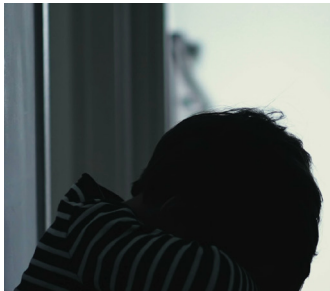


2024
**Report of the Auditor General
to the Nova Scotia
House of Assembly**



**Preventing and Addressing
Violence in Nova Scotia Public
Schools**



Performance Audit
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June 11, 2024

Danielle Barkhouse, Lisa Lachance and Nolan Young
Deputy Speakers
House of Assembly
Province of Nova Scotia

Dear Deputy Speakers:

I have the honour to submit herewith my Report to the House of Assembly under Section 18(2) of the *Auditor General Act*, to be laid before the House in accordance with Section 18(4) of the *Auditor General Act*.

Respectfully,

Kim Adair, FCPA, FCA, ICD.D

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Preventing and Addressing Violence in Nova Scotia Public Schools

Department of Education and Early Childhood Development

Key Messages

- There is an inadequate focus on preventing and addressing violence in schools at the Department of Education and Early Childhood Development.
- Educators not adequately supported to manage violence in their workplace.
- Department does not know the full extent of violence in schools due to significant data collection weaknesses.

Why We Did This Audit

- Reported incidents of school violence against educators and students increased by 60 per cent over the past seven years.
- According to UNESCO, school violence has severe and lasting consequences on the mental health, well-being and education of children.
- *Occupational Health and Safety Act* requires employers ensure the health and safety of employees.

Pervasive School Violence Requires Strong Leadership and Community Commitment to Ensure Safe Learning Environments

- The Department does not have a provincewide strategy to address violence in schools.
- The Provincial School Code of Conduct Policy is the primary guidance to help educators manage violence in schools, however, significant weaknesses identified.
- School violence incidents against students and educators increased provincewide by 60 per cent over the last seven years, from 17,000 to 27,000, with roughly 50 per cent occurring in Halifax Regional Centre for Education (HRCE).
- Over 18 per cent (26,000) of reported violent incidents over the last seven years had no record of any action taken by school administration.
- Training for educators on how to manage violence in schools is limited.
- Data collection does not identify if a student or educator is repeatedly impacted by violence.
- Educators indicated a variety of reasons for not reporting incidents including the perception no action will be taken by school administration.
- We found significant reliability and accuracy weaknesses with school violence data. The World Health Organization highlights the importance of quality data to inform decision makers to identify trends and monitor where change is needed.
- Educators identified several potential reasons contributing to increased violence in schools including increasingly diverse and complex student needs.
- Halifax Regional Centre for Education and Conseil scolaire acadien provincial (CSAP) are not monitoring whether schools are appropriately developing and implementing workplace violence risk assessment and prevention plans as required by the Occupational Health and Safety (OH&S) Violence in the Workplace Regulations.
- Tracking improvements needed for lockdown and hold-and-secure incidents to improve management monitoring and oversight.
- Parents and guardians play an essential role in preventing and addressing violence in schools.



Reference Guide – Key Findings and Observations

Paragraph	Key Findings and Observations
<i>Pervasive School Violence Requires Strong Leadership and Community Commitment to Ensure Safe Learning Environments</i>	
1.20	School violence can be defined in a variety of ways
1.26	The Department does not have a provincewide strategy to address violence in schools
1.33	Addressing school violence is a shared responsibility
1.34	Other Canadian provinces increasing focus to address violence in schools
1.36	The Halifax Regional Centre for Education and Conseil scolaire acadien provincial are not complying with OH&S Act Violence in the Workplace Regulations
1.38	Required Occupational Health and Safety risk assessments need improvement
1.45	Educators indicated training to manage school violence is limited
1.49	Training to educators to manage school violence varies depending on position and student needs
1.53	Teacher Assistant training differences between HRCE and CSAP
1.61	Required biennial Provincial School Code of Conduct Policy review overdue by six years
1.62	Provincial School Code of Conduct Policy needs improvement
1.63	Sixty-one per cent of educators responding to our provincewide survey indicated the Provincial School Code of Conduct Policy does not provide enough support and guidance to manage and respond to violence in schools
1.65	No supporting policies for Provincial School Code of Conduct Policy
1.71	Various reasons highlighted by educators contributing to the increase in violence in schools
1.72	Educators experiencing challenges with implementing the Inclusive Education Policy
<i>Data on Violent Incidents Underreported and Unreliable</i>	
1.77	PowerSchool data shows increasing trend in reported school violence
1.83	The Department not using incidents reported in PowerSchool to assess overall extent of violence against educators in the workplace
1.86	The Department inappropriately relying on Occupational Health and Safety function at RCEs and CSAP to track violence in the workplace
1.92	The Department does not regularly review or analyze incident data in PowerSchool for trends
1.94	No regular review of trends of violent incidents by Halifax Regional Centre for Education and Conseil scolaire acadien provincial
1.96	Educators indicated a variety of reasons for not reporting incidents
1.99	Teacher Assistants do not have access to PowerSchool to report incidents
1.102	Educators being challenged on reporting incidents by school administration
1.105	Some educators only reporting incidents when seeking additional resources
1.107	Educators indicate little to no training on how and when to report incidents in PowerSchool
1.109	Our testing found some incidents could be reported under multiple categories
1.113	No method to track repeated instances of violence against the same student or educator
1.118	Over 18 per cent (26,000) reported violent incidents over the last seven years had no record of any action taken by school administration
1.122	School staff experiencing violence from parents/guardians of students



Reference Guide – Key Findings and Observations (Continued)

Paragraph	Key Findings and Observations
<i>Safety Gaps in School Preparation for Hold-and-Secure and Lockdown Protocols</i>	
1.125	All schools in Nova Scotia are required to have an Emergency Management Plan
1.127	HRCE and CSAP are not tracking trends in lockdown and hold-and-secure incidents
1.129	Some HRCE and CSAP schools lack lockdown policy when students are at recess or lunch
1.130	School emergency plans lack clear communication protocols
1.133	HRCE completing hold-and-secure and lockdown drills as required, while CSAP needs improvement
1.136	Educators in HRCE and CSAP are knowledgeable about procedures for lockdown and hold-and-secure incidents



Recommendations and Responses

Recommendation	Department Response
<p>Recommendation 1.1 We recommend the Department of Education and Early Childhood Development, in consultation with educators, develop a provincewide strategy to address incidents of violence in schools. Elements of the strategy to include:</p> <ul style="list-style-type: none"> - Clearly define what is meant by school violence; - Establish goals, objectives and action plans; - Establish roles and responsibilities at the school, RCE/CSAP and Department level; - Require RCEs and CSAP to verify Occupational Health and Safety Workplace Risk Assessment and Prevention Plans are being completed appropriately by all schools and communicated to all staff; - Assess if and how PowerSchool should be used to collect data on violence in schools; - Establish timelines for the regular analysis of data to inform decisions; - Determine how collected data will be used to assess educator training needs and establish training plans relating to the prevention and addressing of violence; - Require communication of the importance of reporting incidents by all educators. <p style="text-align: right;">See Page 26</p>	<p>Students and staff should experience a positive, safe school environment.</p> <p>EECD has already begun working with partners, Regional Centres for Education (RCEs) and the Conseil scolaire acadien provincial (CSAP) to develop a provincewide strategy on safe and inclusive schools. This work integrates an updated Provincial School Code of Conduct Policy ("the Policy"), a new provincial behaviour strategy and updated Emergency Management Plans.</p> <p>This work includes defining both behaviour that is concerning and school violence. It will outline roles and responsibilities, identify data standards to inform decisions, guide reporting and inform professional learning and training.</p> <p>EECD will establish annual reporting for the RCEs/CSAP to verify completion of Occupational Health and Safety Workplace Risk Assessment and Prevention Plans.</p> <div style="display: flex; align-items: flex-start;"> <div style="margin-right: 10px;">   </div> <div> <p>Department Agrees</p> <p>Target Date for Implementation: December 2024 for completion of Phase 1 (including consultation, strategy drafting)</p> <p>May 2025 for completion of Phase 2 (including piloting, professional learning and training, communications)</p> <p>September 2025 for implementation</p> </div> </div>

Recommendations and Responses

Recommendation	Department Response
<p>Recommendation 1.2 We recommend the Department of Education and Early Childhood Development update the Provincial School Code of Conduct Policy, and as part of the update:</p> <ul style="list-style-type: none"> - Provide guidance on how to manage unacceptable behaviours at different grade levels including age-appropriate consequences; - Provide guidance to educators if unacceptable behaviours of a student escalate, including the supports and actions that can be taken; - Review the categories of unacceptable behaviours; - Establish how the Provincial School Code of Conduct Policy will be communicated with students and parents/guardians on a regular basis; - Review what policies are needed to support the Provincial School Code of Conduct Policy to provide educators with more detailed guidance on how to manage unacceptable behaviours; - Provide guidance to staff in schools on how incidents of inappropriate parent/guardian behaviours should be responded to and how they will be followed up on. <p style="text-align: right;">See Page 27</p>	<p>EECD has already begun working with partners, Regional Centres for Education (RCEs) and the Conseil scolaire acadien provincial (CSAP) to develop a provincewide strategy on safe and inclusive schools. This work integrates an updated Provincial School Code of Conduct Policy ("the Policy"), a new provincial behaviour strategy and updated Emergency Management Plans.</p> <p>This work will provide guidance to staff on appropriate responses in the case of escalating unacceptable student behaviours. Further, it will provide guidance on age-appropriate consequences.</p> <p>The strategy will include the development and implementation of guidance documents to address unacceptable behaviours across all grade levels.</p> <p>The RCEs/CSAP will be required to communicate the Policy to students and parents/guardians annually.</p> <div style="display: flex; align-items: flex-start;"> <div style="margin-right: 10px;">   </div> <div> <p>Department Agrees</p> <p>Target Date for Implementation: December 2024 for completion of Phase 1 (including consultation, strategy drafting)</p> <p>May 2025 for completion of Phase 2 (including piloting, professional learning and training, communications)</p> <p>September 2025 for implementation</p> <p>Teacher Assistant Guidelines targeted for release by June 2025</p> </div> </div>

Recommendations and Responses

Recommendation	Department Response
<p>Recommendation 1.3 We recommend the Department of Education and Early Childhood Development improve violence in schools data collection, accuracy and reliability of incidents by:</p> <ul style="list-style-type: none"> - Establishing processes to verify data is accurate and reliable; - Clarifying how to categorize an incident; - Clarifying the level of detail required when reporting an incident; - Requiring “action taken” to be filled out for all incidents; - Creating a standardized process for how violent incidents experienced by Teacher Assistants should be reported; - Reinforcing requirement for educators to report all incidents; - Adding the ability to document the name of the impacted individual when reporting an incident; - Adding the ability to capture if the impacted individual of an incident is from a marginalized group; - Defining which types of incidents require a debrief and by whom; - Establishing a tracking mechanism to ensure debriefs are occurring and students and educators are provided with appropriate supports after an incident; - Clarifying how and when to report incidents involving parents and guardians. <p style="text-align: right;">See Page 36</p>	<div style="display: flex; justify-content: space-between;"> <div style="width: 60%;"> <p>EECD has already begun working with partners, Regional Centres for Education (RCEs) and the Conseil scolaire acadien provincial (CSAP) to develop a provincewide strategy on safe and inclusive schools. This work integrates an updated Provincial School Code of Conduct Policy (“the Policy”), a new provincial behaviour strategy and updated Emergency Management Plans.</p> <p>Through this work, we will identify data standards to inform decisions, guide reporting and inform professional learning.</p> <p>Data standards will improve accuracy and reliability including at collection. These will include specific instruction for staff regarding level of detail required when reporting and responding to incidents.</p> <p>The updated Teacher Assistant (TA) Guidelines, anticipated in Fall 2024, include a section titled Safety and Behaviour which outlines how a TA assists with positive behaviour supports and responds when a student has challenges self-regulating their behaviour, including reference to RCE/CSAP reporting processes when they experience harm.</p> </div> <div style="width: 35%; border-left: 1px solid black; padding-left: 10px;"> <p style="text-align: center;"> Department Agrees</p> <p style="text-align: center;"> Target Date for Implementation: December 2024 for completion of Phase 1 (including consultation, strategy drafting)</p> <p>May 2025 for completion of Phase 2 (including piloting, professional learning and training, communications)</p> <p>September 2025 for implementation</p> <p>June 2025 for Teacher Assistant Guidelines</p> </div> </div>

Recommendations and Responses

Recommendation	Department Response
<p>Recommendation 1.4 We recommend the Department of Education and Early Childhood Development require Regional Centres for Education and Conseil scolaire acadien provincial to track incidents of lockdowns and hold-and-secures with details of the nature of the incident and require the Regional Centres for Education and Conseil scolaire acadien provincial to perform regular trend analysis.</p> <p style="text-align: right;">See Page 38</p>	<p>It is a priority of EECD to provide the most current guidance on school safety and emergency management. The <i>School Emergency Management Plan: Provincial Guidelines</i> provide guidance to RCEs/CSAP on school safety and emergency management. Schools conduct drills and execute components of the plan as needed during emergencies.</p> <p>EECD has already begun working with partners, Regional Centres for Education (RCEs) and the Conseil scolaire acadien provincial (CSAP) to develop a provincewide strategy on safe and inclusive schools. This work integrates an updated Provincial School Code of Conduct Policy ("the Policy"), a new provincial behaviour strategy and updated Emergency Management Plans.</p> <p>EECD's updated <i>School Emergency Management Plan: Provincial Guidelines</i> will include tracking isolation incidents (both lockdowns and hold-and-secures).</p> <p>Data will be analyzed annually to inform decisions and training.</p> <p style="text-align: right;">See Page 38</p>
<p>Recommendation 1.5 We recommend the Department of Education and Early Childhood Development verify school Emergency Management Plans include all essential components of the Emergency Management for Nova Scotia Schools Provincial Guidelines.</p> <p style="text-align: right;">See Page 39</p>	<p>EECD has already begun working with partners, Regional Centres for Education (RCEs) and the Conseil scolaire acadien provincial (CSAP) to develop a provincewide strategy on safe and inclusive schools. This work integrates an updated Provincial School Code of Conduct Policy ("the Policy"), a new provincial behaviour strategy and updated Emergency Management Plans.</p> <p>Protocols and guidelines related to school safety and emergency management will clarify responsibilities for establishing plans, tracking, and reporting drills and incidents.</p> <p style="text-align: right;">See Page 39</p>

Questions Nova Scotians May Want to Ask

1. Why doesn't the Department of Education and Early Childhood Development have a strategy to address violence in schools?
2. Is the Department of Education and Early Childhood Development providing educators with adequate training to manage violence in schools?
3. Does the Department of Education and Early Childhood Development know why reported incidents of violence in schools have increased?
4. How will the Department of Education and Early Childhood Development improve the culture of preventing and addressing violence in schools?

1 Preventing and Addressing Violence in Nova Scotia Public Schools

Background

- 1.1 There are seven Regional Centres for Education (RCEs) in Nova Scotia as well as a francophone board Conseil scolaire acadien provincial (CSAP). The seven RCEs have schools within defined geographical regions, while CSAP has schools across the province.
- 1.2 The *Education Act* (the Act) states the Department can establish a provincial school code of conduct which contains provisions for student conduct and consequences for what are referred to as unacceptable behaviours.
- 1.3 The Provincial School Code of Conduct Policy (Code of Conduct) applies to all students, parents/guardians of students and any persons working in schools who have contact with students and staff.
- 1.4 The Code of Conduct describes the following 20 categories of unacceptable behaviours:
 - Bullying, cyberbullying, discriminatory behaviour, illegal activity, insubordination, misuse of network or online resources, physical violence, racist behaviour, repeated tobacco or e-cigarette use, sexual assault, sexual harassment, sexual misconduct, significant disruption to school operations, use or possession of alcohol, use or possession of drug-related paraphernalia, use or possession of illegal drugs, weapons possession, weapons use, vandalism, and verbal abuse.

Defining violence in schools

- 1.5 The United Nations Educational, Scientific and Cultural Organization (UNESCO) defines violence in schools as including physical, psychological, and sexual violence.
- 1.6 We compared the categories of unacceptable behaviours from the Code of Conduct with the UNESCO definition and focused our work on the following 11 categories we concluded would fall within this definition:
 - Bullying, cyberbullying, discriminatory behaviour, physical violence, racist behaviour, sexual assault, sexual harassment, sexual misconduct, verbal abuse, weapons use, and weapons possession.
- 1.7 We refer to incidents under these 11 categories in our report as “violent incidents,” or “violence in schools” while acknowledging the Department refers to all code of conduct violations as “unacceptable behaviours.” It is also important to acknowledge a violent act does not necessarily indicate there was intent to harm when the act was committed and there are many factors, including special needs of students, which need to be considered when looking at reported incidents.

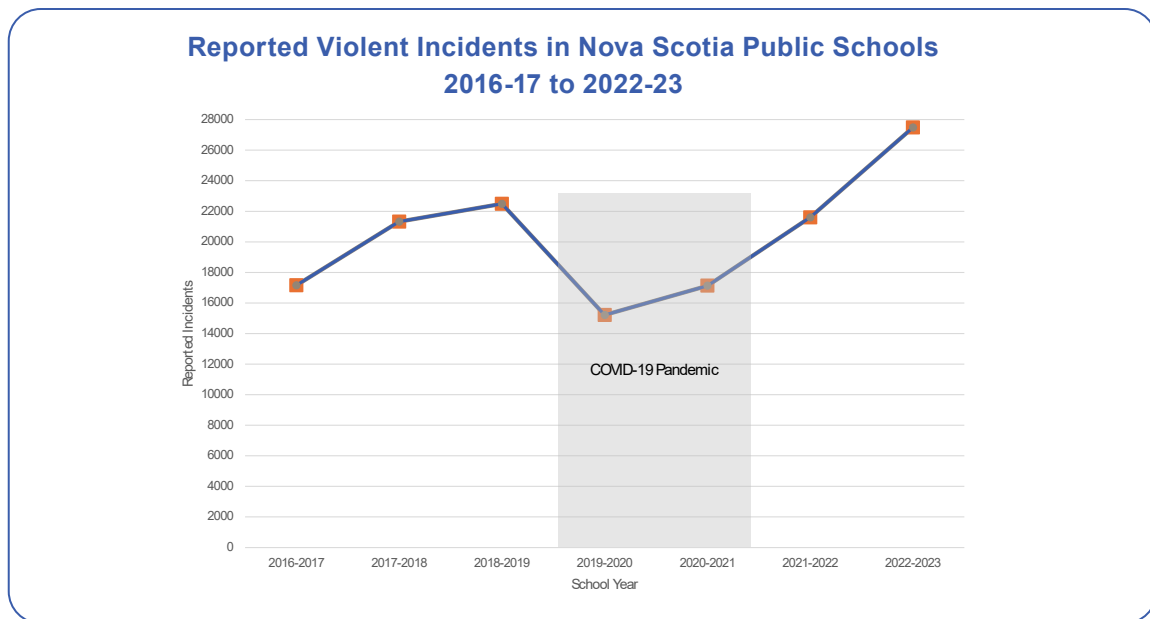
School violence incidents are recorded in PowerSchool system

- 1.8 All unacceptable behaviours, which would include incidents that may be violent, are to be recorded by educators in PowerSchool, a system used by all RCEs and CSAP. The system also captures other student information including attendance and grades.
- 1.9 All teachers have access to PowerSchool, as does school administration which includes the principal and the vice principal(s). However, Teacher Assistants (TAs), also referred to as Education Program Assistants in HRCE, do not have access to PowerSchool. Therefore, if they want to report an incident, they need to ask a teacher or administrator to do so on their behalf.
- 1.10 A TA assists with the teaching and education of students with special needs by providing support with personal care, behaviours, and instructional programs under the direction of a teacher and the school student planning team.
- 1.11 We refer to *educators* in this report, which for the purposes of this audit refers to all staff who work with students in schools including principals and vice principals; classroom teachers; learning centre teachers; teacher assistants and other school support staff who work directly with students.
- 1.12 There are a variety of support staff at the RCEs and CSAP involved with maintaining safety in schools. HRCE has, among various positions, an Equity Consultant, Behavioural Specialists, and a Safe and Inclusive Schools Consultant. These staff are based at the RCE level and are called into schools on an as-needed basis to assist with specific students or challenges. CSAP has similar positions. There are also human resources staff at the HRCE and CSAP who provide support to staff in schools who have been injured on the job.
- 1.13 While all educators, support staff, and other positions contribute to preventing and addressing violence in schools, there is no one position at the Department, HRCE or CSAP responsible for overseeing violent incidents in schools.



PowerSchool data shows 60 per cent increase in reported school violence incidents over the last seven years

- 1.14 In the past seven years, the number of reported violent incidents increased by 60 per cent from 17,000 to 27,000, with expected lower incident numbers when students were not in school full time during the COVID-19 pandemic.



Source: Office of the Auditor General of Nova Scotia; Department of Education and Early Childhood Development

- 1.15 Although enrolment may be a factor in the number of reported incidents, provincial enrolment has only increased by nine per cent over the past seven years. Enrolment in HRCE and CSAP has grown by 17% and 16% respectively over the same time period.

Audit Approach

- 1.16 Our report conclusions are based on our review of policies and procedures; interviews with departmental staff, HRCE and CSAP management as well as school staff; responses to a provincewide survey we conducted and our detailed work at the seven schools within HRCE and CSAP. Within HRCE and CSAP, we met with various management positions to gain an understanding of how violence in schools is managed.
- 1.17 In addition to reviewing work being done at the Department level, we visited seven schools and performed detailed work at the Halifax Regional Centre for Education (HRCE) and Conseil scolaire acadien provincial (CSAP). We focused on HRCE and CSAP and specific schools based on reported violent incidents in the 2022-23 school year relative to school enrolment, as the table below shows. In selecting the schools to visit within the HRCE and CSAP, we considered location, enrolment, grade levels within the school and number of reported violent incidents. Roughly half of the reported incidents in 2022-23 are from HRCE, as expected given that it is the most highly populated area of the province.

2022-23 School Enrolment and Reported Violent Incidents

	School Enrolment	Reported Violent Incidents	Incidents as a percentage of Enrolment	Rank
Conseil scolaire acadien provincial	6,606	1,907	28.87%	1
Halifax Regional Centre for Education	56,686	14,456	25.50%	2
Cape Breton-Victoria Regional Centre for Education	12,732	2,542	19.97%	3
Annapolis Valley Regional Centre for Education	13,698	2,557	18.67%	4
South Shore Regional Centre for Education	6,556	1,124	17.14%	5
Chignecto-Central Regional Centre for Education	20,379	3,157	15.49%	6
Strait Regional Centre for Education	6,292	923	14.67%	7
Tri-County Regional Centre for Education	6,172	820	13.29%	8
Total	129,121	27,486		

Source: Office of the Auditor General of Nova Scotia; Department of Education and Early Childhood Development

- 1.18 We conducted a voluntary provincewide survey of all school staff in the province about preventing and addressing violence in Nova Scotia public schools. The survey was sent to principals, vice principals, teachers, teacher assistants and any other staff who work in schools such as student support staff. We received over 5,200 responses to our survey, which represents almost 28% of over 18,000 recipients.
- 1.19 We formed our conclusions in this report based on our review of policies and procedures; interviews with staff at the Department, HRCE and CSAP management as well as school staff; responses to the survey and our detailed work at the seven schools within HRCE and CSAP.

Pervasive School Violence Requires Strong Leadership and Community Commitment to Ensure Safe Learning Environments

School violence can be defined in a variety of ways

- 1.20 We found numerous definitions of school violence from key organizations including UNESCO (as mentioned above) and the World Health Organization (WHO). We also found Governments in Quebec and Ontario have definitions of school violence.
- 1.21 The World Health Organization states preventing and responding to violence in schools can improve educational outcomes in children and help them achieve their educational targets¹. The WHO states many of the life skills taught in violence prevention such as resolving conflict, managing emotions and communication, are the same skills that help children succeed in school and can protect them from other issues in the future affecting learning like alcohol and drug use². Therefore, it is important the Department provide direction, policy and support to the RCEs and CSAP for preventing and addressing school violence.

¹ <https://iris.who.int/bitstream/handle/10665/324930/9789241515542-eng.pdf?sequence=1>

² <https://iris.who.int/bitstream/handle/10665/324930/9789241515542-eng.pdf?sequence=1>

1.22 In addition, the *Quebec Education Act* defines violence in schools as “any intentional demonstration of verbal, written, physical, psychological or sexual force which causes distress and injuries, hurts or oppresses a person by attacking their psychological or physical integrity or well-being, or their rights or property.”



1.23 The Ministry of Education for Ontario also defines school violence as *possessing a weapon, including possessing a firearm, physical assault causing bodily harm requiring medical attention, sexual assault, robbery, using a weapon to cause or to threaten bodily harm to another person, extortion or hate and/or bias-motivated occurrences.*

1.24 Although the Department uses the term “unacceptable behaviours” in their Code of Conduct, it is not a clear definition of what is meant by violence in schools.

1.25 The Code of Conduct lists 20 unacceptable behaviours, of which 11 we have concluded would fall under the UNESCO definition of school violence. Separating out these types of incidents and defining what constitutes school violence is important because without a formal definition, interpretation can vary and could result in an inconsistent approach to addressing violent incidents.

The Department does not have a provincewide strategy to address violence in schools

1.26 The WHO speaks to the importance of a cohesive approach to preventing violence in schools. Staff and students within schools need the same vision to reduce violence. Also, school administration, teachers, students, parents and the community all need to work together towards shared goals.

1.27 Addressing violence in schools can be complex. Students have diverse learning needs and come from a variety of backgrounds, both of which could impact the approach to behavioural challenges.

1.28 These complex challenges point to the importance of a cohesive and well thought out department strategy to address unacceptable behaviours in school. A formal strategy provides clear direction and goals and assures staff and students that the organization has a focus on the topic.

1.29 A formalized strategy and response protocols to address incidents also assures employees there is a focus on the issue and a commitment to making their workplace safe.

1.30 The Department does not have a provincial strategy to address violence in schools. When asked, Department management directed us to the Code of Conduct as the primary tool used to address violence in schools. We discuss the weaknesses of the Code of Conduct later in our report.

1.31 Schools are a workplace for all educators, and they should also be a refuge for students to feel safe from violence. When an educator or student is the victim of violence, the experience can shake the foundation of a school as a safe haven and can result in members of the school community no longer feeling safe. A safe school environment is paramount to a strong learning environment.

1.32 It is also incumbent on an employer, the Department and RCEs/CSAP in this case, to show employees they are making all reasonable efforts to keep their employees safe in the workplace.

Addressing school violence is a shared responsibility

1.33 The WHO also highlights the important influence parents and guardians have on a child’s values, attitudes and behaviours. It speaks to how violence prevention programs in schools may not be

effective if children are exposed to violence in their homes and how they may replicate these behaviours in schools. Therefore, while the Department may put strategies in place to prevent and address violence in schools, parents/guardians also play a key role.

Other Canadian provinces increasing focus to address violence in schools

- 1.34 In 2023, after an increase in acts of violence in Quebec schools, the Ministry of Education in Quebec unveiled a program to prevent and address violence in schools. Also in 2023, the Ontario government announced new funding to help reduce the risk of violence in schools and promote the safety of students and educators. Similar to Quebec, this was announced in response to incidents of violence in schools. Additional resources were added including psychologists, social workers, child/youth workers, as well as more educational assistants to work with students who may require additional supports.
- 1.35 While we can't confirm the effectiveness of these investments, it highlights that other provinces are placing an increased focus on this topic. Increasing school violence is not unique to Nova Scotia.

The Halifax Regional Centre for Education and Conseil scolaire acadien provincial are not complying with OH&S Act Violence in the Workplace Regulations

- 1.36 In Nova Scotia, the *Violence in the Workplace Regulations* are part of the *Occupational Health and Safety (OH&S) Act*. These regulations apply to many sectors, including all schools governed by the *Education Act*.
- 1.37 We found a number of requirements from the *Violence in the Workplace Regulations* are not being adequately addressed by HRCE and CSAP, including:
 - workplace risk assessments and prevention plans not being properly completed by schools or verified as completed by HRCE and CSAP;
 - adequate training not being provided to educators exposed to violence in the workplace; and
 - a lack of documentation of actions taken on reported incidents.

Required Occupational Health and Safety risk assessments need improvement

- 1.38 An OH&S workplace risk assessment involves identifying risks employees face and establishing a prevention plan to make all reasonable efforts to mitigate these risks.
- 1.39 Without identifying employee risks, the employer (HRCE and CSAP in this case) will not have a clear picture of the hazards to mitigate to keep employees safe and are not setting the expectation they value a safe work environment.
- 1.40 HRCE and CSAP both provide a workplace risk assessment template to schools to identify risks educators may face. Some of these risks include:
 - “Are there students whose behaviours have led to workplace violence?”

- “Are employees involved in disciplining staff or students?”
- “Is there likelihood of violence from external or internal groups involved in socially disruptive or illegal behaviours?”

1.41 The risk assessment and prevention plan template indicate risks should be customized by the school, employees affected should be listed, and details of the risk assessment should be communicated to staff, especially those who are potentially affected by the risks. Schools may conclude they feel the risks in the template appropriately cover the risks they face, and if not, they can add additional risks and must document corresponding prevention plans to mitigate the risks. The principal of the school has responsibility for ensuring this plan is reviewed and updated if necessary, as well as being communicated to staff in schools.

1.42 We reviewed the 2022-23 workplace risk assessment and prevention plans for the seven schools in our sample. Five of the schools could not provide us with their 2022-23 plans. For the remaining two schools who did provide their plans, we found they were not fully complete with missing prevention plans for identified workplace risks and a lack of documentation that risks were communicated to affected employees.

1.43 While it was outside of our audit period, we did note that six out of the seven schools completed their 2023-24 risk assessment and prevention plans, but we still found similar weaknesses as noted for the 2022-23 plans.

1.44 Many principals we spoke with in schools indicated they did not have clear guidance on how to assess the risks and fill out the forms which may be contributing to the lack of rigor being put into the process.

Educators indicated training to manage school violence is limited

1.45 Based on the increase in incidents reported by educators in PowerSchool, as well as the results of our provincewide survey and our interviews, we concluded educators in schools in Nova Scotia are at high risk of experiencing violence in the workplace. Sixty-five per cent of educators who responded to our survey indicated they witnessed or experienced violence in schools at least weekly when responding to our provincewide survey, with 31 per cent indicating they experience violence in schools daily.

1.46 Due to the high risk of experiencing violence, we expected to see all educators in schools being offered or required to take training on how to manage violent behaviours.

1.47 More than 70 per cent of educators (seven out of 10), who responded to our provincewide survey reported they do not receive enough training to manage the violence they are experiencing in schools.

1.48 Most educators we spoke with in our sample of schools also felt the training they received is insufficient to manage violent behaviours in schools.

Training to educators to manage school violence varies depending on position and student needs

1.49 In interviews with educators, we were told Teacher Assistants experience violence daily. Our provincewide survey also showed 45 per cent of Learning Centre teachers, Teacher Assistants

and Resource teachers who responded to the survey experience violence on a daily basis. It is important to again acknowledge a violent incident does not necessarily mean there was intent to harm, but we must also acknowledge educators may be experiencing violence in their workplace and, as per the Violence in the Workplace Regulations, an employer has a responsibility to properly train employees to manage risks within their workplace.

- 1.50 The training historically provided by HRCE and CSAP related to school violence is Non-Violent Crisis Intervention (NVCI) administered by the Crisis Prevention Institute (CPI). CPI is an international training organization specializing in person-centred de-escalation and behaviour management programs. The NVCI program has eight modules to allow educators to be provided with the level of training they may need depending on the students they are working with.
- 1.51 The first several modules of NVCI program cover verbal de-escalation training. The remaining modules cover physical holds and other techniques to physically handle a student in crisis.
- 1.52 As described below, in HRCE and CSAP, various portions of the NVCI training are only provided to learning centre teachers and teacher assistants and the level of training is based on the needs of the students they are working with. Classroom teachers are not provided with NVCI training in HRCE (except when requested for special circumstances) or CSAP.

Teacher Assistant training differences between HRCE and CSAP

- 1.53 All Teacher Assistants in HRCE used to be provided with full NVCI training prior to the COVID-19 pandemic but are now only offered the verbal intervention portion of the training. The full training program (verbal and physical intervention) is now only offered to TAs and learning centre teachers when recommended by a behavioural specialist for HRCE and if it is part of the Individual Program Plan for the students they are working with. An Individual Program Plan (IPP) creates individualized outcomes when a student is not able to meet the outcomes in the provincial school curriculum, as well as to assist the student with behaviour challenges.
- 1.54 CSAP provides all TAs with full NVCI training. CSAP's learning centre teachers only receive the verbal portion or full NVCI training when they work with students with certain behaviours.
- 1.55 In reference to challenges of all TAs not having the full NVCI training, we were told there are times when TAs may be off work and others must fill in their place, or a new student with behavioural challenges arrives at a school and a TA is assigned to them.
- 1.56 The below chart summarizes the training provided within HRCE and CSAP:

Non-Violent Crisis Intervention Training Provided				
	Full NVCI (includes Verbal Intervention)		Verbal Intervention	
	HRCE	CSAP	HRCE	CSAP
Teacher Assistants	Depending on needs of students they work with	Yes	Yes	Yes
Learning Centre Teachers	Depending on needs of students they work with	Depending on needs of students they work with	Yes	Depending on needs of students they work with
Classroom Teachers	No*	No	No*	No

Source: Office of the Auditor General of Nova Scotia
*May be provided in special circumstances.

- 1.57 The above chart highlights the inconsistencies in the training being provided to teacher assistants, learning centre teachers and classroom teachers in HRCE and CSAP.
- 1.58 Management at the HRCE told us they are moving away from the physical portion of the NVCI training because of the trauma it can cause for a student and increased risk of injury to the student or educator.
- 1.59 While the most important aspect of a strong safety culture is about the prevention of violent incidents, having specialized training to reflect the many challenges educators are facing would, at the very least, allow educators to feel more prepared to manage incidents when they do occur. It would also be a signal from their employer that they take these issues seriously and value educators' safety.
- 1.60 As discussed later in our report, data should be used to inform decisions about what types of training should be provided to educators. Data can be used in part to determine what training is most appropriate to manage violence in schools. For example, if PowerSchool data shows a marked increase in a particular type of violent incident, training could be provided to educators to give them the tools to know how to address the issues.

Required biennial Provincial School Code of Conduct Policy review overdue by six years

- 1.61 The Code of Conduct, as described earlier, is required to be reviewed every two years, but was last updated in September 2015, and it is now over eight years old. In Fall 2023, the Department announced a review of the Code of Conduct will take place and this work was ongoing at the time of our audit. The Department indicated they expect to release a new Code of Conduct in 2025.

Provincial School Code of Conduct Policy needs improvement

- 1.62 The Code of Conduct defines 20 unacceptable behaviours as well as potential consequences that can be issued. However, there is no link made between which consequences are appropriate for which category of behaviour. There is also no guidance about which behaviours will automatically result in certain consequences, due to the severity of their nature. In order to create an overall change in unacceptable or violent behaviours of students, potential consequences for certain actions must be made clear.

Sixty-one per cent of educators responding to our provincewide survey indicated the Provincial School Code of Conduct Policy does not provide enough support and guidance to manage and respond to violence in schools

- 1.63 Sixty-one per cent of educators who responded to our provincewide survey indicated they do not feel the Code of Conduct provides them with enough support or guidance to manage and respond to violent behaviours in schools. In our visits to schools, educators had similar comments and identified some key challenges with the Code of Conduct including:



- Blanket statements not providing enough clarity on what to do when unacceptable behaviours occur;

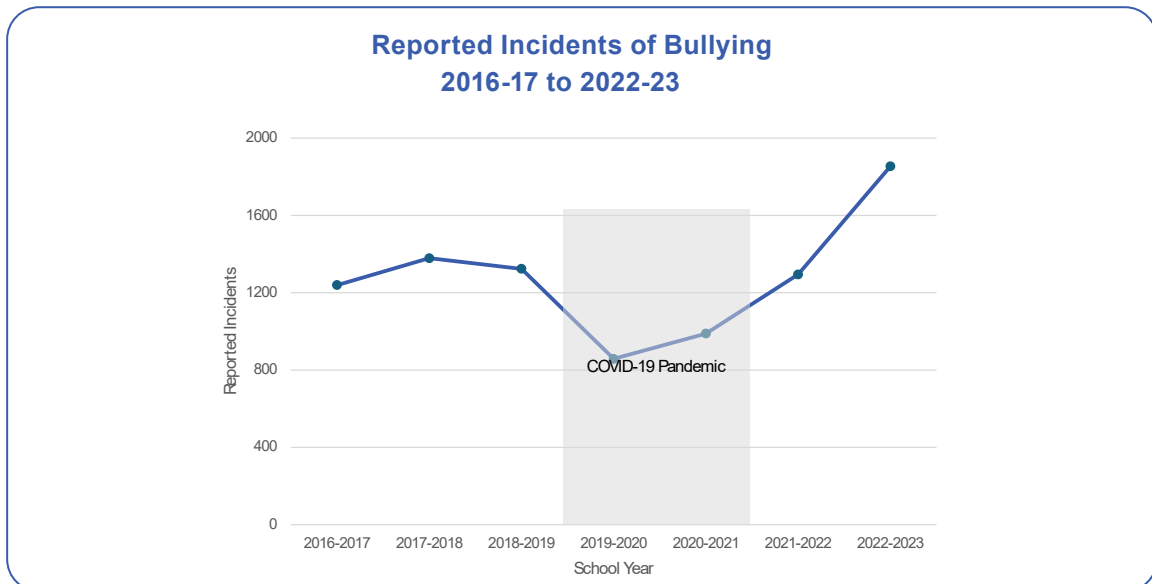
- A lack of guidance of the varying challenges of managing unacceptable behaviours when a student has special learning needs;
- A lack of guidance to address the differences in behaviours at the elementary, junior high and high school levels as well as age-appropriate consequences;
- Categories being too broad, for example, physical violence encompassing an incident of one student pushing another, while at the same time representing more serious incidents such as a physical fight; and
- Difficulty in enforcing consequences.



1.64 The Department has indicated they plan to seek feedback from educators during the review of the Code of Conduct to allow educators who work with students daily to suggest improvements.

No supporting policies for Provincial School Code of Conduct Policy

- 1.65 The Department refers to the Code of Conduct as the primary tool for assisting educators in managing violence in schools. If this is the case, the Code of Conduct needs to provide sufficient guidance and be comprehensive enough to account for complex teaching environments facing educators.
- 1.66 We were told by HRCE management that when the Code of Conduct was put in place in 2015, RCEs/CSAP were told by the Department to rescind all policies that contradict what was covered by the Code of Conduct. The RCEs/CSAP were told the Code of Conduct should be used to govern all issues with unacceptable behaviours, but they were permitted to develop their own policies as long as they do not conflict with or duplicate provincial education policies.
- 1.67 Bullying is an example of a violent behaviour with no specific supporting policy. The chart below shows the increase in reported incidents of bullying over the past seven years:



Source: Office of the Auditor General of Nova Scotia; Department of Education and Early Childhood Development

- 1.68 The province of Ontario has anti-bullying and progressive discipline policies in place for schools. The policies provide clear guidance on the definition of bullying and cyberbullying; the role of parents in preventing and addressing bullying; strategies that can be used by educators; and progressive discipline for instances of bullying segregated by age categories.
- 1.69 There is no similar clear guidance in Nova Scotia on how to manage bullying in schools.
- 1.70 While it is reasonable for the Department to not want to have overlapping or varying contradictory policies in RCEs/CSAP across the province, this example related to bullying highlights that the Code of Conduct may not be prescriptive enough to meet the needs of educators. Educators should have access to detailed guidance that supports the Code of Conduct, so they are confident in preventing and addressing instances of violence.

Various reasons highlighted by educators contributing to the increase in violence in schools

- 1.71 In our interviews with school staff and HRCE and CSAP management, we asked what factors they felt contributed to the increase in violent incidents in schools. The responses included:
- Lack of enforcement of consequences by school administration;
 - Not enough support for students who have special learning needs;
 - Teachers no longer monitoring hallways, resulting in fewer connection points with students;
 - The sheer number of students within a school;
 - Race and human rights challenges;
 - Insufficient roles in schools to help educators manage behaviours; and
 - A lack of support for students who have English as a second language, which can result in behaviour challenges if students are struggling to understand classroom instruction.

Educators experiencing challenges with implementing the Inclusive Education Policy

- 1.72 In 2018, a report titled Students First was published by the Commission of Inclusive Education (the Commission) about the state of inclusive education in Nova Scotia as well as recommendations for change. Members of the Commission were appointed by the government and the Nova Scotia Teachers' Union. The purpose of this work was to examine the inclusive education model in place at the time and identify challenges in implementing inclusive education. After the release of this report and based on feedback received from educators during the process, the Inclusive Education Policy was put into place approximately one year later (2019). This policy promotes the principle that students should receive their education within a classroom of students a similar age, with appropriate supports put in place to facilitate this as much as possible.
- 1.73 At the schools we visited, a common theme in our interviews was the lack of proper support for educators to manage the diverse needs within a typical classroom. We were told in our discussion with educators that students often act out in school when their needs are not being met.

1.74 In the 2018 report, educators identified various challenges to implementing inclusive education including:

- Feeling unprepared by their Bachelor of Education programs to face the realities of implementing inclusive education in the classroom;
- A lack of professional development opportunities to increase their ability and confidence to support inclusive education in the classroom including specialized learning for behaviour intervention;
- Two-thirds of educators surveyed indicated there were too few TAs, resource teachers, guidance counsellors, speech language pathologists and school psychologists to meet the demands of student needs in the system and those already in these roles were experiencing burnout;
- Challenges within the parent-educator relationship;
- The increase in the disruption caused by poor student behaviour was one of the most difficult issues in the classroom; and
- A growing number of students with complex needs, including students who have witnessed or experienced trauma.

1.75 The Department indicated they have made increases in certain positions to support the implementation of the Inclusive Education Policy. While we have not audited these figures, we were informed the number of full time equivalent (FTE) Teacher Assistant positions grew from 1,772 in 2016-17 to 2,635 in 2022-23, an increase of 49 per cent. Additionally, FTE Learning Centre Teacher and Resource Teacher positions went from 902 in 2016-17 to 1,034 in 2022-23, an increase of 15 per cent.

1.76 Educators we interviewed identified similar current challenges in their workplace. Therefore, despite the Department's efforts to increase resources to support inclusive education over the past seven years, educators are still experiencing similar challenges first identified in 2018.

Recommendation 1.1

We recommend the Department of Education and Early Childhood Development, in consultation with educators, develop a provincewide strategy to address incidents of violence in schools. Elements of the strategy to include:

- Clearly define what is meant by school violence;
- Establish goals, objectives and action plans;
- Establish roles and responsibilities at the school, RCE/CSAP and Department level;
- Require RCEs and CSAP to verify Occupational Health and Safety Workplace Risk Assessment and Prevention Plans are being completed appropriately by all schools and communicated to all staff;
- Assess if and how PowerSchool should be used to collect data on violence in schools;
- Establish timelines for the regular analysis of data to inform decisions;
- Determine how collected data will be used to assess educator training needs and establish training plans relating to the prevention and addressing of violence; and
- Require communication of the importance of reporting incidents by all educators.

Department of Education and Early Childhood Development response: Students and staff should experience a positive, safe school environment.

EECD has already begun working with partners, Regional Centres for Education (RCEs) and the Conseil scolaire acadien provincial (CSAP) to develop a provincewide strategy on safe and inclusive schools. This work integrates an updated Provincial School Code of Conduct Policy (“the Policy”), a new provincial behaviour strategy and updated Emergency Management Plans.

This work includes defining both behaviour that is concerning and school violence. It will outline roles and responsibilities, identify data standards to inform decisions, guide reporting and inform professional learning and training.

EECD will establish annual reporting for the RCEs/CSAP to verify completion of Occupational Health and Safety Workplace Risk Assessment and Prevention Plans. Target Date: December 2024 for completion of Phase 1 (including consultation, strategy drafting); May 2025 for completion of Phase 2 (including piloting, professional learning and training, communications); September 2025 for implementation.

Recommendation 1.2

We recommend the Department of Education and Early Childhood Development update the Provincial School Code of Conduct Policy, and as part of the update:

- Provide guidance on how to manage unacceptable behaviours at different grade levels including age-appropriate consequences;
- Provide guidance to educators if unacceptable behaviours of a student escalate, including the supports and actions that can be taken;
- Review the categories of unacceptable behaviours;
- Establish how the Provincial School Code of Conduct Policy will be communicated with students and parents/guardians on a regular basis;
- Review what policies are needed to support the Provincial School Code of Conduct Policy to provide educators with more detailed guidance on how to manage unacceptable behaviours; and
- Provide guidance to staff in schools on how incidents of inappropriate parent/guardian behaviours should be responded to and how they will be followed up on.

Department of Education and Early Childhood Development response: EECD has already begun working with partners, Regional Centres for Education (RCEs) and the Conseil scolaire acadien provincial (CSAP) to develop a provincewide strategy on safe and inclusive schools. This work integrates an updated Provincial School Code of Conduct Policy (“the Policy”), a new provincial behaviour strategy and updated Emergency Management Plans.

This work will provide guidance to staff on appropriate responses in the case of escalating unacceptable student behaviours. Further, it will provide guidance on age-appropriate consequences.

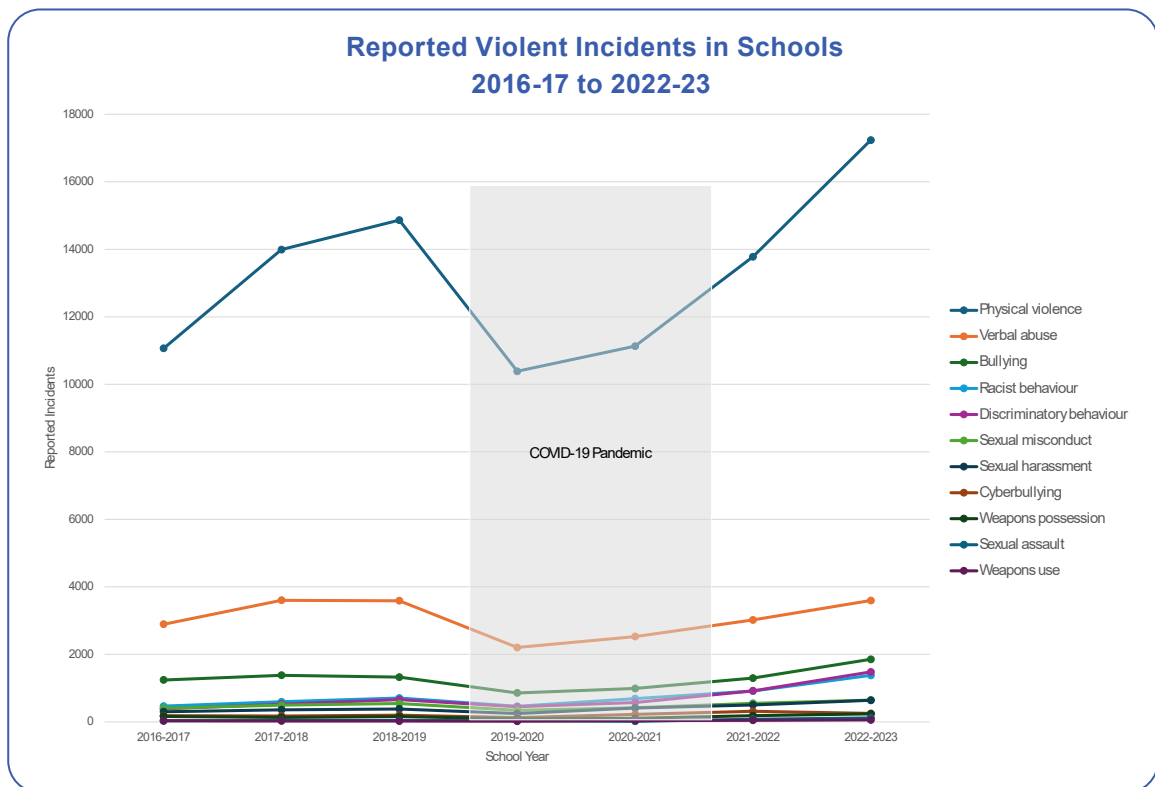
The strategy will include the development and implementation of guidance documents to address unacceptable behaviours across all grade levels.

The RCEs/CSAP will be required to communicate the Policy to students and parents/guardians annually. Target Date: December 2024 for completion of Phase 1 (including consultation, strategy drafting); May 2025 for completion of Phase 2 (including piloting, professional learning and training, communications); September 2025 for implementation.

Data on Violent Incidents Underreported and Unreliable

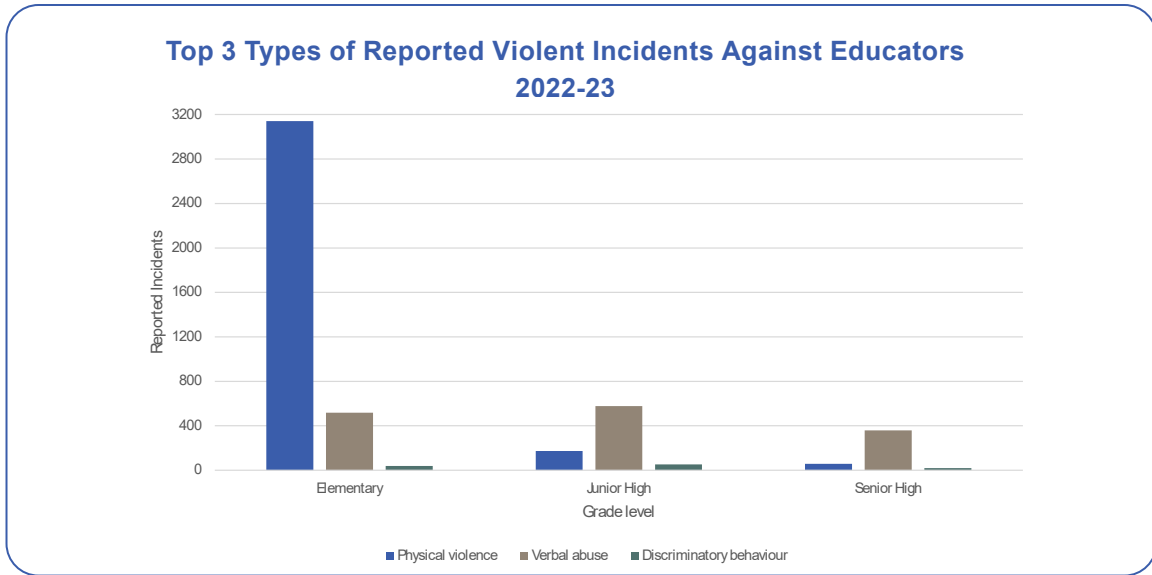
PowerSchool data shows increasing trend in reported school violence

- 1.77 The WHO outlines the importance of collecting data on violence in schools and monitoring changes over time. It highlights that data can help educate decision makers about how many individuals are affected by violence, the characteristics of those most affected, the context, location and timing of the violence, and the identification of the perpetrators. If this information is not available or monitored, the Department could be making biased or false assumptions about the nature of the violence. Doing so could mean the resources of the Department are not directed to the right priorities to address violence.
- 1.78 We obtained data from PowerSchool of reported incidents for the past seven school years under the 11 categories previously noted. The Department indicated the PowerSchool program was purchased and then customized for the Department’s needs.
- 1.79 The following table shows the increasing trend in reported violent incidents over the past seven years:



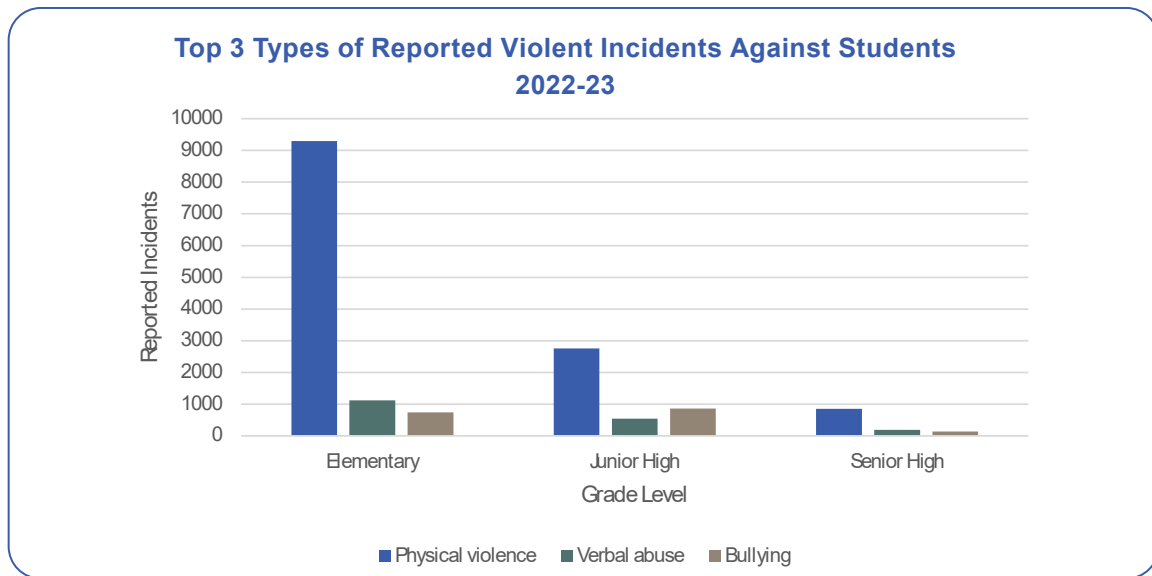
Source: Office of the Auditor General of Nova Scotia; Department of Education and Early Childhood Development

- 1.80 The following two charts show the most prevalent types of incidents depending on whether the impacted individual was an adult or student as well as the grade level for the 2022-23 school year.
- 1.81 The first chart highlights at the elementary level, educators experience physical violence most often whereas verbal abuse is the most prevalent violent act against educators at the junior high and high school level. We were told physical violence is more prevalent in elementary school because children in these grades are still learning to regulate their behaviour.



Source: Office of the Auditor General of Nova Scotia; Department of Education and Early Childhood Development

1.82 The next chart shows, when a student is the impacted individual, physical violence is the most prevalent in all grade levels. Students in elementary school in Nova Scotia experienced almost 10,000 violent incidents in the 2022-23 school year. It is important to also note, which we discuss later in the report, while an incident may have been reported as physical violence, there may be other factors to the incident such as bullying, discriminatory or racist behaviour, among others.



Source: Office of the Auditor General of Nova Scotia; Department of Education and Early Childhood Development



The Department not using incidents reported in PowerSchool to assess overall extent of violence against educators in the workplace

1.83 The Department informed us the purpose of reporting incidents in PowerSchool is to report and correct unacceptable behaviours from students and the program is not intended to track incidents of workplace violence against educators.

- 1.84 However, when reporting an incident in PowerSchool, the author can indicate if the impacted individual was a student or an adult, so the system can gather information about violence and other unacceptable behaviours experienced by educators.
- 1.85 We do not question the validity of using the system to focus on changing a student's behaviour. However, failing to use the information in the system to also monitor incidents against educators and recognize these incidents as violence in a workplace creates a significant gap in knowledge for the Department. With better information, the Department could better fulfill its responsibilities under the OH&S Violence in the Workplace Regulations.

The Department inappropriately relying on Occupational Health and Safety function at RCEs and CSAP to track violence in the workplace

- 1.86 Department management indicated that instead of using the data in PowerSchool to monitor violence against educators, they expect it to be tracked by the OH&S function at RCEs and CSAP.
- 1.87 At HRCE, there are up to three steps educators must take if they experience a violent incident in the workplace:
- Report the incident in PowerSchool;
 - Complete and send an OH&S incident form if there were "hazardous conditions, injury, accident or illness" in the workplace; and
 - If injured, complete form (which depends on the role of the educator: teacher, teacher assistant, etc.) to initiate workplace injury processes.
- 1.88 In comparison, CSAP does not have an OH&S incident form. Instead, educators report a violent incident in PowerSchool and then if they feel the situation warranted it, can then initiate the formal workplace injury reporting processes.
- 1.89 Based on the results of our provincewide survey, the process of when and how to report an incident to OH&S in HRCE is not clear to educators. The educators from HRCE who responded to our provincewide survey showed that 43 per cent of those who responded had been made aware of the OH&S Incident Form. Further, 29 and 27 per cent of HRCE respondents, respectively, had been made aware of when to use the form and who to submit it to.
- 1.90 There is a clear disconnect between the Department's expectation that the OH&S system within an RCE is capturing all violent incidents, when we see how many more violent incidents are reported in PowerSchool.
- 1.91 We reviewed the number of OH&S Incident Forms submitted in HRCE in 2022-23 – there were 835. This figure includes not only violent incidents but also hazards such as falls or slips unrelated to student behaviour. In PowerSchool, for the same period, there were almost 3,000 violent incidents against adults reported, illustrating there are more than three times the number of violent incidents reported in PowerSchool than were reported through the OH&S process. This demonstrates the Department data on workplace violence using the OH&S process is missing several times the number of incidents occurring in the workplace.

The Department does not regularly review or analyze incident data in PowerSchool for trends

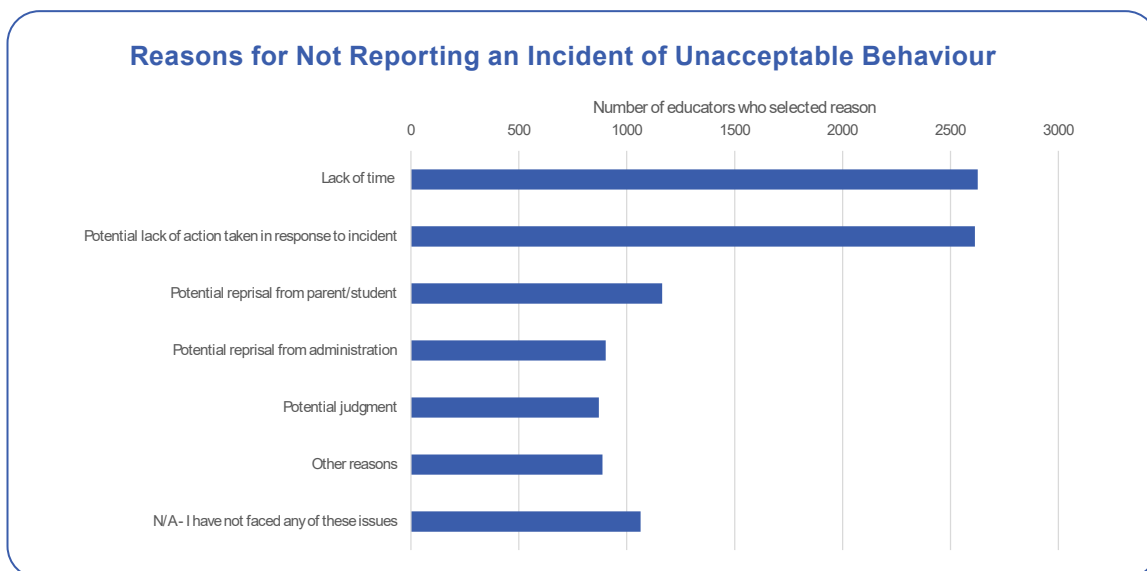
- 1.92 Given the amount of available data in PowerSchool on incidents occurring in schools and based on clear guidance from reputable organizations like the WHO, we would have expected the Department would regularly review the data to identify behavioural trends in schools. RCEs are not required to report to the Department as the Department has direct access to the system.
- 1.93 We were informed by the Department that it does not regularly review the data for trends, but instead extracts data on an as-needed basis. The Department did indicate as a result of the current review of the Code of Conduct, it began conducting extensive trend analyses in late 2023.

 **No regular review of trends of violent incidents by Halifax Regional Centre for Education and Conseil scolaire acadien provincial**

- 1.94 While HRCE management said it had extensive PowerSchool incident data analytics prepared monthly and indicated it uses this data to address issues, it was not able to provide us with evidence of review of this data. CSAP management does not review trends in PowerSchool incident data other than monitoring suspensions.
- 1.95 RCEs and CSAP should take a proactive approach to identify red flags in unacceptable behaviours at schools before the behaviour becomes entrenched in the school climate. Reviewing trends helps management understand what types of violence are the most common in certain schools, which would allow the RCE and CSAP to better allocate resources where they are needed.

 **Educators indicated a variety of reasons for not reporting incidents**

- 1.96 Many of the educators we spoke with indicated they often did not report incidents for a variety of reasons. The most frequently noted reasons, in both our interviews and in responses to our provincewide survey, were a lack of time and the potential lack of action taken after reporting the incident. Other reasons included potential reprisal from parent or student, administration; or potential judgment by others for reporting the incident.
- 1.97 The following chart shows the top reasons why educators who responded to our provincewide survey are not always reporting incidents in PowerSchool. Educators were able to select more than one response.



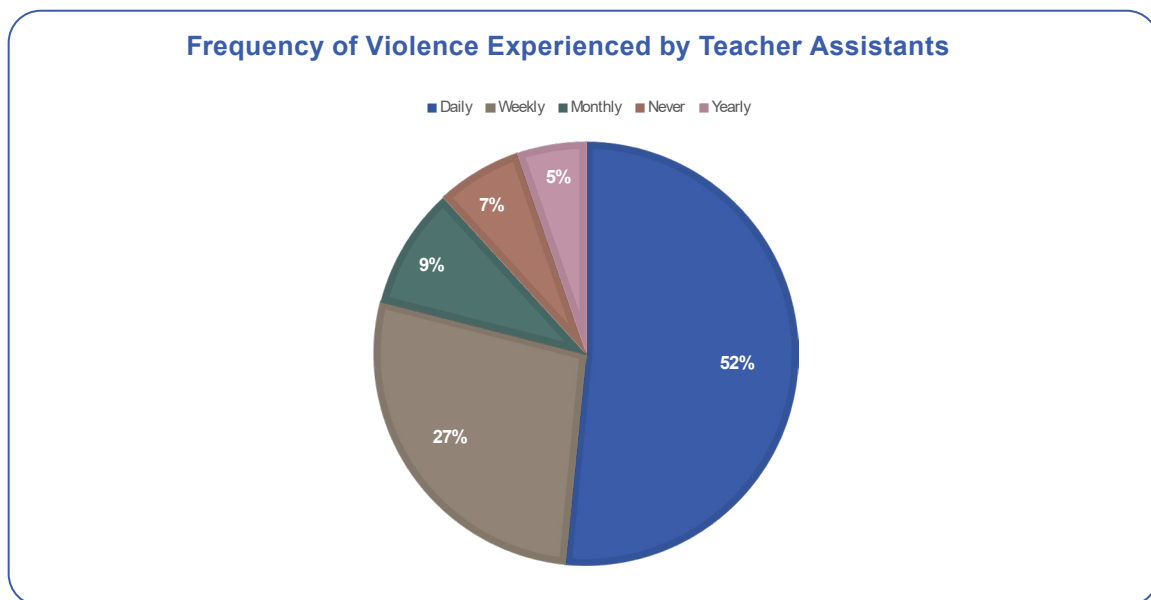
Source: Office of the Auditor General of Nova Scotia

1.98 We note our survey results indicated, for educators that reported an incident, 49 per cent responded school administration either did or somewhat followed up on the incident.

Teacher Assistants do not have access to PowerSchool to report incidents

1.99 School administrators and teachers within a school have access to PowerSchool. TAs do not have access to PowerSchool to report incidents, despite working with students who may have challenging behaviours.

1.100 When we asked TAs if they requested incidents to be reported on their behalf, some indicated they often made the decision to not report incidents, because they would have to ask someone to do this for them. They also indicated often their entire workday was comprised of incidents, and it would be difficult to have them all reported. The following chart shows how often teacher assistants who responded to our provincewide survey indicated they are experiencing violence in the workplace, which highlights the importance of capturing the incidents TAs are experiencing:



Source: Office of the Auditor General of Nova Scotia

1.101 Not providing TAs with a standardized process to report incidents, whether it be in PowerSchool or another method, is likely resulting in the number of incidents being lower than what is actually occurring at a school. At the very least, trends related to specific students should be tracked to ensure the student receives the types of supports they need, and so the TAs are being properly supported in their role.

Educators being challenged on reporting incidents by school administration

1.102 In our interviews with school staff, some teachers indicated they have been challenged in the past by school administrators on the severity of an incident reported by the teacher. We were also told of incidents being removed from the PowerSchool system by the school administration.

1.103 While the administration may have good intentions in adjusting or removing incidents from the system, having a culture of preventing and addressing violence in schools means those who are experiencing and reporting incidents need to feel safe they will not be challenged in their lived

experience of the incident. Adjusting or removing an incident also does a disservice not only to the student who committed the act, but also any student or educator who was the impacted individual of the incident. Students who were impacted may be made to feel as though nothing will be done in future incidents which breeds a lack of faith in the system.

- 1.104 School administrators need to feel assurance they will be supported by their superiors at the RCEs and CSAP if, for example, there is a particularly serious incident reported at their school or an increase in incidents reported at their school in general.

Some educators only reporting incidents when seeking additional resources

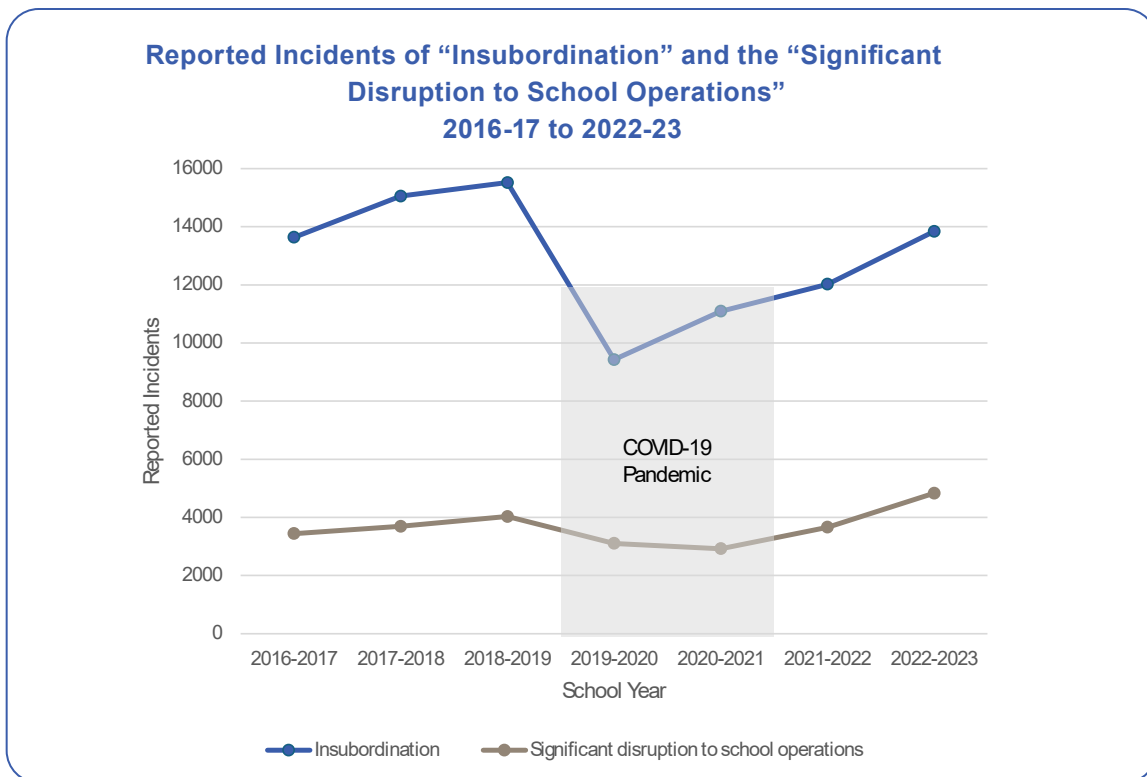
- 1.105 Some teachers indicated they only reported incidents in PowerSchool when they were seeking additional resources to help manage challenging students. Teachers indicated after they received the needed support (such as a TA), they would often stop reporting incidents about the specific student.
- 1.106 Incidents should continue to be reported as they occur, otherwise the school and RCEs and CSAP will not have accurate information about the student and also about what the teacher may be continuing to experience even after additional supports may have been put in place.

Educators indicate little to no training on how and when to report incidents in PowerSchool

- 1.107 Almost all of the teachers we spoke with indicated having no training on how to use PowerSchool for reporting incidents. They also indicated there was no training on when to report an incident and how to categorize it. Recording the same type of incident under consistent categories is important for the reliability of the data because it validates the number of incidents recorded in that category.
- 1.108 In our provincewide survey of educators, we asked educators if they have been provided with training on how to report an incident in PowerSchool, how to categorize it and when to report one. Results showed only 36 per cent of respondents received training on how to report an incident in PowerSchool. More specifically, only 20 per cent and 32 per cent indicated they were given training on how to categorize an incident and when to report one, respectively.

Our testing found some incidents could be reported under multiple categories

- 1.109 When selecting our 11 incident categories, there were two categories with a significant number of incidents reported under them but we determined did not fall under the definition of school violence. These were “insubordination” and “significant disruption to school operations.”
- 1.110 The following graph shows the reported incidents of insubordination and significant disruption to school operations. The graph highlights the significant number of insubordination incidents being reported consistently over the past seven years.



Source: Office of the Auditor General of Nova Scotia; Department of Education and Early Childhood Development

- 1.111 Due to the number of reported incidents in these categories, we tested a sample to determine if the reported incidents appeared to be accurately reported under these categories. We found 23 per cent of incidents, based on the details reported, had violent components to them and could have fallen under, for example, physical violence. An example would be when a student did not follow a teacher’s instructions and threw an object at the teacher.
- 1.112 Some incidents may include aspects of several categories, but PowerSchool does not allow for the selection of more than one category to report an incident. The above examples highlight the importance of having clear guidance for educators on how to categorize a reported incident.

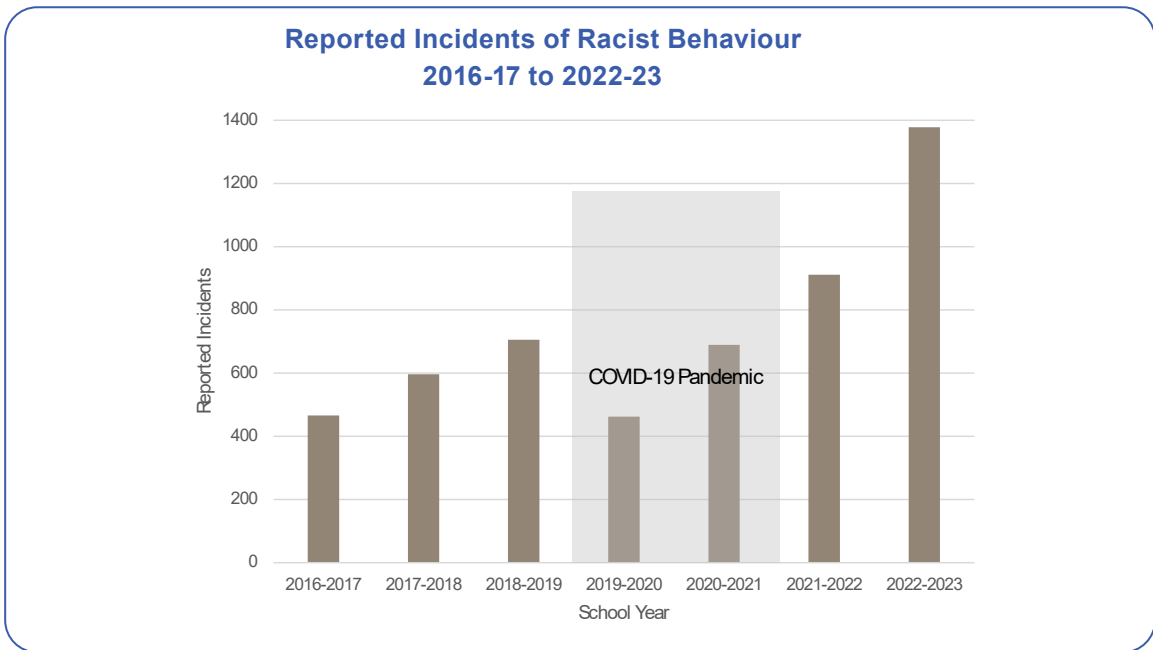


No method to track repeated instances of violence against the same student or educator

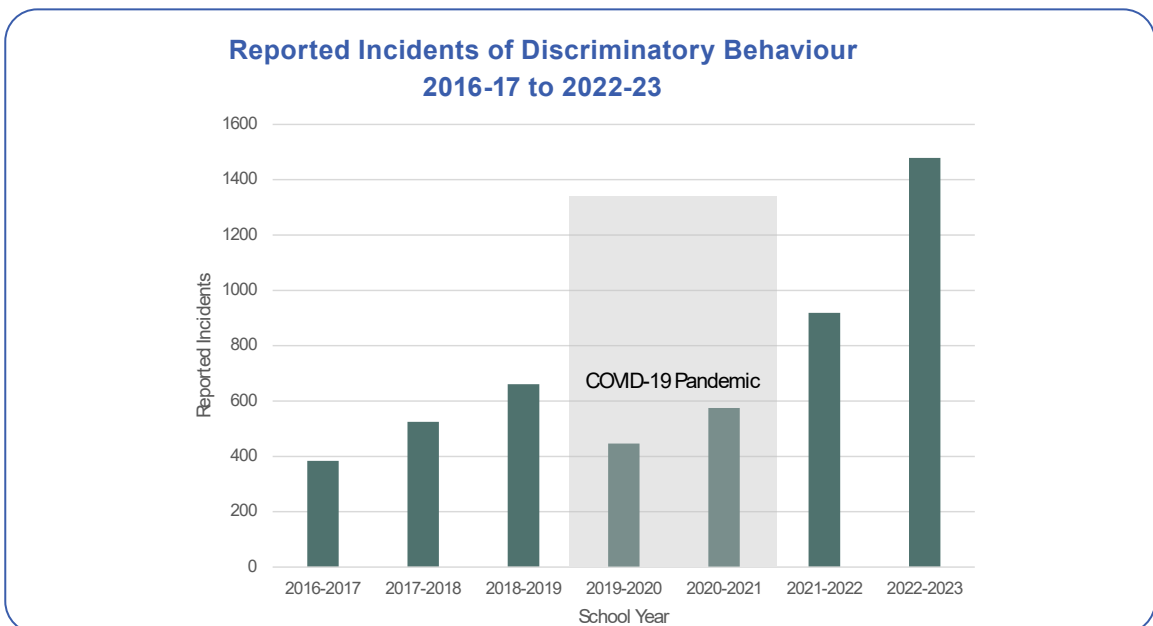
- 1.113 PowerSchool does not have a method for tracking whether a particular student or educator is repeatedly impacted by school violence.
- 1.114 Tracking this kind of information would allow the school to know if a student is, for example, being bullied repeatedly or if an educator is experiencing repeated violence in their workplace. This data provides information to the RCE and CSAP to help determine what action may need to be taken for the safety of students and staff.
- 1.115 PowerSchool also does not allow for indicating whether the student who was the impacted individual had special needs, was a visible minority, their gender or their name. All of this information can be used to make decisions on where supports are needed within a school or an RCE and CSAP as a whole.

1.116 HRCE recently created an Attack on Identity form, used to identify if racist or discriminatory behaviour was the root cause of an incident to determine if there is a trend or need at a specific school for extra support from their Equity Consultant. This form is filled out in addition to reporting the incident in PowerSchool. Some school staff we spoke with found this process redundant as it required reporting the same incident twice. HRCE indicated they created this form to make up for PowerSchool not allowing educators to report incidents in multiple categories.

1.117 The following charts show the significant increase in reported racist and discriminatory behaviours, validating the need for more focus on these types of incidents. Reported incidents of racist and discriminatory behaviours increased by 196 per cent and 285 per cent respectively over the past seven years.



Source: Office of the Auditor General of Nova Scotia; Department of Education and Early Childhood Development



Source: Office of the Auditor General of Nova Scotia; Department of Education and Early Childhood Development

 **Over 18 per cent (26,000) reported violent incidents over the last seven years had no record of any action taken by school administration**

- 1.118 In the 142,000 reported violent incidents in PowerSchool over the last seven years, we found 26,000 or over 18 per cent of reported incidents had no record of any action taken by school administration.
- 1.119 Over half (53 per cent) of educators who responded to our provincewide survey indicated this was one of the reasons they have not reported an incident in the past. Lack of faith in the system to respond to and follow up on reported incidents can lead to a lack of reporting. RCE staff should be making sure principals are responding to and following up on all reported incidents in their schools. The WHO speaks to the importance of reported incidents being followed up quickly, effectively, and satisfactorily.
- 1.120 We were told by management at the Department there are two platforms within PowerSchool. Management indicated that at times, teachers are entering incidents into the incorrect platform of PowerSchool which results in administration not receiving a notification of an incident being reported. This may lead to actions not being documented or taken.
- 1.121 We were also told that, for students on a Individual Program Plan, instead of issuing typical consequences per the Code of Conduct, they may have their individual plan adjusted to address the trigger for the behaviour. This may explain why some incidents have no action taken documented in PowerSchool.

 **School staff experiencing violence from parents/guardians of students**

- 1.122 We heard from a number of staff during our school visits that violence from parents or guardians of students was increasingly becoming a problem.
- 1.123 In our provincewide survey, over 65 per cent of educators said they had witnessed or experienced violence from the parent or guardian of a student.
- 1.124 PowerSchool does not allow for reporting of violent incidents (or other unacceptable behaviours) committed by the parents or guardians of a student. This means any history of incidents involving parents or guardians are not being tracked. Failing to include this category results in a knowledge gap for educators who may be interacting with the parent or guardian.

Recommendation 1.3:

We recommend the Department of Education and Early Childhood Development improve violence in schools data collection, accuracy and reliability of incidents by:

- Establishing processes to verify data is accurate and reliable;
- Clarifying how to categorize an incident;
- Clarifying the level of detail required when reporting an incident;
- Requiring “action taken” to be filled out for all incidents;
- Creating a standardized process for how violent incidents experienced by Teacher Assistants should be reported;
- Reinforcing requirement for educators to report all incidents;
- Adding the ability to document the name of the impacted individual when reporting an incident;
- Adding the ability to capture if the impacted individual of an incident is from a marginalized group;
- Defining which types of incidents require a debrief and by whom;

- Establishing a tracking mechanism to ensure debriefs are occurring and students and educators are provided with appropriate supports after an incident; and
- Clarifying how and when to report incidents involving parents and guardians.

Department of Education and Early Childhood Development Response: EECD has already begun working with partners, Regional Centres for Education (RCEs) and the Conseil scolaire acadien provincial (CSAP) to develop a provincewide strategy on safe and inclusive schools. This work integrates an updated Provincial School Code of Conduct Policy (“the Policy”), a new provincial behaviour strategy and updated Emergency Management Plans.

Through this work, we will identify data standards to inform decisions, guide reporting and inform professional learning.

Data standards will improve accuracy and reliability including at collection. These will include specific instruction for staff regarding level of detail required when reporting and responding to incidents.

The updated Teacher Assistant (TA) Guidelines, anticipated in Fall 2024, include a section titled Safety and Behaviour which outlines how a TA assists with positive behaviour supports and responds when a student has challenges self-regulating their behaviour, including reference to RCE/CSAP reporting processes when they experience harm. Target Date: December 2024 for completion of Phase 1 (including consultation, strategy drafting); May 2025 for completion of Phase 2 (including piloting, professional learning and training, communications); September 2025 for implementation; June 2025 for Teacher Assistant Guidelines.

Safety Gaps in School Preparation for Hold-and-Secure and Lockdown Protocols

All schools in Nova Scotia are required to have an Emergency Management Plan

- 1.125 The Emergency Management for Nova Scotia Schools Provincial Guidelines (the Guidelines) require all public schools in the province to create an Emergency Management Plan. These plans must include procedures on how staff should respond in the event of emergency situations.
- 1.126 We focused our work on two types of emergency incidents – lockdowns and hold-and-secures. The objective of the lockdown is to isolate students and staff within classrooms in the school in response to the threat of violence present within the building. The objective of a hold-and-secure is in response to a threat outside of the building and allows activities within a school to continue while controlling who enters and leaves the building.

HRCE and CSAP are not tracking trends in lockdown and hold-and-secure incidents

- 1.127 HRCE and CSAP are not requiring schools to track how often they are experiencing incidents that result in a lockdown or hold-and-secure. Tracking these incidents would allow HRCE and CSAP to know if there is an increase in these types of incidents and to identify any concerning trends. Both HRCE and CSAP management indicated school administrators verbally notify them each time there is a lockdown or hold-and-secure incident.
- 1.128 The educators we spoke with also highlighted an additional growing safety concern. They spoke of classroom evacuations occurring which are when all students must be evacuated from the classroom to another area of the school, usually due to the behaviour of one of their classmates. Teachers indicated it is very disruptive when this needs to occur and may be traumatizing for the students required to evacuate. HRCE and CSAP are not tracking the frequency of these classroom evacuations.

Recommendation 1.4

We recommend the Department of Education and Early Childhood Development require Regional Centres for Education and Conseil scolaire acadien provincial to track incidents of lockdowns and hold-and-secures with details of the nature of the incident and require the Regional Centres for Education and Conseil scolaire acadien provincial to perform regular trend analysis.

Department of Education and Early Childhood Development Response: It is a priority of EECD to provide the most current guidance on school safety and emergency management. The *School Emergency Management Plan: Provincial Guidelines* provide guidance to RCEs/CSAP on school safety and emergency management. Schools conduct drills and execute components of the plan as needed during emergencies.

EECD has already begun working with partners, Regional Centres for Education (RCEs) and the Conseil scolaire acadien provincial (CSAP) to develop a provincewide strategy on safe and inclusive schools. This work integrates an updated Provincial School Code of Conduct Policy (“the Policy”), a new provincial behaviour strategy and updated Emergency Management Plans.

EECD’s updated School Emergency Management Plan: Provincial Guidelines will include tracking isolation incidents (both lockdowns and hold-and-secures).

Data will be analyzed annually to inform decisions and training. Target Date: December 2024 for completion of Phase 1 (including consultation, strategy drafting); May 2025 for completion of Phase 2 (including piloting, professional learning and training, communications); September 2025 for implementation.

Some HRCE and CSAP schools lack lockdown policy when students are at recess or lunch

1.129 The Guidelines require schools to have a plan in place for a lockdown incident during times when students are not in the classroom, such as recess or lunchtime. We found the Emergency Management Plan for four out of the seven schools we visited did not include any such plan for these types of instances. This puts students and staff at risk if an emergency lockdown situation arose during these times of the school day.

School emergency plans lack clear communication protocols

1.130 The Guidelines require Emergency Management Plans to list information about the type of communication during and after a lockdown or hold-and-secure.

1.131 Our testing found five of the seven Emergency Management Plans we examined did not have clear protocols for who will be contacted, and how and when they will be contacted in the event of an emergency.

1.132 We also found six out of seven schools did not have evidence of communication to parents of what to expect before, during and after a lockdown or hold-and-secure event. Parents and guardians of students need to know what to expect from schools in the event of an emergency at their child’s school.

HRCE completing hold-and-secure and lockdown drills as required, while CSAP needs improvements

- 1.133 The Guidelines require every school in Nova Scotia is required to complete two lockdowns and one hold-and-secure drill per year.
- 1.134 We tested a sample of schools in HRCE, and all schools completed the required drills on time. Documentation included the date the drill was completed as well as details on the results.
- 1.135 In contrast, we found a number of CSAP schools did not complete their required drills. We also found several schools that completed drills after the required deadline.

 **Educators in HRCE and CSAP are knowledgeable about procedures for lockdown and hold-and-secure incidents**

- 1.136 The majority of educators we spoke with in schools were confident about how to proceed in the event of a lockdown or hold-and-secure drill.

Recommendation 1.5

We recommend the Department of Education and Early Childhood Development verify school Emergency Management Plans include all essential components of the Emergency Management for Nova Scotia Schools Provincial Guidelines.

Department of Education and Early Childhood Development Response: EECD has already begun working with partners, Regional Centres for Education (RCEs) and the Conseil scolaire acadien provincial (CSAP) to develop a provincewide strategy on safe and inclusive schools. This work integrates an updated Provincial School Code of Conduct Policy (“the Policy”), a new provincial behaviour strategy and updated Emergency Management Plans.

Protocols and guidelines related to school safety and emergency management will clarify responsibilities for establishing plans, tracking, and reporting drills and incidents. Target Date: December 2024 for completion of Phase 1 (including consultation, strategy drafting); May 2025 for completion of Phase 2 (including piloting, professional learning and training, communications); September 2025 for implementation.

Reasonable Assurance Engagement Description and Conclusions

In Spring 2024, we completed an independent assurance report on Preventing and Addressing Violence in Nova Scotia Public Schools at the Department of Education and Early Childhood Development, Halifax Regional Centre for Education and Conseil scolaire acadien provincial. The purpose of this performance audit was to determine whether the Department of Education and Early Childhood Development is effectively preventing and addressing violence in Nova Scotia public schools.

It is our role to independently express a conclusion about whether the Department of Education and Early Childhood Development, Halifax Regional Centre for Education and Conseil scolaire acadien provincial are adequately preventing and addressing violence in Nova Scotia public schools and comply in all significant respects with the applicable criteria. Management at the Department of Education and Early Childhood Development has acknowledged its responsibility for preventing and addressing school violence.

This audit was performed to a reasonable level of assurance in accordance with the Canadian Standard on Assurance Engagements (CSAE) 3001—Direct Engagements set out by the Chartered Professional Accountants of Canada; and sections 18 and 21 of the *Auditor General Act*.

We apply the Canadian Standard on Quality Control 1 and, accordingly, maintain a comprehensive system of quality control, including documented policies and procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements.

In conducting the audit work, we have complied with the independence and other ethical requirements of the Code of Professional Conduct of Chartered Professional Accountants of Nova Scotia as well as those outlined in Nova Scotia's Code of Conduct for public servants.

The objectives and criteria used in the audit are below:

Objective(s):

To determine whether the Department of Education and Early Childhood Development is providing appropriate oversight and guidance to the Regional Centres for Education and Conseil scolaire acadien provincial for preventing and addressing school violence.

To determine whether the Halifax Regional Centre for Education and Conseil scolaire acadien provincial are appropriately preventing and addressing school violence.

Criteria:

1. The Department of Education and Early Childhood Development should provide overall direction, policy and support to Regional Centres for Education and Conseil scolaire acadien provincial for preventing and addressing school violence.
2. The Halifax Regional Centre for Education and Conseil scolaire acadien provincial should have workplace violence risk assessments and prevention plans and communicate them to educators.
3. The Halifax Regional Centre for Education and Conseil scolaire acadien provincial should investigate and respond to incidents of school violence.
4. The Halifax Regional Centre for Education and Conseil scolaire acadien provincial should require, and track training for educators related to violence in the workplace.
5. The Halifax Regional Centre for Education and Conseil scolaire acadien provincial should monitor whether schools are performing required emergency preparedness drills.

Generally accepted criteria consistent with the objectives of the audit did not exist. Audit criteria were developed specifically for this engagement. Criteria were accepted as appropriate by the Deputy Minister of the Department of Education and Early Childhood Development.

Our audit approach consisted of interviews with management and staff of the Department of Education and Early Childhood Development, Halifax Regional Centre for Education, Conseil scolaire acadien provincial and a sample of individual schools in Halifax Regional Centre for Education and Conseil scolaire acadien provincial. We reviewed relevant legislation, policies, procedures and data. We examined documentation around workplace risk assessments and assessed emergency management plans for individual schools for compliance with provincial guidelines. We performed a survey of educators across the province. Our audit period covered September 1, 2021 to June 30, 2023. We examined documentation outside of that period as necessary.

We believe the evidence we have obtained is sufficient and appropriate to provide the basis for our conclusions. Our report is dated June 5, 2024, in Halifax, Nova Scotia.

Based on the reasonable assurance procedures performed and evidence obtained we have formed the following conclusions:

- The Department of Education and Early Childhood Development is not providing appropriate oversight and guidance to Regional Centres for Education and Conseil scolaire acadien provincial for preventing and addressing violence in schools.
- The Halifax Regional Centre for Education and Conseil scolaire acadien provincial are not appropriately preventing and addressing violence in schools.

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