



All students have the right to attend school in a safe and orderly environment that is conducive to learning.

Participating in and contributing to a safe, respectful and positive learning environment is both the right and responsibility of children and youth, their parents/caregivers, school personnel and all community members. For this reason, there will be a standard procedure for investigating and responding to student threats to harm.

A threat to harm is defined as an expression of intent to do harm or to act out violently against someone or something. Threats may be verbal, written, drawn, posted on the Internet, or made by gesture only. Threats may be direct ("I am going to beat you up") or indirect ("Watch me beat him up after school"). A threat can be vague ("I'm going to hurt him") or implied ("You better watch out").

A school cannot ignore any threat of violence. Plausible or not, every threat must be taken seriously, investigated, and responded to. A clear, vigorous response is essential for three reasons:

First and most important, to make sure that students, teachers, and staff are safe (that is, that a threat will not be carried out);

Second, to assure that they will feel safe and;

Third, to assure that the person making the threat will be supervised and given the treatment that is appropriate and necessary to avoid future danger to others or self.

The PRSD Student Code of Conduct serves as fair notice that incidents of threat to self-harm or to harm others will be actively investigated. PRSD expects that all incidents of threats will be taken seriously and assessed accordingly.

Principal or designate shall respond to student threats, review high risk behaviours, consult with others, develop action plans and recommendations in order to provide intervention to students and their families in a proactive manner.

Principals or designates will ensure that appropriate support is provided to those against whom threats have been made and shall notify staff and parents/guardians as required.

Because of the serious nature of such incidents, the investigation will continue even if the parent/guardian cannot immediately be contacted. Continued efforts will be made to contact the parent/guardian.

Law Enforcement notification: If a student is determined by the principal or designee to have made a threat to kill, severely injure, or commit a sexual offense, the threat will be reported to law enforcement.

STEP 1:

Principal or designate receives a report of a concerning behaviour or situation. The administrator will assess threatening behaviours and make informed judgement on the level of risk or danger posed to students and staff. All incidents of threat-making behaviour will be documented. The school administrator will be responsible for completing or designating the completion of the PRSD Threat Assessment form as needed. All threats shall be taken seriously and evaluated.



STEP 2:

Upon completion of the PRSD Threat Assessment form, the principal shall make an initial decision if the behaviour involves:

- Worrisome behaviour
- Threat-making behaviour
- Immediate risk situation

Worrisome Behaviour

Worrisome behaviour refers to behaviour that causes concern for school staff because of its violent theme or content and may indicate that a student is moving toward a greater risk of violent behaviour, i.e., drawing pictures, writing stories, vague threats with no specific target.

The majority behaviour, from kindergarten to grade 12, falls into this category. In keeping with the duty to respond to threat-related behaviour, all worrisome behaviours will be communicated to the principal or designate who will consult with the school-based threat assessment team.

In many cases, following up on “worrisome behaviours” results in good early intervention measures. There are also cases where “a little data leads to a lot” and what seems like a minor case can quickly evolve to the formal activation of the Comprehensive Threat Assessment (CTA) team.

The principal or designate shall:

- Collect details of the incident;
- Contact the director of student services for consultation;
- Activate the school-based threat assessment team (principal, vice-principal, counsellor, teacher designate);
- Notify the parent/guardian of the threat maker and intended victim(s);
- Develop an intervention plan.

School-based threat assessment team shall:

- Attend to the safety and comfort needs of all involved students;
- Support the development of an Intervention Plan with the CTA team;
- Refer the student for services;
- Monitor the student’s response to services;
- Report, collect, share and store information.

**Threat-Making Behaviour**

Threat-making behaviour refers to behaviour that contravenes The Criminal Code of Canada, [Section 264.1(1)] which states:

Every one commits an offence who, in any manner, knowingly utters, conveys or causes any person to receive a threat (a) to cause death or bodily harm to any person; (b) to burn, destroy or damage real or personal property; or (c) to kill, poison or injure an animal or bird that is the property of any person.

Although students under twelve (12) years of age cannot be charged under the Law, their actions shall be subject to assessment using these procedures.

In these situations, the school-based threat assessment team will be activated to determine to what degree a threat maker actually poses a risk to the target or targets that he or she has threatened. In some cases students will be suspended from school during an assessment period to protect others from potential harm, to protect themselves, or both.

The principal or designate shall:

- Collect details of the incident (PRSD Threat Assessment form);
- Plan for immediate risk reduction;
- Notify the police as required;
- Contact the director of student services for consultation. Together, the principal and director of student services will determine whether a divisional Comprehensive Threat Assessment (CTA) will be carried out. This CTA will be managed by the director of student services.
- With the school-based threat assessment team, attend to the immediate safety needs of the school community;
- Notify the parent/guardian of the threat maker and intended victim(s). The threat maker and intended victim(s) must be released to the custody of a responsible parent/guardian once all assessments and investigations have concluded.

The Comprehensive Threat Assessment (CTA) involves interviews and consultations to determine to what extent the threat maker has the resources, intent and motivation to carry out the threat. A CTA will be activated by the Director of Student Services following consultation with the principal or designate. The Comprehensive Threat Assessment team will be comprised of the Director of Student Services, threat assessment trained divisional clinical staff in partnership and the school-based threat assessment team. The findings of the CTA shall be integrated into the final Intervention Plan. Both clinical and school based teams shall be responsible for writing the plan.

The Comprehensive Threat Assessment team shall:

- Attend immediately to the school to support the principal and school-based team with further assessment of the situation;



- Assess the underlying problem that generated the threat;
- Support the school-based team to develop an Intervention Plan;
- Liaise with outside agency supports as required.

The school-based team shall:

- Attend to the safety and comfort needs of all involved students;
- Support the development of an Intervention Plan with the CTA team;
- Refer the student for recommended support services;
- Monitor the student's response to services;
- Support the student by designing a Behaviour Intervention Plan;
- Report, collect, share and store information.

Immediate Risk Situation

Immediate risk situation refers to a threat or situation of concern that appears to pose imminent and serious danger to the safety of target or targets. In these cases a threat is posed and the matter is one of immediate police intervention and protective school response, not threat assessment. In some cases students will be suspended from school during an assessment period to protect others from potential harm, to protect themselves, or both.

The principal or designate shall:

- Call 911;
- Activate school safety protocols (lockdown, evacuation);
- Inform the superintendent;
- Activate the members of the school-based threat assessment team and complete the PRSD Threat Assessment form;
- Contact the Director of Student Services for consultation. Together, the principal and director of student services will determine whether a divisional Comprehensive Threat Assessment (CTA) will be carried out. This CTA will be managed by the Director of Student Services.
- With the school-based threat assessment team, attend to the immediate safety needs of the school community;
- Notify the parent/guardian of the threat maker and intended victim(s). The threat maker and intended victim(s) must be released to the custody of a responsible parent once all assessments and investigations have concluded.



The school-based threat assessment team shall:

- Attend to the safety and comfort needs of all involved students;
- Support the development of an Intervention Plan with the CTA team;
- Refer the student for services;
- Monitor the student's response to services;
- Support the student by designing a Behaviour Intervention Plan;
- Report, collect, share and store information.

If Violence Has Occurred

When violence occurs, the following general guidelines can help administrators to determine if the case should be dealt with as a disciplinary matter or as a violence/threat/risk assessment case:

The principal shall determine if the matter is one of immediate police response. In cases of violence the matter may be one of immediate police intervention, not threat assessment.

Consult with Director of Student Services if:

- Lower baseline violence appears unprovoked;
- Clear victim and perpetrator dyad with power imbalance (age, size, social power, etc.);
- Intent to harm present;
- If the frequency, intensity, recency (FIR) of the violence denotes a significant increase in behavioural baseline of the perpetrator(s).

Inform the Director of Student Services if:

- Serious violence has occurred;
- There is intent to seriously injure the target(s);
- When illegal weapons (knives, guns, replicas, machetes, etc.) are brandished or used in the commission of the offense;
- Direct, clear, and plausible threats to kill or seriously injure are communicated

These situations result in immediate deployment of The Comprehensive Threat Assessment (CTA) team to determine risk assessment.



Behaviours that Typically Do Not Warrant Formal Threat/Risk Assessment

There are several situations where the procedures will either not be activated or will be a later consideration rather than a primary intervention.

A. Active Situations

These situations include armed intruders inside the building or on the periphery who pose a risk to some target or targets, or active shooter (attacker) scenarios. When immediate risk is identified, the principal or designate will contact the police and take steps to ensure the safety of all school members, as outlined in established protocols (e.g., perimeter lockdown, full scale lockdown, etc.) In these cases a threat is posed and the matter is one of immediate police intervention; not threat assessment. Threat assessment teams do not have an immediate role here but may be utilized following the immediate crisis to assist with a follow-up inquiry and recommendations. Parents/guardians shall be contacted as determined by police in consultation with the principal. Formal Threat/Risk Assessment will not be undertaken until the situation has stabilized. In many cases, the legal system will have already referred the assailant for a comprehensive forensic assessment.

B. Students Under Twelve Years of Age

When students under the age of twelve engage in violent or threat-related behaviours, developmental and exceptionality issues need to be taken into consideration. Although formal activation of the threat assessment team may not occur, students who are even younger may benefit from police involvement as a way for the law enforcement team member to provide a ‘teaching moment’ for the child. Generally speaking, most threat-related behaviour exhibited by elementary aged students would fall into the category of “worrisome behaviours”. Just because a student is ten or eleven years of age, however, does not mean they cannot pose a risk. If there is a significant increase in baseline behaviour, weapons possession or clear, direct and plausible threats, the formal assessment will be activated.

C. Non-School Hour Cases

If information is received regarding a threat that is clear, direct, and plausible before or after school hours, police will be called and parent/guardian will be notified immediately so that they can take steps to notify and protect the target(s).

As a second step, the CTA team will be activated if the situation is deemed to have potential to pose ongoing risk to some member(s) of the school community.



THREAT/RISK ASSESSMENT PROCESS – REPORTING, COLLECTING, SHARING AND STORING INFORMATION

DUTY TO RESPOND

Schools shall respond to all threat risk related behaviours; all risk behaviours shall be taken seriously and assessed accordingly.

CREATE AN EXPECTATION FOR RESPONSIBLE REPORTING

In order to allow for a timely and appropriate assessment and intervention of high-risk student behaviours, any school division employee, student, parent or other individual having knowledge of such behaviour, shall immediately report this information to the school's principal or designate.

Actively teach students that seeking adult support for worrisome behaviour is not 'ratting or snitching' but, rather, a social responsibility for the wellbeing of all. School staffs need to actively counter the 'code of silence'.

To the extent possible, the identity of the reporter will be kept confidential. Deliberately false or misleading reports by students or staff will be treated as incidents of inappropriate conduct and may be subject to disciplinary action.

FAIR NOTICE

School administrators must include the Divisional Fair Notice brochure (attached) about the threat assessment protocol and procedures, for all students and parents/guardians in the first school newsletter of each school year (or to new students when they transfer into the school) so that "fair notice" is given that threat behaviour will not be tolerated.

It is the responsibility of the principal to ensure that students, staff, and parents/guardians are aware of the procedures and that a consistent message is given regarding the use of the procedures.

Principals will review the Procedures for Violent Threat Risk Assessments with staff at the beginning of each school year.

DEFINITION OF THREAT ASSESSMENT/STAGE 1 ASSESSMENT

Threat assessment is the process of determining if a threat maker (someone who utters, writes, emails, etc., a threat to harm a target or targets) actually poses a risk to the target(s) being threatened. Although many students, and others, engage in threat making behaviour, research indicates that few actually pose a risk to harm the target being threatened. Stage 1 is focused on the threat at hand and whether or not the student poses an immediate risk. Some cases are isolated incidents between two individuals related to a particular issue and no actions are required beyond the Stage 1 assessment and intervention.

DEFINITION OF THREAT ASSESSMENT/STAGE 2 ASSESSMENT

A stage 2 Comprehensive Threat Assessment is typically a more lengthy process that involves measures that go beyond the scope of the school-based assessment. After the initial level of risk is assessed and the immediate risk reducing intervention has occurred, a further risk assessment may be required. Therefore, CTA is the process of determining if a student who has made a threat (or has already engaged in violence) actually poses a threat or risk



of further violence to some known or unknown target(s) at some unknown period in time. The student may be evidencing increasing violent ideation or behaviours that suggest the frequency or intensity of his/her violence or violence potential may be escalating. Unlike the immediate intervention, the CTA is meant to be a more comprehensive evaluation of all risk enhancing factors affecting the student's functioning and to use that data to guide longer term intervention and treatment goals. At this stage, the CTA team can draw on the expertise and/or jurisdictional authority of child protection workers, psychologists or psychiatrists, specialized treatment programs, etc. The focus is on more comprehensive evaluation and longer term treatment planning.

UNAUTHORED THREATS: ASSESSMENT AND INTERVENTION

Unauthored threats are typically threats to commit a violent act against an individual(s), specific group, or site (i.e. the school). They may be found written on bathroom walls or stalls, spray painted on the side of schools, posted on the Internet, letters left in a conspicuous place (teacher's desk), etc.

There are steps that should be followed to assess the unauthored threat, attempt to identify the threat maker and to avoid or minimize the crisis/trauma response.

SUMMARY OF KEY ACTIONS TO BE TAKEN

Upon discovery of a written threat, the principal/designate shall take action to ensure the following:

1. Document the threat by recording words and taking a clear, legible photo of the threat.
2. Lock or close off the room where the threat was discovered until initial assessment has occurred. If initial assessment indicates a need for police involvement, call police, maintain the security of the location and await police directive. Removal of evidence is dependent on police directive and/or response time.
3. Get name of person(s) who discovered and reported the threat.
4. Consult with the superintendent.
5. If a student reported the threat, contact their parent/guardian to indicate follow-up is occurring. The timing of the contact can vary according to circumstance, but should be done before the student goes home.
6. In a moderate to high risk situation where many staff and students are aware of the written threat, inform staff of what has occurred and advise what to tell students. In these situations, students, staff and parents should be notified by letter providing general information, and reassuring them that police have been notified. In written communication, do not repeat what was said in the threat. Notify all other groups in the school, such as day cares or nursery schools.

THE ROLE OF POLICE: LEVELS OF THREAT

In immediate risk situations such as armed intruders inside the building or on the periphery who pose a risk to some target(s), or active shooter scenarios, the principal or designate will contact the police, 911, and take steps to ensure the safety of all school members. In these cases an immediate risk is posed and the matter is one of immediate police intervention. In all other instances, the role of police will vary depending on the level of threat:

- A. Low Level



Poses little threat to public safety and in most cases would not necessitate police investigation for a possible criminal offence. Police interventions, if any, may involve minimum interview with the student and his or her parent/guardian.

B. Moderate Level

A moderate level threat will sometimes warrant investigation as a possible criminal offence. The response should in most cases include contacting police, as well as other sources, to obtain additional information (and possibly reclassify the threat into the high or low category).

C. High Level

A high level threat is highly likely to result in criminal prosecution. The school should immediately inform the police and implement any crisis response plans deemed necessary. Police should be kept informed of subsequent actions taken in response to the threat.

PRE-SUSPENSION INTERVENTION CAUTION

It is imperative that school administration develop a preliminary intervention plan to manage threat makers prior to an out of school suspension. An out of school suspension is high risk as this period is often viewed by high-risk students as the 'last straw'. It is in this stage that many threat makers decide to finalize a plan to terrorize their school or attack a specific target: this can include homicidal or suicidal acts. The suspension does not cause the violence to occur but creates the necessary context for the high-risk student, who is already struggling with suicidal and/or homicidal ideation, to take the final step from planning to action. School administration is responsible to determine whether suspension is warranted but consultation with the threat assessment team should always be a precursor to a final decision on the matter. If suspension is necessary, a critical question beyond when to suspend is where to suspend. The isolation and disconnection felt by high-risk students during an out of school suspension may be exacerbated if steps are not taken to keep the student connected to healthy supports. In some cases this may involve hospitalization, placement through child welfare services or enlisting parent/guardian support in helping to keep the child and others safe.

Suspending a student for making a threat must not be a substitute for careful threat assessment and a considered, consistent policy of intervention. Disciplinary action alone, unaccompanied by any effort to evaluate the threat or the student's intent, may actually exacerbate the danger – for example, if a student feels unfairly or arbitrarily treated and becomes even angrier and more intent on carrying out a violent act.

DATA COLLECTION

Data collection involves review of the existing data available at the school level and discussion among the members of the school-based threat assessment team in order to guide decisions in developing an Intervention Plan and to maximize student safety.

Data collection may include:

- Review of current and previous school discipline records;



- Discussions with school staff, students, the target(s) of the threat, the student of concern, parent/guardian;
- Searches of the student(s) locker(s), desk, backpack and/or car(s)
- Review of the student's activities, i.e., school assignments, notebooks, diaries, Internet usage, etc.;
- A call to previous school personnel.

RESPONSIBLE SHARING OF INFORMATION

The Supreme Court of Canada has established legal precedent by ruling (in *R. vs. M (M.R.)*) that in certain situations, the need to protect the greater student population supersedes the individual rights of the student. The ruling explicitly acknowledges that school officials must be able to act quickly and effectively to ensure the safety of the students and to prevent serious violations of the school rules. Two principles relevant to VTRA protocols were established by the Supreme Court:

The individual charter rights of the student are lessened to protect the collective need for safety and security of the general student population.

Schools officials have greater flexibility to respond to ensure the safety of the general student population in an educational setting than law enforcement officials have in a public setting.

Therefore, if an individual is in possession of information that may indicate that there is an imminent danger to the health and safety of any person or persons and the source of the information is reliable, the information can be shared without consent. If information has been shared without consent, the individual shall be advised with whom the information was shared as required by law.

The Youth Criminal Justice Act also provides direction regarding sharing and disposal of information:

All sharing of youth justice information (i.e. relating to young persons aged 12-17 inclusive who are being dealt with under the criminal law) is subject to the nondisclosure provisions under ss. 119(2) of the Youth Criminal Justice Act.

Under ss.125.(6), the Youth Criminal Justice Act enables information in a YCJA record to be shared with any professional or other person engaged in the supervision or care of a young person – including a representative of any school board or school or any other educational or training institution – for a range of reasons, including safety of staff, students or other persons. Such sharing of information does not require the young person's consent.

The recipient of youth justice information is responsible for ensuring compliance with legislated restrictions on its use and disposal under YCJA ss. 126 (7). This provision requires that the information must be kept separate from any other record of the young person, that no other person must have access to the information except as authorized under the YCJA or for the purposes of ss. 125(6), and that it must be destroyed when it is no longer needed for the purpose for which it was disclosed.



Manitoba has legislation that permits information sharing under circumstances where there is imminent danger. It is important to review the relevant legislation and guidelines in the Manitoba Pupil File Guidelines, Child Protection Services and Youth Justice to ensure adherence while providing for school safety.

The Manitoba Pupil File Guidelines (pages 22-24) outlines the process related to third party requests for information. A third party is a person, group of persons or an organization other than the person that the information is about and other than the school division maintaining the record. In particular:

- Personal Information (FIPPA) – staff may disclose personal information about a pupil if disclosure is necessary to protect the mental or physical health or the safety of any individual or groups of individuals (clause 44(1)(l)).
- Personal Health Information (PHIA) – staff may disclose personal health information about a pupil if the school division reasonably believes that the disclosure is necessary to prevent or lessen a serious and immediate threat to the mental or physical health or safety of the pupil or another individual or to the public health or public safety (clause 22(2)b)).

Information pertaining to assessment of students' threatening behaviour will be shared on a need-to-know basis. Typically, this will involve sharing of factual information and not personal details about the student or others involved in the threatening behaviour. Decisions regarding sharing of information will be made by the school-based threat assessment team led by the principal or designate and may include consultation with the superintendent and/or the director of student services.

COMMUNICATION WITH SCHOOL STAFF

School personnel will be informed of specific incidents of student threatening behaviour on a need-to-know basis as determined by the school-based threat assessment team led by the principal or designate. In the event of a high profile threatening situation, the principal or designate shall notify and debrief staff regarding actions taken.

COMMUNICATION WITH STUDENTS

Students will be informed of specific incidents of threatening behaviour on a need-to-know basis as determined by the school-based threat assessment team led by the principal or designate. In the event of a high profile threatening situation, the principal or designate may elect to notify and debrief students regarding actions taken.

COMMUNICATION WITH RECEIVING SCHOOL

When a threat assessment has been conducted, the findings of the assessment shall be shared with the receiving school.

COMMUNICATION WITH PARENT/GUARDIAN

A. Threat Maker

Parents/guardians of the threat maker should be notified at the earliest opportunity. Specifically, notification should occur after the team has collected enough initial data to confirm that a threat or violent incident has occurred and has determined the current level of violence potential. In the case of threat/risk assessment, the



parent/guardian are also part of the assessment process as they are necessary sources of insight and data regarding the increases or decreases in baseline and other contextual factors that may be either risk-reducing or risk-enhancing. As such, notification of parent/guardian is meant to activate a collaborative process between home and school to more fully assess the student and collaboratively plan for appropriate intervention where necessary. However, if for some reason there is a reluctance to participate in the process, by the threat maker or parent/guardian, the threat assessment process will continue in order to ensure a safe and caring learning environment for all.

B. Target

In the event a student has been determined by the threat assessment team to pose a moderate or high level of risk to a specific target(s), the parents/guardian of the target(s) should be notified at the earliest opportunity. Often the target and his/her parent/guardian are fearful or traumatized by the situation. Notification therefore should be done with skill, tact and planning. A plan should be made for possible emotional supports the family may need. As such, if the threat is clear, direct and plausible or the team feels violence may be imminent, notification will occur after the target is secured/protected (if the case is unfolding during school hours and the target is present at school) from potential harm. If the initial threat is not clear direct and plausible and data collected by the team indicates a low level of risk to the target(s), the parent/guardian of the target(s) may be informed.

C. Common Reasons for Delay of Notification

If the student discloses child abuse during the threat/risk assessment process, CFS personnel will collaborate with the team on appropriate timing of parent/guardian notification of the threat/risk assessment. CFS may opt to notify parent/guardian themselves as part of their child protection investigation.

In some cases, prior history with the parent/guardian of the threat maker or target may denote that the parent/guardian pose a risk of violence to staff or others. In those cases, notification of such adults would be timed to minimize potential risk and the team may opt to request a police member notify the parent/guardian.

STORING INFORMATION

Upon activation of the Prairie Rose School Division Protocol for Responding to Threat-Making Behaviours the following documents shall be completed and stored in the Pupil Support File:

- PRSD Threat Assessment Form
- Intervention Plan

Notation shall be made on the INFORMATION AVAILABLE ON FILE form located in the student's Cumulative file.

In the event a Comprehensive Threat Assessment is completed, this report shall be stored in:

- The divisional student services file

ACCESS TO THREAT ASSESSMENT DOCUMENTATION AND REPORTS



A parent/guardian of a student who has made a threat shall be provided with a copy of the school's Intervention Plan. If a Comprehensive Threat Assessment Report has been completed, the parent/guardian shall receive a copy of the treatment recommendations.

School personnel will have access to threat assessment documentation on a need-to-know basis to assist in the educational programming of the student and/or to ensure a climate of safety in the classroom and school environments.

Intervention Plans and/or treatment recommendations developed through a Comprehensive Threat Assessment process shall be shared with individuals or agencies outside the school system only with consent from the parent/guardian.

INVOLVING AND COMMUNICATING WITH PARENTS/GUARDIANS

The school-based threat assessment team shall contact the parent/guardian of a student who has made a threat to inform him/her of the incident and to explain the threat assessment procedures. Due to the potential threat to student and staff safety, the investigation will continue even when the parent/guardian cannot be contacted immediately. Continued efforts will be made to contact the parent/guardian and involve him/her in the threat assessment process. Once a determination of the level of risk or danger has been made, the parent/guardian shall be requested to participate in the development of an Intervention Plan and discussion of treatment recommendations.

In the event a student making a threat has identified a specific target(s) or victim(s) and the school-based threat assessment team has determined that the student poses a moderate or high level of risk, the parent/guardian of the targeted victim(s) shall be notified. If it is determined that the student poses a low level of risk to the targeted victim(s), the parent/guardian of the targeted victim(s) may be informed.