



Huron-Superior Catholic

DISTRICT SCHOOL BOARD

PROCEDURAL GUIDELINES

SPECIAL EDUCATION PERSONAL PROTECTIVE EQUIPMENT (PPE) PROGRAM

Purpose

The *Occupational Health and Safety Act* states that a Workplace Violence and Harassment program must “include measures and procedures to control the risks identified in the assessment required under *subsection 32.0.3(1)* as likely to expose a worker to physical injury. Furthermore, the Board (employer) also has an obligation to ensure they are taking every precaution reasonable in the circumstances for the protection of the worker.” (S. 25(2)h, *Occupational Health & Safety Act*)

The use of Personal Protective Equipment (PPE) may be necessary; therefore, the purpose of these procedural guidelines is to outline the process for:

- Identifying when PPE is required to protect workers who are exposed to a risk of injury as a result of working directly with students with a history of aggressive or violent behaviours;
- Outline what PPE (including specially designed protective clothing) is most appropriate in the circumstances, and;
- Ensuring that appropriate instruction and training is provided for the appropriate care and use of such equipment.

This procedural guideline is an extension to HSCDSB Policy 6019, “*Personal Protective Equipment*” and its related Procedural Guideline “*Personal Protective Equipment Program*”

Related Documents

Ontario Occupational Health and Safety Act R.S.O. 1990

HSCDSB Policy 4024 – Workplace Violence Procedural Guidelines

HSCDSB Policy 6019 – Personal Protective Equipment

HSCDSB Policy 6019 – Personal Protective Equipment Program Procedural Guideline

HSCDSB Policy 6003 – Occupational Health and Safety

Definitions

In this guideline:

Personal Protective Equipment (PPE) – refers to specialized equipment or clothing that has been approved for use by a worker to protect against safety or health hazards related to working with students with a history of aggressive or violent behaviours. PPE is generally designed to reduce occupational risk of injury, not to remove or eliminate workplace hazards. Examples of PPE may include protective clothing, such as arm guards, shin guards, jackets or pants. Clothing and other items not specifically designed or intended to be used for workplace personal protection (e.g. denim jackets) shall not be used or assigned as PPE unless approved for such use in accordance with these guidelines.

Prevention and Intervention Training – refers to instruction provided to help manage student behaviour and help de-escalate aggressive or violent behaviour situations and may be considered as a reasonable measure to prevent a recurrence of a violent incident. Training for this purpose may include Behaviour Management Systems (BMS).

Supervisor – means the person designated by title and practice as the person having organizational authority to direct the work of workers in a particular area. In the case of school sites, the supervisor also includes the principal or, in the principal's absence, the vice-principal or other designate. A supervisor is also a worker.

Worker – refers to the same meaning of “worker” within subsection 1(1) of the Occupational Health and Safety Act, means any of the following:

1. A person who performs work or supplies services for monetary compensation.
2. A secondary school student who performs work or supplies services for no monetary compensation under a work experience program authorized by the school board that operates the school in which the student is enrolled.
3. A person who performs work or supplies services for no monetary compensation under a program approved by a college of applied arts and technology, university or other post-secondary institution.
4. Repealed: 2017, c.22, Sched. 1, s.71 (2).
5. Such other persons as may be prescribed who perform work or supply services to an employer for no monetary compensation;

The definition of “worker” does not include a volunteer who works for no monetary payment of any kind.

Workplace – Workplace means the office, school, or other worksite where the individual is customarily employed, and includes all other places which result from employment responsibilities or employment relationships, including Board or committee meetings, work-related social functions, work assignments outside the office/school, field trips, work-related conferences or training sessions, and work-related travel.

Workplace Violence – means

(a) the exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker;

(b) an attempt to exercise physical force against a worker, in a workplace, that could cause physical injury to a worker; or

(c) a statement or behaviour that it is reasonable for a worker to interpret as a threat to exercise physical force against a worker, in a workplace, that could cause physical injury to a worker

Responsibilities

Role of Supervisors

Supervisors shall:

- Take reasonable steps for the protection of workers from the risks of aggressive or violent behaviour;
- Facilitate worker access to required information about students they are to work with
- Make workers aware of the (actual or potential) hazards in the workplace;
- Determine that, as a measure of last resort, PPE is required to be worn by workers under their supervision and/or themselves;
- Encourage workers to keep up to date with personal medical shots such as Tetanus and Hepatitis
- Identify the need for PPE and student safety plan assessments in their facilities;
- Arrange for the provision of the PPE, and ensure, where applicable, that it is properly fitted;
- Arrange for/provide information and training to workers on the proper use, care and maintenance of any PPE provided;
- Ensure that proper instruction is provided to workers as to when and how the PPE is to be used;
- Ensure the student safety plan is updated to include reference to the PPE, including what, when and how the PPE is to be used;
- Stop any work in the facility when it contravenes the procedures outlined in this Program.
- Encourage worker use of PPE as a tool to minimize the risk of injury;
- Enforce the use of PPE as per the student safety plan, using the principles of progressive discipline, as necessary;
- Wear PPE as required; and;
- Request replacement PPE as required.

Superintendent of Special Education

The Superintendent of Special Education shall:

- Determine proper training program offerings to increase worker safety and minimize risk of injury;
- Ensure funding is made available for worker training, PPE program development and management, product research, purchase, testing, training, and dissemination of PPE;
- Oversee the approval process for PPE in collaboration with the Coordinator of Special Education, Special Education Team and the Health and Safety Officer;
- Designate staff to complete assessments and re-assessments;
- Where there is disagreement regarding the need for or contents of a PPE in the Student Safety Plan, the Superintendent will make the final decision;
- Encourage use of PPE as a tool to minimize the risk of injury; and;
- Ensure supervisor compliance with duties set out under this program;

Role of Health & Safety Officer:

The Health & Safety Officer shall:

- Maintain a list of PPE that has been approved for use;
- Provide advice and support to schools with regard to the determination of when and how PPE is to be used;
- Encourage use of PPE as a tool to minimize the risk of injury;
- Update this PPE program as required;
- Review the effectiveness of newly assigned PPE after 15 days; and;
- Consult with the Joint Health and Safety Committee (JHSC), as appropriate and required to allow them to fulfill their responsibilities under the Occupational Health & Safety Act (OH&S Act) related to the use of PPE in the workplace.

Role of Workers:

Workers shall:

- Use or wear properly the PPE that the employer requires to be used or worn;
- Inspect PPE before each use;
- Report absences or defects in any PPE of which the worker is aware and may endanger themselves or another worker to their supervisor immediately; and;
- Not use PPE in a manner that may endanger themselves or others.

Role of Special Education Department Staff (Autism Advisors, Behaviour Coaches, Mental Health Team, Speech and Language, etc.)

Special Education Department Staff shall:

- Identify training needs and facilitate training delivery;
- Identify potential PPE or programs to reduce the risk of injury;
- Encourage workers to keep up to date with personal medical shots such as Tetanus and Hepatitis;
- Encourage worker use of PPE as a tool to minimize the risk of injury ;
- Wear PPE as required;
- Request replacement PPE as required;
- Refer any inquiries regarding PPE and student safety plans to the Special Education Coordinator;
- Provide support with regard to behaviour management strategies;
- Act as the subject matter expert on matters related to student behaviour management; and;
- Consult on what PPE should be considered based on the specific risks that are present in the circumstances.

Procedures for Determining PPE

PPE should be considered a measure of last resort, after other reasonable control measures have been investigated, implemented and found to be ineffective in mitigating the risk of harm to a worker. The use of PPE is intended to reduce occupational risk that cannot otherwise be mitigated by the use of other reasonable measures; PPE does not remove or eliminate workplace hazards.

Prior to requiring the use of PPE in any situation, other measures or controls that should be considered by the Supervisor, include:

- Reviewing programming and other strategies to engage the student in productive learning activities, including those which may be outlined in an individual education plan (IEP), if applicable;
- An examination of the behaviours of students with whom the worker may work; the student's IEP; the student's safety plan; previous incident statistics/ details; interviews with teacher, support staff, principal, special education team; Board mental health team, Board health and safety objectives; legislative requirements; and other pertinent information as required.
- Development and implementation of a simplified safety plan, safety plan, and, where appropriate, a safe plan, in consultation with classroom teacher(s), Early Childhood Educator(s), Educational Assistant(s) and other school-based staff who have regular direct contact with the student;
- Consultation with the multidisciplinary team to identify and implement behaviour management strategies; and, consider other referrals for central support (e.g., Behaviour Team, etc.)
- Provision of appropriate behaviour management or prevention and intervention training for workers (including casual workers who may be assigned to work directly with the student);
- Reviewing and revising the safety plan, including consideration and implementation (where appropriate) of recommendations from the JHSC;
- Review whether additional Board supports are required on an interim or longer-term basis;
- Review of the student's placement, for example, consideration of placement in a specialized program;
- Implementation of a reduced school day, with a plan for return to full day attendance, in consultation with the Superintendent of Education responsible for Special Education.

The temporary removal of a student who has demonstrated aggressive or violent behaviours through an exclusion (non-disciplinary) or suspension/expulsion (disciplinary), may be considered where circumstances warrant, consistent with the provisions of the Education Act, Ministry and Board policies and procedures, and in alignment with the Board's obligations to provide educational services without discrimination on the basis of disability under the Ontario Human Rights Code. These measures, if employed, can provide an opportunity to put other measures in place within the school, including arranging for PPE.

Determination of Appropriate PPE

In the event a reasonably foreseeable risk of injury from aggressive or violent behaviour continues to exist following the consideration and implementation of reasonable measures, as outlined above, and following consultation with Special Education, Health and Safety Officer, and the affected staff, the Supervisor will develop a plan for the use of PPE, including identifying what type of PPE may be available and appropriate in the circumstances based on the frequency, duration, intensity and nature of the aggressive behaviours.

As part of selecting what PPE will be used, consideration must be given to selecting the least restrictive equipment for the circumstances. OH&S, in consultation with Special Education, will develop and maintain a list of PPE that has been approved for use by workers to mitigate the risks associated with aggressive or violent student behaviours.

Once the appropriate PPE has been identified, the Supervisor will, as part of the plan:

- a) Provide specific direction on who is required to use the PPE;
- b) Identify clearly when the PPE is to be used, for example, at all times, when certain triggers are noted, and/or during certain activities;
- c) Make arrangements to ensure that workers are properly fitted, where appropriate.
- d) Ensure affected workers are assigned their own individual PPE, or, where appropriate, have access to shared PPE. Where PPE is worn next to the skin, it must be cleaned and disinfected prior to being worn by another worker.
- e) Ensure workers are provided with necessary instruction on when and how to use and maintain the PPE;
- f) Should a replacement/ temporary/ supply/ casual worker be assigned to work with the student for whom PPE and Student Safety Plan has been identified, the replacement worker must be protected with the identified PPE and have access to a copy of the Student Safety Plan. Each facility shall decide how this requirement shall be met within their facility. (“Consider training two EAs if the physical or behavioural needs are very demanding with a student. The EAs could share the workload, half, or quarter day periods with the student. This works well when one EA is absent. This also fosters more independence in the student with special needs”)
- g) Update the relevant safety plan to include the information outlined in a) and b) above.

The Health & Safety Officer shall support the Supervisor with items a, b, e above, by utilizing the following appendices:

- Appendix B – *Personal Protective Equipment (PPE) Issuance Letter – Student*
- Appendix C – *Personal Protective Equipment (PPE) Training Record*
- Appendix D - *Personal Protective Equipment (PPE) Care Guidelines*

Re-Assessment of PPE

Once PPE is introduced, an assessment of whether the PPE has been effective in protecting the worker should be conducted within fifteen (15) days following introduction. The re-assessment should consider whether:

- a) the PPE has been effective in protecting the worker from harm;
- b) the PPE has had an impact on the frequency or nature of the behaviours;
- c) different and/or more PPE is required.

In addition, the Supervisor will, at regular intervals, review the use of all PPE to determine whether it is still required for the protection of the worker(s). Such review will include whether the PPE has been effective in preventing harm, the effectiveness of other strategies in reducing aggressive or violent behaviours, and how often the PPE has been required.

If PPE has not been required to be worn or used in a reasonable period of time to protect a worker from harm, consideration should be given to whether it is still required. **Any changes related to the requirement for PPE must be reflected through an update to the safety plan.**

Re-assessment of PPE may be triggered in any of the following situations:

- a) Changes in student behaviours or removal/ addition of a student safety plan
- b) Re-assignment of worker to a different student
- c) Based on an assessment of accident/ injury statistics by the Board's Superintendent responsible for Special Education, Special Education Team, or Health and Safety Officer
- d) As requested by the school Principal
- e) May be requested by the Joint Health and Safety Committee based on worker injury statistics
- f) Where mitigating techniques are employed but are unsuccessful at resolving the issue, a reassessment may be requested

In some situations, when there are student behaviour changes and PPE and student safety plan is no longer warranted, the plan may be repealed. Repealing of PPE and student safety plan will be at the discretion of the Supervisor and the Special Education Team.

Individuals conducting a re-assessment shall consult Appendix "A"; "*Checklist for Assigning Personal Protective Equipment, and "When Personal Protective Equipment is Unnecessary"*".

Distribution – Obtaining New PPE or Replacement PPE

A central inventory of PPE will be established and maintained by the Health & Safety Officer for purposes of supporting schools. In the event the required PPE is not available, arrangements will be made through the Health & Safety Officer to purchase and distribute the required PPE in accordance with applicable procurement practices.

At the end of every school year, principals will review their inventory of PPE. If a student for whom PPE has been assigned is returning the following school year, the PPE will be kept at the school in preparation for the student's return.

At the beginning of every school year, principals will review existing plans related to PPE and identify any new needs (e.g. different staff needing to be fitted).

If a student is leaving the school, the principal will consult with the Health & Safety Officer and, where applicable, the receiving school within the Board, to determine whether the PPE should be returned to the central inventory or forwarded to the receiving school.

Role of Joint Health & Safety Committee in PPE

The JHSC may be consulted about the general use of PPE, including the nature and type of PPE that has been identified for use by workers in different circumstances.

Compliance

Once PPE has been issued and a Student Safety Plan developed, **PPE must be worn at all times as indicated** on the Student Safety Plan.

Supervisors will be responsible for enforcing the proper use, care and donning of PPE.

If a Worker has been issued PPE and it is not being used as stipulated in this PPE Program and Student Safety Plan, the Worker may be subject to discipline.

APPENDIX A

Checklist for Assigning Personal Protective Equipment (PPE) – Workplace Violence Related

- Have all other reasonable measures been considered and implemented to protect the worker?
- Have you consulted with the Health & Safety Officer and Special Education about whether other measures may be available?
- Notwithstanding that all other reasonable measures have been tried, is there still a risk of injury due to aggression or violent behaviour?
- Have you contacted the Health & Safety Officer for the approved list of PPE?
- What type of approved PPE would be appropriate in the circumstances? Protective clothing? What parts of the body are you trying to protect?
- Have steps been taken to ensure proper fit, where applicable?
- Have you provided information and training to workers on the following:
 - a) What PPE is required to be worn and when;
 - b) The proper use and care of the PPE
- Has the safety plan been updated to reflect the requirement to wear PPE, including how and when it is to be used?
- Have arrangements been made to provide casual staff with PPE, as required?

When Personal Protective Equipment (PPE) is considered unnecessary:

- Where other mitigating techniques may be employed to eliminate the risk of injury, PPE may be considered unnecessary.
- In this case, upon completion of the assessment, the Special Education Team will identify the alternative mitigating techniques in a recommendation to the Supervisor
- It will be the responsibility of the Supervisor to act on the recommendations provided.
- If the mitigating techniques do not fully resolve the issue and the risk of injury continues to be present, a re-assessment may be requested.