusive educational experience for the student.

Furthermore, a minimum of three Educational Assistants shall be trained and certified as service dog handlers. Assigning multiple trained handlers is required to ensure uninterrupted support for the student, particularly in the event of staff absences or leaves. Schools should prioritize building a team of trained staff to guarantee that the student has consistent access to their service dog and the support they require throughout the school day. Schools that are allocation less than three Educational Assistants should have all Educational Assistants trained.

Ongoing Review

- Annual update of documentation is required (e.g., IEP, vaccinations, certifications, insurance)
- Principal to notify Superintendent when a Service Dog is introduced or withdrawn.

Parent/Guardian Responsibilities

The Parent/Guardian shall:

- Submit a formal written request to the school outlining the purpose and benefits of having a Service Dog attend the school with their child, including details how the Service Dog will accommodate the student's demonstrated disability related needs.
- Pay for any financial implications regarding the use and care of the Service Dog, which may include additional training from time to time for the Service Dog and the Handler.



- Submit and annually update the school with documentation confirming current vaccinations, a valid municipal Service Dog license, and verification of the dog's good health.
- Ensure the Service Dog's personal care and physical needs are met, including a daily bio-break routine as required.
- Provide proof of general liability insurance coverage in the amount of \$2,000,000.00 to cover any injuries or damages that may arise from the Service Dog accompanying the Handler at school.
- May wish to obtain insurance coverage in the unfortunate event that the dog is stolen or injured through no fault of the board.
- Ensure full compliance with the BHNCDSB Service Animals in Schools policy.

Service Dog Handler Responsibilities

The Service Dog handler shall:

- Maintain the service dog's calm and controlled behaviour, ensuring it remains focused on the handler (e.g., no aggression, excessive barking or whining, jumping on or sniffing others, or begging for food).
- Ensure the service dog remains quietly at rest (e.g., lying under a table or beside the handler) without unnecessary movement when not actively working.
- Ensure the service dog responds promptly and consistently to the handler's commands, cues, or directions.
- Ensure the service dog behaves appropriately in the presence of other dogs or animals.

Principal/Vice-Principal/Designate Responsibilities

The principal, vice-principal, or designate shall:

- Confirm that the dog is a Service Dog and that its use by the student handler aligns with the recommendations and needs identified through the IPRC and/or IEP process. If the dog is not certified or the student is not the handler, and alternative accommodations are determined to meet the student's demonstrated disability-related needs, the Superintendent shall provide written rationale for the decision.
- Consult with the appropriate Superintendent before arranging a meeting regarding the use of a Service Dog.
- Inquire about any significant allergies or anxieties related to the Service Dog and consider appropriate accommodations to address competing rights.
- Organize a meeting with the parent(s)/guardian(s)/adult student, classroom teacher(s), Superintendent of Special Education, a representative from the Service Dog Training Provider, the student (as appropriate), and other relevant staff or resource personnel to develop a comprehensive plan addressing:
 - The role and function of the Service Dog;
 - Training provided to the student handler;
 - Care and physical needs of the Service Dog, including:
 - Designated relief area on school property;



- Procedures for waste removal and disposal;
 - Accessible waste disposal container for the handler;
 - Seasonal and weather-related considerations;
 - Classroom arrangements, including seating;
 - Any required changes to routines, procedures, or programming;
 - Pre-entry visits for the Service Dog to acclimate to the school;
 - Transition planning for the student and dog;
 - Schedule for introducing the dog to the school community;
 - Training plan for school staff (e.g., principal, teachers, EAs);
 - Behavioural expectations and conduct guidelines regarding the dog for students, staff, and visitors;
 - Communication and enforcement strategies for these rules.
- Notify all school staff and the school council of the Service Dog's presence.
 - Collaborate with the appropriate Superintendent and the Student Achievement Lead: Special Education to address any concerns related to the dog's presence.
 - Coordinate demonstrations or educational sessions by the Service Dog provider for students, staff, and/or the school community, as needed.
 - If applicable:
 - Inform Brant Haldimand Norfolk Student Transportation Services about any transportation requirements.
 - Post signage at all school entry points informing visitors of the presence of a working Service Dog.
 - Update emergency protocols (e.g., notify the Fire Department about the Service Dog).
 - Inform the school's Superintendent when the Service Dog begins attending the school and if/when the dog is no longer present.
 - Communicate with stakeholders, letters will be distributed as follows to inform:
 - The school community of the arrival of the Service Dog, its purpose and rules regarding conduct around the Service Dog (Appendix E).
 - The families of the students in any of the classes where the Service Dog will be present to elicit information concerning allergies or anxiety from student's families (Appendix F).
 - The families of any students who will be sharing transportation where the Service Dog will be present, where applicable (Appendix G).
 - All information regarding the Service Dog will be retained in the student's OSR.

~~The parent(s)/guardian(s) must initiate the process by providing a letter to the school requesting permission to have a Certified Service Dog assist their child in school.~~

~~The entry of the Certified Service Dog is decided after extensive consultation and is not automatically approved. Decisions regarding the admittance and integration of Certified Service Dogs into the school environment for the benefit of a student are made on a case-by-case basis.~~

~~When parent(s)/guardian(s) request that their child use a dog in school, it must be determined if the request is for a Certified Service Dog and the principal must review the request with the~~



Superintendent of Education: Special Education. All circumstances of a particular case, including the individual needs of the student being assisted by the dog and the needs of other students will be considered. Where necessary in the decision-making process, rights and needs of one person may need to be balanced against the rights and needs of another.

As part of the approval process, the principal will schedule a school conference meeting and a school council meeting. The parent(s)/guardian(s) are expected to attend and provide input to ensure a safe and smooth transition for all.

When the use of a Certified Service Dog in school has been approved, the animal may be excluded from access to the school or part of the school when:

- There is risk to the health of students/staff or the physical or mental well-being of students as a result of the presence of the Certified Service Dog;
- Exclusion is required by another statute. Examples include the Health and Protection and Promotion Act and Food Safety and Quality Act. The former Act prohibits service animals in places where food is prepared, processed or handled (e.g. kitchen of school cafeteria or culinary arts classroom) although Certified Service Dogs are permitted where food is served and sold (e.g. school cafeteria or lunchroom);
- The Certified Service Dog is a breed that is not prohibited by law. An example would be the Ontario Dog Owner's Liability Act, which places restrictions on pit bull terriers;
- There has been a material change in the circumstances that led to the original approval of the use of the Certified Service Dog in the school;
- Law otherwise requires exclusion; and
- Consideration should be given to options available prior to exclusion of the Certified Service Dog.

Certified Service Dogs for Students Who are not the Handler

When the student is not able to "handle" the dog, the dog will not be considered a Certified Service Dog for the purposes of this procedure but the student may still receive a benefit from utilizing a service dog as an accommodation. Where the student is not the handler, an adult must be trained and must provide supervision and handling of the service dog. As a result, requests to permit the service dog to attend and be integrated into the school environment will be considered individually in accordance with the duty to accommodate to the point of undue hardship pursuant to the Human Rights Code. Factors to be considered include but are not limited to:

- The student's demonstrated disability related needs;
- The accommodation(s) that may be provided by the service dog to meet the student's disability related needs;
- Alternative accommodations available that meet the student's demonstrated disability related needs; and
- The impact on the classroom and school.

Procedures

1.0 Parent/Guardian

The parent/guardian shall:

- 1.1 Provide a letter to the school requesting permission for a Certified Service Dog to the school and outlining the purpose and benefits of having a Certified Service Dog attend the school with their child, including details of the way the Certified Service Dog will accommodate the student's demonstrated disability related to needs, for



~~example providing guidance in hallways;~~

- ~~1.2 Provide a letter from a member of the College of Physicians and Surgeons, a member of the College of Psychologists or nurse qualified in a discipline relevant to the person's disability confirming the recognized disability and related special needs, including a recommendation for the use of a Certified Service Dog;~~
- ~~1.3 Provide a Certificate of Training for the Certified Service Dog and the Handler from the accredited National Service Dog Training Centre or from another certified training centre;~~
- ~~1.4 Pay for any financial implications regarding the use and care of the Certified Service Dog, which may include additional training from time to time for the Certified Service Dog and the Handler;~~
- ~~1.5 Provide and annually update the school with proof of up-to-date vaccinations, a municipal Certified Service Dog license and confirmation that the Certified Service Dog is in good health;~~
- ~~1.6 Arrange for the personal care and physical needs of the Certified Service Dog including once a day bio-break procedure as necessary;~~
- ~~1.7 Provide proof of a general liability insurance coverage in the amount of \$2 000 000.00 in the event of injury and/or damages resulting from the dog attending school with the Handler; and~~
- ~~1.8 The owner of the Certified Service Dog may also consider insurance coverage in the unfortunate situation if the dog were to be stolen or injured at no fault of the board.~~

2.0 Certified Service Dog Handler

~~The certified service dog handler shall:~~

- ~~2.0 Ensure quiet, steady behaviour from the Certified Service Dog while maintaining focus on the Handler (e.g. no aggression, inappropriate barking/crying, jumping on or sniffing of strangers, begging for human food);~~
- ~~2.1 Ensure that when the Handler is at rest, the Certified Service Dog lay quietly under a table or beside the Handler without getting up or moving around excessively;~~
- ~~2.2 Ensure that the Certified Service Dog responds quickly and readily to the Handler's commands, cues and/or directions; and~~
- ~~2.3 Ensure that the Certified Service Dog demonstrates appropriate behaviour around other dogs and animals.~~

3.0 Principal/Vice-Principal/Designate

~~The principal/vice-principal/designate shall:~~

- ~~3.1 Ensure that the dog is a Certified Service Dog and use by the student who is the Handler is consistent with the needs or recommendations of the IPRC and/or IEP process. If the dog is not a Certified Service Dog or the student is not the Handler and the decision is made that alternative accommodations to meet the student's demonstrated disability related to needs are available, the Superintendent will~~



~~identify in writing the rationale for the decision.~~

~~3.2 Consult with the appropriate Superintendent prior to setting a meeting to discuss the use of a Certified Service Dog.~~

~~3.3 Inquire regarding any potential severe allergies and/or anxieties with respect to the Certified Service Dog and consider possible accommodation plans to meet competing rights.~~

~~3.4 Arrange a meeting with parent(s)/guardian(s)/adult student, classroom teacher(s), Superintendent of Special Education, a representative of the Certified Service Dog Training Provider, the student, as appropriate, and other~~

~~staff/resource personal deemed necessary to discuss and develop a plan to determine:~~

- ~~• The purpose and function of the Certified Service Dog;~~
- ~~• Training provided for the Handler (student) of the Certified Service Dog;~~
- ~~• Personal care and physical needs of the Certified Service Dog such as:~~
- ~~• The safest and most environmentally sound place for the Certified Service Dog to relieve itself;~~
- ~~• Removal and disposal of animal waste;~~
- ~~• Provision of a suitable container for waste that the Handler can access;~~
- ~~• Considerations for seasonal changes and inclement weather.~~
- ~~• Classroom considerations such as seating arrangements;~~
- ~~• Any necessary changes in routines, procedures and/or program;~~
- ~~• Arrangements for the Certified Service Dog to visit the school without students present in order to familiarize it with the school site;~~
- ~~• A transition plan for the Certified Service Dog and the student;~~
- ~~• A timetable for the introduction of the Certified Service Dog to the school and class;~~
- ~~• A timetable for the training of the student's school team (i.e. principal, teacher(s), educational assistant(s) etc.);~~
- ~~• Rules of conduct around the Certified Service Dog for students, staff and the public; and~~
- ~~• Methods for disseminating and regulating such rules.~~

~~3.5 Inform all staff and the school council regarding the presence of a Certified Service Dog;~~

~~3.6 Liaise with the appropriate Superintendent, Student Achievement Lead: Special Education to resolve any specific concerns or issues raised regarding the presence of a Certified Service Dog;~~

~~3.7 Arrange for demonstrations by the Certified Service Dog provider for the student body, staff, and/or the community as deemed necessary to provide education and awareness of the Certified Service Dog in the school;~~

~~3.8 If applicable, ensure that the Brant Haldimand Norfolk Student Transportation Services is contacted regarding any transportation requirements; Revise emergency procedures as required to include the Certified Service Dog (e.g. notification to the Fire Department regarding the existence of the Certified Service Dog);~~

~~3.9 Post signs on each entry door of the school advising visitors of the presence of a working Certified Service Dog; and~~

~~3.10 Inform the school's Superintendent that a Certified Service Dog is in place at the school and when/if the Certified Service Dog is no longer going to be at the school.~~

4.0 Communication

~~Letters will be distributed as follows to~~
inform:

- 4.0 ~~The school community of the arrival of the Certified Service Dog, its purpose and rules regarding conduct around the Certified Service Dog (Appendix E);~~
- 4.1 ~~The families of the students in any of the classes where the Certified Service Dog will be present to elicit information concerning allergies or anxiety from student's families (Appendix F);~~
- 4.2 ~~The families of any students who will be sharing transportation where the Certified Service Dog will be present, where applicable (Appendix G); and~~
- 4.3 ~~All information regarding the Certified Service Dog will be retained in the student's OSR.~~

Information for Parents/Guardians Requesting a Certified Service Dog in the School

1. The success of the implementation of a service dog into a school setting depends on clear communication, a well-informed school community and careful planning. The information you provide will assist the principal to make the best possible decisions for your child and other students, as well as for the staff, volunteers and visitors in the school. The information will be filed in your child's Student Record (OSR).
2. The use of a service dog is considered to be an accommodation to help your child learn and to develop the necessary skills to achieve success at school. The use of a companion dog is generally not considered to be an accommodation under the Ontario Curriculum. If your child already has an Individual Education Plan, it will be reviewed at a case conference or one will be developed in consultation with you. The principal will invite you, your child's teacher(s), a representative from ~~an accredited provider of Service Animals, the assistance dog training school, the Special Education Resource Teacher (SERT) in the school, Special Education Consultant and the Student Achievement Leader of Special Education Coordinator and a member of Student Support Services team~~ to the case conference to discuss your child's needs, the accommodations that are already in place for your child as well as the additional assistance provided by the dog.
3. The information you provide will help the principal to implement your request. It is important that you provide the information that addresses the safety of the students and staff. For example, the principal needs to know that the dog has no history of nipping, biting or growling at children or adults nor exhibits aggressive protective behaviours.
4. Provide proof of general liability insurance coverage in the amount of \$2,000,000.00 in the event of injury and/or damages resulting when the dog is attending with the student handler at school.
 - a. Service dogs are generally very expensive. We also recommend confirmation that the owner has coverage in the unfortunate situation if the dog were to be stolen or injured at no fault of the Board.
5. It is important that you reinforce information about the standards in place through the accredited assistance dog school that address the safety of the students and staff.
6. The principal will investigate if any student or member of staff has severe medical or psychological reactions to dogs that may impact the involvement of the service dog at school.
7. The well-being of the dog is very important. Its care, handling and training needs will be addressed

and your input as a trained handler is valuable. The principal also needs to know what other resources are available to facilitate the transition to school and the implementation of the plan. Strategies for becoming familiar with the building and school grounds, introduction to assemblies/concerts, recess and informing the staff about interacting with the dog will need to be included in the planning.

8. The principal, with your assistance, will develop a communication plan to inform students, staff and community members as appropriate.
9. A school assembly presented by ~~an accredited provider of Service Animals a designate of service or guide dog school is required~~ **recommended** to ensure practical understanding of an assistance dog in the school community. Important information shared in this way facilitates understanding and acceptance of new practices at the school. You will be asked to participate in the information session/assembly.
10. After all the discussion is in place, the goal will be to implement the plan as soon as possible. Your responsibilities include:
 - a. Transporting or walking the dog to and from school or facilitating the use of bus transportation,
 - b. Providing the required equipment and dog care items
 - c. Working cooperatively with the school staff to make this accommodation a success,
 - d. assisting the principal to communicate relevant information to the school community,
 - e. providing the principal with required documentation in a timely fashion, and
 - f. Informing the principal of all relevant information that may affect the students and staff.
11. Once the necessary information has been discussed, the principal will consult with the Superintendent of Education and **the Student Achievement Leader of Special Education** Lead prior to the admittance and the implementation of the service or guide dog into the school.



Request for ~~Certified~~ Service Dog Involvement with a Student

School:	
Name of Student:	D.O.B.
Address:	
Name(s) of parent(s)/guardian(s):	
Telephone(s) Home:	Cell

- a) Type of Service Dog: _____
- b) The service dog will provide the following assistance with: _____

- c) Name and contact information of the accredited service dog school that provided the dog, training and will provide follow up support for the school community? _____

I/we understand that it is our responsibility to:

- Provide the principal required documentation regarding training, certification, registration, municipal licensing, vaccinations and health of the dog in a timely fashion;
- Provide required documentation and information regarding disability related needs and accommodations to be provided by the dog in a timely fashion;
- Facilitate transportation of the dog to and from the school;
- Provide general liability insurance coverage in the event of injury and/or damages resulting from use of the dog in school;
- Assume financial responsibility of the dog's training, veterinary care, city/county license and all other related costs;
- Work cooperatively with the school staff and provide and communicate information relevant to the school and school community;
- Provide the required equipment and dog care items;
- Attend to the daily care needs of the dog; and
- Work cooperatively with the school staff to make this accommodation a success.

I/we give permission for this information to be shared with the school community.

Signature of student (if over 18) or parent(s)/guardian(s)	Date
--	------

Signature of student (if over 18) or parent(s)/guardian(s)	Date
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Checklist for Implementation of a Certified Service Dog into a School	Date of Completion and Notes
Advise parent/guardian/adult student (18 years and older) making the request that the Board has a procedure to follow before a decision is made.	
Provide parent(s)/guardian(s)/adult student with the form Request for a Certified Service Dog Involvement with a Student and Information for Parents/Guardians Requesting a Service Dog in the School.	
Inform Superintendent Responsible for Special Education and Student Achievement Lead of Special Education Lead as well as the Superintendent responsible for the school request.	
Ensure that the parent/guardian/adult student submits copies of the following documentation: <ul style="list-style-type: none">• A professional diagnosis of a disability which can be accommodated through the use of a service dog• A current letter from a regulated health professional recommending the Service Dog a member of the College of Physicians and Surgeons or the College of Psychologists and confirming the diagnosis and recommended accommodations to be facilitated by the service dog support• Copy of certificate or letter from accredited training program for dog's and handler's training• Copy of current, official vaccinations certificate for the dog and letter of good health• Proof the dog is registered in Canada through an accredited dog training school• Proof of municipal dog license• Liability Insurance	
Inquiries made regarding any potential severe allergies, anxieties with respect to dogs and possible accommodation plans to meet competing rights of students in the school. AND on busses (considering students from other schools) regarding: <ul style="list-style-type: none">• Allergies• Phobia of Dogs• Cultural sensitivities and other issues• Plan for required accommodations	



Convene a case conference with the following in attendance: <ul style="list-style-type: none">• Parents/Guardians and/or student over the age of 18• Classroom teacher(s), if available	
The case conference discusses and develops a plan for: <ul style="list-style-type: none">• The purpose and function of the Certified Service Dog• Training provided for the Handler (student) and the Certified Service Dog• Personal Care and physical needs of the Certified Service Dog• Classroom considerations such as seating arrangements• Any necessary changes in routine and procedures and program changes• A transition plan for both the Certified Service Dog and the student• A timetable for introduction of the Certified Service Dog to the school and class(es)• A timetable for training of the student's school team• Rules of conduct around the Certified Service Dog for students, staff• Arrange a time for the Certified Service Dog to visit the school without students present in order to familiarize it with the school site	
Review the request with respect to its consistency with the IEP and/or recommendations from the IPRC.	
Inform school staff that a request has been made and receive their input.	
Inform appropriate bus contact that a request has been made and receive input. If transportation is being used through the consortium and the transportation is shared with another Board(s) then those Boards must be contacted so that they can also complete their assessments and communicate with school community members.	
Inform School Council and community at a School Council meeting and receive their input.	
Contact the Fire Marshall and with assistance, create a plan for fire and emergency exit. Plan must be included with school fire plan.	
Meet with the parent(s)/guardian(s)/adult student, to inform them of the information, you have received and if the service dog is approved,	
develop the implementation plan, including fire and emergency exit plans and Management Plan for the Care of the Dog.	
Advise the Superintendent and the Student Achievement Leader of Special Education Lead of your actions.	



IEP should be updated as needed along with any behaviour plans.	
Develop a communication strategy to inform students, staff, community and relevant employee representatives. Include information in registration packages.	
Post signs on the entrance doors and at any other appropriate places to advise visitors of the dog's presence.	
Monitor and review the implementation on a regular basis. Including updated medical information for the service dog and records of re-training and updating.	
File relevant documentation and correspondence in the documentation file of student's OSR.	
Update plan and documentation yearly as required (IEP, certification, vaccinations, Fire and Emergency plan, good health records, etc.)	
Inform the Superintendent that a Certified Dog is in place at the school and when/if the <u>Certified</u> Dog is no longer going to be at the school.	



Management Plan for the Care of the ~~Certified~~ Service Dog

Student Name: _____ DOB: _____

Student Number: _____ School Year: _____

Name of Dog: _____

School: _____

Note: Where possible and feasible, these responsibilities should be handled by the student in the same manner as at home.

Dietary Needs: _____

Water Needs: (e.g. provision of water bowl, procedures for use, cleaning, etc.)

Bladder/Bowel Needs of Dog (e.g. frequency, location, disposal, etc.)

Other considerations:

1. Hot weather: _____

2. Winter weather: _____

3. Additional considerations: _____

Signature Student: _____

Date: _____

Signature Parent/Guardian: _____

Date: _____

Signature Principal: _____

Date: _____



[School Letterhead]

[Insert Date]

Re: Service Animals in School Facilities

Dear Parent/Guardian:

This letter is to inform you that there will be a ~~Certified~~ Service Dog in our school assisting one of our students.

This ~~Certified~~ Service Dog is a highly trained ~~Certified~~ Service Dog for our student and is able to assist in many of the routine activities, which may pose some challenges for this student. This child's right to have a ~~Certified~~ Service Dog is protected under Human Rights legislation.

There will be an information session at the school to integrate the ~~Certified~~ Service Dog into our daily routines and all our students will be instructed as to the proper procedure regarding the Certified Service Dog. They will be informed that the ~~Certified~~ Service Dog is a working ~~Certified~~ Service Dog and not a pet while at school.

We anticipate the ~~Certified~~ Service Dog being a benefit to the student's learning and we look forward to this new addition to our school community.

Thank you for your understanding and support.

Sincerely,

Full Name

Title

c: Name – Title, Location (if applicable) *(names are listed alphabetically by last name)*
Superintendent of Education: Family of Schools, Special Education
OSR

Attachment or Enclosure (if applicable)
XX:xx (AUTHOR INITIALS:your initials)



[School Letterhead]

[Insert Date]

Re: Service Animals in School Facilities

Dear Parent/Guardian:

This letter is to inform you that there will be a ~~Certified~~ Service Dog in our school assisting one of our students and this student and the ~~Certified~~ Service Dog will be a part of your child's class.

This ~~Certified~~ Service Dog is a highly trained ~~Certified~~ Service Dog for our student and is able to assist in many of the routine activities, which may pose some challenges for this student. This child's right to have a ~~Certified~~ Service Dog is protected under Human Rights legislation.

There will be an information session at the school to integrate the ~~Certified~~ Service Dog into our daily routines and all our students will be instructed as to the proper procedure regarding the ~~Certified~~ Service Dog. They will be informed that the ~~Certified~~ Service Dog is a working ~~Certified~~ Service Dog and not a pet while at school.

If you have any specific concerns regarding the presence of the ~~Certified~~ Service Dog in your child's class, please contact me at the school.

Thank you for your understanding and support.

Sincerely,

Full Name
Title

c: Name – Title, Location (if applicable) *(names are listed alphabetically by last name)*
Superintendent of Education: Family of Schools, Special Education
Classroom Teacher (s)
OSR

Attachment or Enclosure (if applicable)
XX:xx (AUTHOR INITIALS:your initials)



[School Letterhead]

[Insert Date]

Re: Service Animals in School Facilities

Dear Parent/Guardian:

This letter is to inform you that there will be a ~~Certified~~ Service Dog in our school assisting one of our students and this student and the ~~Certified~~ Service Dog will be a part of your child's transportation.

This ~~Certified~~ Service Dog is a highly trained ~~Certified~~ Service Dog for our student and is able to assist in many of the routine activities, which may pose some challenges for this student. This child's right to have a ~~Certified~~ Service Dog is protected under Human Rights legislation.

There will be an information session at the school to integrate the ~~Certified~~ Service Dog into our daily routines and all our students will be instructed as to the proper procedure regarding the ~~Certified~~ Service Dog. They will be informed that the ~~Certified~~ Service Dog is a ~~working~~ Certified Service Dog and not a pet while at school.

If you have any specific concerns regarding the presence of the ~~Certified~~ Service Dog on your child's mode of transportation, please contact me at the school.

Thank you for your understanding and support.

Sincerely,

Full Name
Title

c: Name – Title, Location (if applicable) *(names are listed alphabetically by last name)*
Superintendent of Education: Family of Schools, Special Education
Classroom Teacher (s)
OSR
Transportation

Attachment or Enclosure (if applicable)
XX:xx (AUTHOR INITIALS:your initials)

REPORT TO THE BRANT HALDIMAND NORFOLK CATHOLIC DISTRICT SCHOOL BOARD POLICY COMMITTEE

Prepared by: Rajini Nelson, Superintendent of Business & Treasurer
Presented to: Policy Committee
Submitted on: June 6, 2025
Submitted by: Mike McDonald, Director of Education & Secretary

Purchasing Cards - #700.07

Public Session

BACKGROUND INFORMATION:

The Brant Haldimand Norfolk Catholic District School Board (the “Board”) remains committed to maintaining a high standard of stewardship and accountability in all aspects of decision-making and operational practice.

The primary objective of the P-Card program is to enable staff members to purchase low-dollar goods and services in an efficient, timely, and cost-effective manner. The program reduces administrative burdens associated with traditional procurement processes by allowing eligible employees to make necessary purchases directly.

The purpose of this Policy and Administrative Procedure outlines the expectations pertaining to the use of P-Cards and includes information on the acceptable use and limitations of Board P-Cards.

DEVELOPMENTS:

In its continued efforts to **strengthen accountability** and ensure that the P-Card system is used properly, the Board has conducted a review of the existing P-Card policy. As a result of this review, the following additional measures are included:

- **Monthly Spending Reviews:** A formal requirement has been established for a monthly review of all P-Card transactions.
- **Compliance Monitoring:** These monthly reviews are intended to verify compliance with the P-Card policy, identify any irregularities, and ensure that all purchases are properly documented and authorized.
- **Strengthened Controls:** Monthly spending reports to be submitted to the Superintendent of the Business to enhance internal controls.

RECOMMENDATION:

THAT the Policy Committee recommends that the Committee of the Whole refers the Purchasing Cards Policy #700.07 to the Brant Haldimand Norfolk Catholic District School Board for approval.



Purchasing Cards

#700.07

Adopted:	June 26, 2007
Last Reviewed/Revised:	February 27, 2024
Responsibility:	Superintendent of Business Services & Treasurer
Next Scheduled Review:	2027-2028

POLICY STATEMENT:

The Brant Haldimand Norfolk Catholic District School Board (the "Board") is committed to a high level of stewardship and accountability with respect to all decisions and practices. The Board recognizes the need for staff to purchase certain low dollar goods and services in an efficient and timely manner.

APPLICATION AND SCOPE:

A Purchasing Card (or "P-Card") is intended to facilitate the purchase and payment of a large volume of low value purchases. To minimize risk and financial expense to the Board, P-Cards will only be issued to authorized individuals who have a legitimate business reason for having a P-card and who need to use the P-Card on a regular basis in carrying out their assigned duties.

The purpose of this Policy and Administrative Procedure outlines the expectations pertaining to the use of P-Cards and includes information on the acceptable use and limitations of Board P-Cards.

REFERENCES:

- [Broader Public Sector Accountability Act](#)
- [Broader Public Sector Procurement Directive and Implementation Guidebook](#)
- [Broader Public Sector Perquisites Directive](#)
- [Broader Public Sector Expenses Directive](#)
- [GOV 100.10.P - Trustee Expenses](#)
- [FIN 700.01.P - Procurement](#)
- [FIN 700.04.P - Employee Expenses](#)
- Purchasing Card Handbook (staff only)

FORMS:

- N/A

DEFINITIONS:

Budget Holder: a person who is accountable for the spending decisions in their area of responsibility.

Cardholder: authorized Board staff who hold a Board-issued P-Card in their name.

Merchant Category Classification (MCC): classification of business by the type of goods or services provided. Classification can be assigned or blocked to restrict P-Card usage. They also are used for reporting purposes.

Monthly Spend Limit: the maximum dollar threshold, including taxes, allowed on a P-Card for a one-month statement period.

Purchasing Card (P-Card): a commercial card that allows organizations to purchase goods and services in lieu of a traditional purchasing process and up to specified amounts for approved business purposes.



Purchasing Card Administrator: administers the P-Card program (system administration, card management, process and procedure development, education, user support, compliance review, reporting, etc.). Typically, the P-Card Administrator is the Manager of Procurement and Risk Management Services (or delegate).

Transaction Limit: A maximum per transaction dollar limitation placed on each card charge.

ADMINISTRATIVE PROCEDURES:

Any new P-Cards issued to staff must have the approval of their Principal/Manager or Superintendent, as well as final approval from the Superintendent of Business & Treasurer before the card is ordered. Any changes to P-Card limits must also receive formal approval from the Manager of Procurement and Risk Management Services.

RESPONSIBILITIES

Cardholder

- i) Review, agree and sign a Purchase Card Agreement outlining cardholder responsibilities.
- ii) Ensure each purchase remains within the individual's transaction limit and monthly credit limit.
- iii) Ensure compliance to Board policies and procedures.
- iv) Verify accuracy of monthly statements and take appropriate, immediate action to correct any errors.
- v) Retain original transaction receipts for reconciliation and audit purposes (photocopies not acceptable).
- vi) Reconcile the monthly statement using the prescribed transaction log, obtain approval from applicable supervisor and submit to Financial Services within ten business days of receipt of the statement.
- vii) Immediate notification to the P-Card Administrator in the event of a lost or stolen card.
- viii) Notify supervisor and P-Card Administrator of any changes in circumstance (name, address, role, department, etc.).
- ix) Ensure sufficient budget is available to support the purchases on the P-Card.

Cardholder's Supervisor

- i) Ensure each Cardholder has read and understood their responsibilities as outlined in this Policy and Administrative Procedure and Purchasing Card Handbook regarding the use of the P-Card.
- ii) Review and approve (where applicable) the monthly statement and transaction log within the timelines established by Financial Services.
- iii) Ensure the Cardholder is compliant with policies and procedures in the use of the P-Card.

P-Card Administrator

- i) Under the authority of the Superintendent of Business & Treasurer, issue, cancel or revoke the P-Card in accordance with policies and procedures.
- ii) Provide Cardholder(s) with training and support in the appropriate use of the P-Card.
- iii) Authorize changes to Cardholder information, card limits and MCC codes.
- iv) Maintain list of P-cards issued **and monitor the usage of P-Cards.**
- v) **Conduct a regular review, audit, and verify compliance with the policy.**
- vi) **Provide a report** to the Superintendent of Business & Treasurer on usage of all P-Cards **monthly highlighting details such as the maximum amounts used, irregular transactions, activities on cancelled P-Cards and or any compliance oversight.**

USE AND RESTRICTIONS

The P-Card is intended to facilitate the purchase and payment of low value goods and services required for Board business. It is the expectation that eligible and authorized staff will use a Board issued P-Card, as opposed to a personal credit card. The use of a personal credit card may result in a denial or delay in reimbursement.

Each P-Card is established with an individual transaction limit and a monthly credit limit, which can be found on the P-Card agreement.



P-Cards **may not** be used to:

- i) Bypass an existing Board contract, policy, or procedure.
- ii) Purchase furniture, equipment (including any technology items), software or other tangible capital asset unless prior approval from Procurement Services has been obtained.
- iii) Transact any personal expenses; such use may be deemed fraudulent and could result in disciplinary action up to and including dismissal.
- iv) Purchase gift cards unless prior approval from Procurement and/or Financial Services has been obtained.
- v) Split purchases into multiple transactions to circumvent approved Cardholder limits.
- vi) Obtain cash advances.
- vii) Honoraria (payments of fees for services performed by individuals not employed by the Board).
- viii) Payments to other schools or other Board departments.
- ix) Alcohol.
- x) Employee gifts (e.g., flowers for assistant's day, retirement gifts, etc.).
- xi) Gift for trustees, government employees or other Broader Public Sector organizations.

Certain types of merchants, including (but not necessarily limited to) liquor stores and cannabis outlets have been blocked on Board issued P-Cards. Attempts to purchase items from these vendors will be declined when the P-Card is presented at these restricted vendors. This blocking is applied on a vendor-by-vendor basis based on the assigned MCC. As a result, some otherwise legitimate purchases from blocked vendors will not be able to be made by using the P-Card.

Board P-Cards must not be tied to a "PayPal" or like payment service account. If no other payment option exists, contact Procurement and Risk Management Services.

Exceptions are subject to the approval of the Superintendent of Business & Treasurer.

Circumstances not specifically noted in this Policy and Administrative Procedure must be brought to the attention of the P-Card Administrator for review and recommendation of the most cost effective and compliant method for the purchase of the material or service in question.

ISSUANCE OF P-CARDS

In general, P-Cards are issued to individuals where there is an ongoing and/or frequent need to purchase goods and services that fall under their responsibilities and/or brings efficiency to the procurement process. The following roles are eligible to use a P-Card:

Role	Maximum Credit Limit
Director and Superintendents	\$5,000
Manager of Procurement and Risk Management Manager of Information Technology Manager of Facility Services	\$5,000
Executive Assistants	\$3,000
Manager of Financial Services Manager of Human Resource Services Manager of Communication Services	\$3,000
Facility Services Supervisors and Coordinators	\$3,000
Student Achievement Leads – Curriculum and Special Education	\$3,000

Any changes to the above chart are subject to the approval of the Superintendent of Business & Treasurer.

Purchasing cards are issued to individuals upon full approval of a P-card application. Any new P-Cards issued to staff must have the approval of their Principal/Manager or Superintendent, as well as final approval from the Superintendent of Business & Treasurer before the card is ordered.



CHANGES AND CANCELATION

Any changes to P-Card limits and/or MCC permissions must also receive formal approval from the Manager of Procurement and Risk Management Services.

Cards will be cancelled in the following circumstances:

- i) Upon termination of employment with the Board.
- ii) When specifically requested to do so by the supervisor.
- iii) When a change in job responsibility dictates that a card is no longer required.
- iv) When repeated misuse has occurred and at the discretion of the Superintendent of Business & Treasurer.