Chapter 13
Regina School Division No. 4—Promoting Positive Student Behaviour

1.0 MAIN POINTS

Promoting positive student behaviour, and addressing problem behaviour, facilitates student success at school and provides a safe learning environment. All school divisions have a responsibility for promoting positive student behaviour at schools.

This chapter sets out the results of our second audit of processes for promoting positive student behaviour at school. Our first audit focused on South East Cornerstone School Division No. 209, a large rural-urban school division. This audit focused on Regina School Division No. 4 (Regina Public or Division), one of Saskatchewan's largest urban school divisions.

Regina Public had, other than in the following areas, effective processes for promoting positive student behaviour at school. It needs to do the following:

> Keep consistent and accessible documentation of key discussions, decisions, and steps taken to support positive student behaviour. Such documentation would assist in monitoring steps taken to support positive student behaviour, and help avoid repeating intervention strategies found ineffective for students who transfer between schools.

> Communicate training expectations for initiatives to promote positive student behaviour, and require information on staff trained in key initiatives be made readily available at schools. This would help make sure the Division has a sufficient number of trained school administrators and staff available, and such personnel are readily identifiable at each school to support students and respond to high-risk situations.

> Track and report to its Board of Education the success of key initiatives to promote positive student behaviour. Such information would enable the Division to determine if initiatives are making a difference.

2.0 INTRODUCTION

Student behaviour influences the extent and quality of education that students receive. Positive student behaviour creates a safe, inclusive, and accepting school environment for learning and contributes to student success.[1] The success of students can have a significant impact on our society and economy. Poor behaviour can contribute to students leaving school before graduating from Grade 12 or without obtaining marks that could assist them in obtaining further education or finding employment.[2]

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[1] www.edu.gov.on.ca/eng/parents/safeschools.html (16 June 2015).
[2] Auditor General of British Columbia, *Fostering a Safe Learning Environment: How the British Columbia Public School System is Doing*, (2001), p. 19.

Regina School Division No. 4 is one of the largest urban school divisions in Saskatchewan with about 21,000 students and 50 schools – 41 elementary schools and 9 high schools. Six of the elementary schools and two of the high schools offer French Immersion programs. The Division has seen a 4% increase in its enrolment from 2011 to 2014.[3]

3.0   BACKGROUND

3.1   Legislated Responsibilities for Student Behaviour

The Education Act, 1995 (Act) (s85(1)) assigns boards of education (school boards) responsibility for administration and management of schools, with oversight from the Ministry of Education (Ministry). The Act makes school boards responsible for exercising general supervision and control over the schools in the school division. School boards approve administrative procedures pertaining to the internal organization, management, and supervision of schools.

The Act (s150 and 151) establishes the duties and accountability of students, including regular attendance, observing behaviour standards set by the school board, conforming to board-approved school rules, and respecting discipline exercised by the school. Students are accountable to teachers and principals for their conduct when at school or while engaged in school activities (e.g., extracurricular activities).

Under the Act (s152 to 155), all students are subject to the general discipline of a school, and school boards have specific disciplinary responsibilities for both investigating and treating problems between a student and a school. The Act gives principals and school boards the power to suspend and expel students. The Act (s178) sets out processes to address behaviour of students assessed as having intensive needs.[4]

The Act (s156 to 161) expects regular school attendance of all students of compulsory age (i.e., between the ages of 6 and 16 years), and defines permitted exceptions (e.g., illness, travelling). It requires school boards to appoint a local attendance counsellor responsible for monitoring student attendance, and implementing school board attendance procedures (e.g., conducting investigations concerning attendance problems, reporting to principals and parents concerning investigations).

3.2   Education Sector and Board Expectations Related to Student Behaviour

In 2013, the Ministry of Education established a sector-wide strategic plan for Prekindergarten-Grade 12, called the *Education Sector Strategic Plan* (ESSP). The ESSP includes the following strategic intent statements that relate to student behaviour:

❭   I am ready to learn: I am safe, healthy and hopeful

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[3] *Regina School Division No. 4 of Saskatchewan Annual Report 2013-14*, pp. 12-13.
[4] Section 178 of the Act defines a student with intensive needs as a student assessed by the board of education as having a capacity to learn that is compromised by a cognitive, social-emotional, behavioural or physical condition.

❯ I am valued: I have a voice and am supported in my ways of learning

❯ I belong: I contribute, am respected and respectful[5]

The *Regina Public Schools Strategic Plan: 2014-2017* states that Regina Public adheres to the ESSP. It describes the mission statement of Regina Public: "To instill the value of knowledge, the dignity of effort and the worth of the individual." The Strategic Plan also describes Regina Public's shared values: "I belong, I am responsible, I respect, and I want to know."[6] In the Strategic Plan, the Division has identified goals of providing supports and interventions to address students' learning and behavioural needs.[7]

Promoting positive student behaviour and addressing problem behaviour are vitally important in encouraging student success and providing a safe and productive learning environment. Effective implementation of initiatives to promote positive student behaviour can limit circumstances where disciplinary measures are necessary.

4.0 Audit Objective, Scope, Criteria, and Conclusion

The objective of this audit is to assess the effectiveness of the processes used by Regina School Division No. 4 to promote positive student behaviour at school for the 12-month period ending November 30, 2015.

For this audit, positive student behaviour means behaviour that is consistent with the educational goals of attending school and demonstrates respect, responsibility, and readiness to learn. At school includes school-sanctioned activities (e.g., school sports or trips). This audit did not include examining physical safety of students and staff at schools.

To conduct this audit, we followed the standards for assurance engagements published in the *CPA Canada Handbook – Assurance*. To evaluate Regina Public's processes, we used criteria based on our related work, reviews of literature including reports of other auditors, and consultations with management. Management agreed with the criteria (see **Figure 1**).

Figure 1—Audit Criteria

1. **Establish requirements for acceptable student behaviour**
   1.1 Set policies for acceptable student behaviour and promotion of positive student behaviour (i.e., code of conduct, policies for attendance and discipline)
   1.2 Align requirements with legislation
   1.3 Communicate requirements to school administrators, teachers, students, parents, and stakeholders

2. **Use key initiatives to promote positive student behaviour**
   2.1 Select positive student behaviour initiatives that align with division requirements
   2.2 Provide training for promoting positive student behaviour to school administrators, teachers, parents, and stakeholders
   2.3 Implement initiatives

3. **Address disruptive behaviour**
   3.1 Identify disruptive behaviour
   3.2 Take action to address identified problems in accordance with requirements
   3.3 Monitor and review the effectiveness of the actions taken

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[5] www.education.gov.sk.ca/educations-strategic-sector-plan-matrix-2014-2020 (16 June 2015).
[6] www.rbe.sk.ca/sites/default/files/pages/files/rps_strategic_plan_2014-2017.pdf, p. 1 (16 June 2015).
[7] *Regina Public Schools Strategic Plan 2014-2017*, pp. 9 and 16.

> 4. **Monitor effectiveness of initiatives and actions taken**
>   4.1   Assess key success factors of initiatives and actions (e.g., indicators)
>   4.2   Measure results
>   4.3   Adjust initiatives and actions as required
>   4.4   Report on results

We concluded for the 12-month period ended November 30, 2015, Regina School Division No. 4 had, other than in the following areas, effective processes to promote positive student behaviour at school. Regina School Division No. 4 needs to:

❭ **Require consistent, accessible documentation of key discussions, decisions, and steps taken to support positive student behaviour**

❭ **Communicate training expectations for initiatives to promote positive student behaviour**

❭ **Require principals to make available, at schools, information on staff trained in key initiatives to support positive student behaviour**

❭ **Track and report to its Board of Education the success of its key initiatives to promote positive student behaviour.**

In addition, Regina School Division No. 4 needs to review and update its policies on a regular basis as its policy expects.

5.0   KEY FINDINGS AND RECOMMENDATIONS

In this section, we set out the criteria (expectations) and our key findings along with related recommendations. For clarity, when we refer to school administrators, we mean principals and vice-principals. When we refer to school staff, we mean teachers, counsellors, educational psychologists, occupational therapists, and support staff.

5.1   Establish Requirements for Acceptable Student Behaviour

We expected that Regina Public would have processes for setting expectations for student behaviour that are in line with both legislation and its policies or administrative procedures. It would have documented policies and procedures regarding the communication of consistent behavioural expectations. The Division would communicate the expectations for student behaviour to students, staff, and parents in a consistent manner.

Regina Public established requirements for acceptable student behaviour within its administrative procedures (e.g., *Shared Expectations, Attendance of Students, Discipline*). Regina Public posts its administrative procedures addressing student behaviour on the Division website. Its procedures for student behaviour, discipline, and attendance were clear, aligned with the relevant requirements included in *The Education Act, 1995*, and included behaviour expectations and responsibilities for students, parents and teachers (e.g., *Shared Expectations* procedure).

While Regina Public had an administrative procedure requiring that the Division conduct a regular review of its administrative procedures, we found it did not do so. Seven of its nine administrative procedures related to student behaviour were last reviewed four or more years ago (i.e., one was last reviewed four years ago, six were last reviewed eight years ago). Periodically reviewing administrative procedures (for example, every three to four years) helps ensure their continuing relevance and applicability.

> 1. **We recommend that Regina School Division No. 4 review and update policies (administrative procedures) on a regular basis as its policy expects.**

Regina Public used orientation days, weekly newsletters, and monthly meetings to communicate key administrative procedures and changes to principals. Superintendents of the Division also had regular contact with principals of schools they oversee. At November 2015, the Division allocated oversight of its 50 schools between four superintendents.

Regina Public used staff meetings to communicate *Shared Expectations* and other administrative procedures to school staff, school administrators, and teachers. It held meetings regularly (e.g., weekly, bi-weekly, or monthly). We observed that meeting agendas included discussions of student behaviour.

Each school in Regina Public had a website for school administrators and staff to post information about the school, such as contact information, upcoming events, programs and services offered, student agendas, and newsletters. The school websites included a link to the Division's website. Even though schools did not consistently post expectations regarding student behaviour on their websites, the Division did. We also observed posters in schools, and information about behavioural expectations in student agendas provided to students.

5.2 Use Key Initiatives to Promote Positive Student Behaviour

5.2.1 Initiatives Align With Division Requirements

We expected Regina Public would have processes to select positive student behaviour initiatives that align with Division requirements. We expected schools would implement initiatives in accordance with Division guidance.

Regina Public uses an approach for addressing student behaviour and other issues called Intervention First. As shown in **Figure 2**, the approach included three escalating tiers of initiatives and supports progressing from school-wide and classroom-based initiatives to interventions specific to an individual student. The approach also combines collaborative problem solving, with both family and community involvement.

Figure 2—Intervention First – Pyramid of Supports

Tier 3
Intensive
Individual
Interventions
Ongoing Tier 1 and
Tier 2 Interventions,
Inter-Agency Involvement,
Instruction and School
Services Support Team,
Documented Intervention Plan

Tier 2
Targeted/Group Interventions
Ongoing Tier 1 Interventions, Supplementary
Strategic Instruction and Behaviour Supports,
Needs-Based Assessment, School-
Based/Interdisciplinary Team Problem Solving
Meetings, Documented Intervention Plan

Tier 1
Universal/School-Wide and Classroom-Based Interventions
Core Cirriculum/Outcomes and Indicators, Universal Screening/Value-
Added Assessment, Differentiated and Adapted Instruction, Frequent
Progress Monitoring, Inclusive Practices, Culturally Responsive
Practices, Self-Regulation, Fostering Independence, Assistive
Technology, Teacher Team Problem Solving Meetings

Source: Adapted from Intervention First model for providing student learning and behavioural supports. Taken from
www.rbe.sk.ca/intervention_first (accessed 23 June 2015).

Within the Intervention First approach, Regina Public used numerous initiatives to promote positive student behaviour. Regina Public encouraged school administrators, staff, and teachers to bring forward ideas and approaches for use at their school. School administrators noted that they discussed school–identified initiatives with Division superintendents prior to implementation. In some instances, the Division piloted initiatives in one school before implementing them elsewhere in the Division (e.g., Friends for Life, Playground Conflict Managers Program).

Regina Public assigned responsibility for rolling out initiatives to its four superintendents. It gave school administrators and staff some autonomy to implement Division-endorsed initiatives that meet the specific needs of its students. School administrators indicated they sought the advice of individuals in the school with relevant expertise (e.g., occupational therapists, counsellors, learning resource teachers), and, depending on the initiative, assigned them more responsibility for implementation.

The initiatives in use varied between schools. The Division endorsed both system-wide initiatives (i.e., used in all schools) and smaller-scale initiatives (e.g., Quiet High/Elementary, Structured Learning Classroom). **Figure 3** provides examples of key behaviour initiatives in place.

Figure 3—Examples of Regina Public's Behaviour Initiatives

Circle of Courage is a model of positive student development based on the principles of belonging, mastery, independence, and generosity.

Zones of Regulation teaches students to become more aware of, and independent in, controlling their emotions and impulses, managing their sensory needs, and improving their ability to problem solve conflicts.

Friends for Life Program is aimed at helping students deal with stress and anxiety.

Playground Conflict Managers Program trains students to help younger students resolve conflicts.

High School Advisory Program provides students in high schools with a dedicated 15-minute period each day with their advisory teacher. The student has the same advisory teacher each year they are in high school. Part of the role of the advisory teacher is to form a strong mentorship bond with the student, as well as monitoring the student's academic progress and attendance.

Mandt Training (non-violence crisis intervention) for school staff is a comprehensive, integrated approach to preventing, de-escalating, and if necessary, intervening when the behaviour of an individual poses a threat of harm to themselves and/or others.

Violence Threat Risk Assessment (VTRA) helps school staff identify behaviour and responses where there is a threat or risk of injury to the student or those around them. This assessment also collects data on details of incidents and records information on future risk and courses of action.

Intervention First is a model for providing student learning and behavioral supports and interventions. It includes an integrated and multi-tiered approach involving collaborative problem-solving. It also includes students, families, teachers, administrators, professional support staff (e.g., counsellors, educational psychologists, occupational therapists, learning resource teachers, etc.), and other community and interagency personnel. Students are classified into Tier 1 (Universal/School-Wide and Classroom-Based Interventions), Tier 2 (Targeted/Group Interventions) and Tier 3 (Intensive Individual Interventions) based on their level of need.

Structured Learning Classroom (SLC) is a program designed for students with severe social, emotional, and behavioural challenges that interfere with a student's academic achievement. SLC focuses on helping students effectively manage their emotions and behaviours so that they can return to the regular classroom.

Quiet High/Elementary is a program for students with disorders such as anxiety and depression that significantly affect their ability to cope in a regular classroom setting.

Source: Adapted from information provided by Regina Public.

In addition as shown in **Figure 4**, it carried out certain initiatives with partner organizations (e.g., YMCA, Regina Police Service).

Figure 4—Partnerships

School Resource Officer Program is a partnership with the Regina Police Service (RPS). Under this program, the Division provides the RPS School Resource Officers (SROs) with dedicated office space in each of the Regina high schools. Duties include participation in classroom discussions and assemblies, prevention of crime through close contact with students, interpreting law and assisting students with legal problems, etc.

RespectED program is a partnership with the Red Cross and Regina Police Service aimed at targeting and reducing bullying (physical, verbal, relational, cyberbullying) within schools.

Alternative to Suspension Program is a partnership with the YMCA designed to ensure time spent away from school is an overall success. Students are supervised, are required to stay up-to-date on their schoolwork, and have time to reflect to change their attitudes toward school and turn their suspension into a positive experience.

TRiP (Regina Inter-sectoral Partnership) is an inter-agency partnership (e.g., police, Ministry of Social Services, Health Region) designed to provide supports to students and their families with elevated risks. The goal of the program is to identify risk factors early, and through utilization of targeted intervention, eliminate these risks before they become bigger problems.

Youth in Custody Program is a partnership with the Ministry of Justice (Corrections and Policing) to support the education of youth released from custody to transition back into the school system.

Source: Adapted from information provided by Regina Public.

5.2.2 Clarification of Training Requirements Needed

We expected Regina Public would identify training to school staff on both promoting positive student behaviour, and responding to incidents as they occur in schools. We expected Regina Public would centrally maintain staff training records, and individual schools would formally identify their staff with behavioural expertise.

Regina Public maintained certain professional development records centrally in a system called PD Place. This system was designed to allow administrators and teachers to request and record professional development.

Regina Public centrally coordinated training on certain division-wide behaviour initiatives such as RespectED, Mandt Training, and Violence Threat Risk Assessment (VTRA). It made some training mandatory (e.g., VTRA) requiring all principals, vice principals, and counsellors to attend. For optional areas of training, the Division asked principals to identify individuals to attend training when available.

The principals in the schools we visited did not have a consistent or correct understanding as to what Regina Public training was mandatory. Some principals mentioned that Mandt Training was mandatory, while others thought RespectED was mandatory. Both were not. Those principals found communications on mandatory training unclear.

Also, Regina Public did not set a minimum number of school administrators and staff to train within each school on key behavioural initiatives, or give principals guidance on determining the necessary number of trained staff for their school so that schools have sufficient expertise in these areas. For example, guidance could set out considerations such as the number of students requiring supports, the nature and extent of behavioural challenges and what training administrators and staff would require to support the unique needs of each school.

Not clearly documenting which training is mandatory, and for whom, increases the risk that school administrators and staff may not receive training at appropriate times. Not having a sufficient number of trained school administrators and staff available, or not readily identifiable (e.g., standard location for a listing of staff trained in specific areas) at each school increases the risk that skills required to support students and respond to high-risk situations[8] may not be available.

> 2. **We recommend that Regina School Division No. 4 communicate to school administrators and staff, in writing, training expectations for initiatives to promote and support positive student behaviour.**

> 3. **We recommend that Regina School Division No. 4 require principals to make readily available, at schools, information on administrators and staff trained in key initiatives to promote and support positive student behaviour.**

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[8] High-risk refers to situations where student and staff safety is at risk (e.g., fights, weapons).

5.3 Address Disruptive Behaviour

5.3.1 Consistent Documentation on Student Behaviour Needed

We expected that Regina Public would have processes and mechanisms to consistently identify and address disruptive student behaviour. This would include escalation processes to address such behaviour. We also expected the Division would document instances and key actions taken to address problem student behaviour and adjust processes as necessary.

We found that Regina Public identified disruptive student behaviour through a variety of sources (e.g., by teachers, bus drivers, staff meetings, counsellors, students, and parents). Once behaviour issues were identified, schools used several interventions or responses. These included classroom interventions, observations, counselling, parent meetings, formal behaviour plans customized to the student's needs, and collaboration with internal committees. We found internal committees and discussions regarding student behaviour included:

❯ Periodic (e.g., every four to six weeks) meetings of student achievement teams (comprised of school administrators, teachers, professional support staff) at elementary schools to monitor behaviour, and review individual behaviour plans and the resulting interventions

❯ Weekly grade meetings for Grade 9 to 12 to monitor behaviour and discuss other issues; all teachers of a particular grade attended these meetings

❯ Assignment of advisory teachers to students to guide and assist them from Grade 9 through Grade 12

All the schools we visited documented, on a daily basis, attendance in Regina Public's student information system called PowerSchool. We found staff in each of these schools made initial home contacts when a student was absent.

For students with chronic attendance problems, documentation of contact and communications with students and parents was inconsistent. For these students, we found schools documented some but not all contacts in PowerSchool. We found some documentation of chronic attendance problems in student report cards (contained in the student file [cumulative record]).[9] Student files we examined that related to attendance problems did not include documentation of meetings or actions taken to resolve attendance problems.

Regina Public indicated that schools look for ways to keep students in school rather than suspend them, as it finds a suspension does little to support the student's success. We found school administrators used different methods to keep students in school. For example, some called or visited students or parents in their homes. Also, the Division had partnered with the YMCA to provide the Alternative to Suspension Program. Through this program, students received supervision and assistance on keeping up to

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[9] Cumulative record is a file that compiles information about a student from year to year that is maintained by the schools the student attends from Kindergarten to Grade 12.

date with their schoolwork in an alternative environment. For the student files we examined, we did not note any instances of suspension or expulsion.

Where necessary, Regina Public expected administrators, teachers, and professional support staff to collaborate in creating a formal behaviour plan for students (e.g., Impact Assessment and Inclusion and Intervention Plan).[10] Behaviour plans are Tier 2 interventions under the Intervention First approach; these plans document strategies and approaches (internal and external) to support the student. We found teachers, administrators, and staff gathered information through various methods (e.g., grade group meetings, student-achievement team meetings, notes in PowerSchool, progress reports on behaviour plans).

The Division expected staff to review behaviour plans on a regular basis; school administrators indicated they expected school staff to review most behaviour plans every four to six weeks, and update them annually. In 14 of the 30 student files we examined (that should have had behaviour plans in them), we were unable to determine whether school staff reviewed behaviour plans consistently. Staff responsible for reviewing behaviour plans did not leave evidence of their review. Documented regular review of behaviour plans helps verify approaches and interventions continue to be relevant and appropriate.

In 12 of the 30 student files we examined, we found behaviour plans were not in the files or readily accessible. For example, behaviour plans were not kept in a consistent location resulting in school administrators taking time to locate them.

Not keeping key documentation to support positive behaviour of students (e.g., behaviour plans, actions, discussions, decisions, evidence of review of plans) makes it difficult for Regina Public to follow a consistent course of action. It also makes it difficult for Regina Public to monitor steps taken to support positive student behaviour. Furthermore, when a student transfers to another school or school division, if key documentation is not readily available or easily transferred, the student may not be appropriately supported, or intervention strategies used to address problem behaviour that were found ineffective for that student may be repeated.

> **4. We recommend that Regina School Division No. 4 require consistent and accessible documentation of key discussions, decisions, and steps taken to support positive student behaviour.**

Regina Public indicated it was in the process of implementing an electronic system to track and organize key information (e.g., behaviour plans, meeting notes, progress reports) on student behaviour for use in schools starting March 2016. It expects this system to interface with PowerSchool.

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[10] Impact Assessments and Inclusion and Intervention Plans (IA & IIP) are developed for students who require additional supports to aid them with their school experience. Development of an IA & IIP involves the student, their parents, teachers, administrators, counsellors, and other professional support. An IA & IIP would identify in which Tier the student falls under the Intervention First Model, and records the plans and goals for the student going forward, as well as the supports required for the student to be successful (e.g., use of psychologist or programs offered by the school and Division).

5.4 Monitor Effectiveness of Student Behaviour Initiatives and Actions Taken

### 5.4.1 Reporting on Overall Success of Student Behaviour Initiatives Needed

We expected Regina Public's processes would monitor the performance of key initiatives used to promote positive student behaviour. We also expected the Division and schools to adjust initiatives as required and report on results.

Other than student attendance, the Division has not identified types of data to collect to evaluate student behaviour such as incidents involving disrespect to staff, fighting, and disobedience.

Student attendance can impact graduation rates. Regina Public's Strategic Plan includes performance targets such as graduation rates (i.e., 80% graduation rate by 2017). It collects and analyzes trends in graduation rates.

The Division tracked and monitored student attendance. To improve high school attendance, the Division implemented a High School Attendance Strategy at the start of the 2015-16 school year. The strategy set out protocols for responding to attendance issues, incentives for rewarding good attendance, and supports (e.g., an attendance support program that includes individualized instruction). While the Division expected an increase in attendance in response to this strategy, it had not set out specific targets related to attendance (e.g., increase attendance by a certain percentage). Over the past five years, the Division has seen an approximate 2% increase in attendance, as shown in **Figure 5** below.

Figure 5—Annual High School Attendance—Grades 9-12
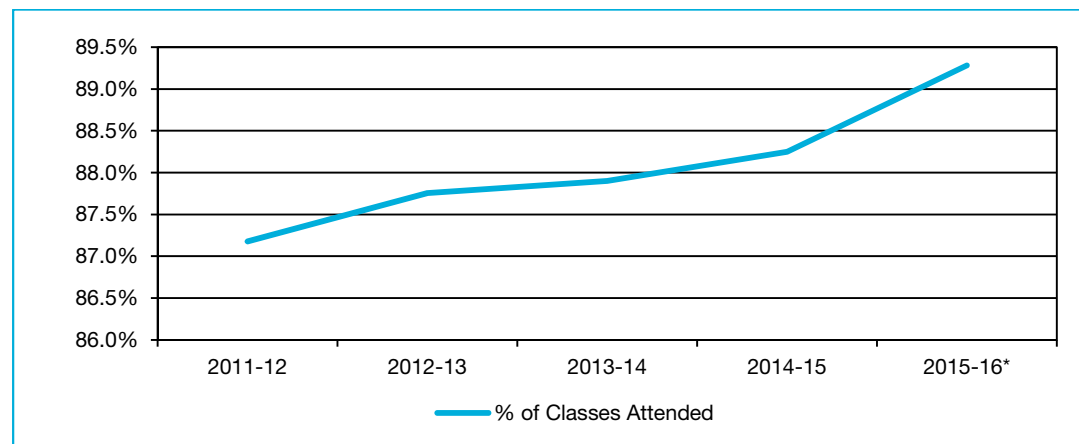
Source: Adapted from information provided by Regina Public.
*Data is for the period September 2015 to January 2016.

Without collecting additional data regarding student behaviour, Regina Public cannot identify trends to determine whether its student behaviour initiatives are successful. Such information would help it to identify areas for improvement, and make informed decisions about these initiatives. In addition, such information will enable the Division to determine if the initiatives are making a difference.

> 5. **We recommend that Regina School Division No. 4 establish a process to track and report to its Board of Education the overall success of its initiatives to promote positive student behaviour.**

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