



# Bragg Creek Education Services Association

## Policies and Protocols

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### SECTION 1 ADMINISTRATIVE POLICIES AND PROTOCOLS

#### **CHILD DISCIPLINE POLICY**

##### **Purpose:**

All children have the right to learn in a safe and positive learning environment. An integral part of each of our programs is creating a safe and secure environment for the children that teaches them community within their own classroom. Each child must learn to be a positive and responsible member of not only their classroom, but also within their family, their immediate community and the global community.

The purpose of this policy is to outline the responsibilities and techniques to be used when a child continues to behave inappropriately.

##### **Policy:**

Bragg Creek Education Services Association ("BCESA") is committed to a discipline policy that creates a safe and caring school environment that will enable all children to achieve their highest potential. All children will be treated with dignity and respect.

Self-discipline is important for every child. Although the BCESA operates its programs to encourage this growth, it does impose certain restrictions where the safety of the children is involved or where the behavior of a child interferes with others. Fundamentally, this discipline policy states that the teaching staff has the authority to act as a judicious parent.

Behavior techniques will be used in the following order:

1. Setting limits and redirection, with positive reinforcement of correct behaviour.
2. Intervention with correction of inappropriate behaviour.
3. We have a supportive environment where adults are readily available to help with conflict situations; children are encouraged to "stop and ask for help" where there is a conflict.
4. Time out (where the child is put in a quiet area for a few minutes) in order to regroup.
5. Phone call to parents of inappropriate behaviour. If behaviour is severe (another child or adult in the environment is harmed), then the child must be taken home immediately after the behaviour occurs.
6. If the behaviour consistently occurs, then a conference with the teacher, President or Vice President of the Executive, and the parent will occur.
7. At the conference, the problems and various behaviour strategies in which to correct the behaviours, will be discussed. If the behaviour is severe or persistent, the parents may need to consent to the evaluation and remediation by school specialists (psychologist, occupational therapist and speech language pathologist). Additional supervision (a teacher assistant) may be necessary to ensure the safety of the other children at this time. A reasonable amount of time will be given to solve the problem. However, if the parents do not consent to the involvement of specialists and an assistant, and if there are three more instances of inappropriate behaviour, then the child will be dismissed.
8. At the conference, a letter in writing of the inappropriate behaviour will be given to the parent. The letter will also outline the above policy with regards to remediation of the problem. This needs to be signed and returned.

Discipline is most effective when the teacher and the parent work in a supportive relationship through on-going communication. Through mutual understanding and co-operation an acceptable solution will be sought that is in the best interest of all the children.

At every step along the way, all matters will be treated in the strictest confidence. The Teacher, the Executive and the Administrator will not discuss the issue openly, particularly in venues where other parents, children or members of the community may overhear.

## **EMERGENCY EVACUATION PROTOCOLS**

Teachers and Staff may need to evacuate children from the school in a situation in which there is immediate danger to being inside the building.

Responsibilities of staff upon notice of evacuation:

1. Quickly scan the space around you looking for any potential hazards. Report any findings to the Teacher.
2. Account for all children. Conduct a head count and ensure accurate attendance records. Portable records must be kept with staff.
3. Gather all medications and any other essential needs of children (e.g. asthma inhaler) - if accessible.
4. Once outside the building, take children to the designated evacuation area and conduct a head count matched to the attendance records to ensure all children are outside.
5. Wait for the Teacher to provide further direction.
6. Provide activities to reduce stress to children (i.e. holding circle, songs, games).

Responsibilities of the Teacher:

1. Coordinate all actions with emergency authorities, giving them as much information as possible.
2. Notify all staff of the evacuation plan. Depending on the nature of the emergency, notify staff if they should take the children to the on-site evacuation location or to the off-site evacuation location.
3. Take the Portable Emergency Contact Information Book with all of the children's Emergency Contact Information
4. Designate one staff member to assist each child with special needs in evacuating if staff numbers permit.
5. Designate one staff member to wait outside and direct emergency vehicles such as fire trucks and ambulances to your location (if applicable).
6. If you are evacuating to the off-site location, contact the facility with an estimated time of arrival of children and staff.
7. Transport all necessary medications, first aid supplies, emergency numbers, and cell phone.
8. Do a final check - ensure all children have been removed from the school.
9. Take direction from Police/Emergency Authorities once they arrive. If requested, stay at the location with Police or other Emergency Authority.
10. Notify families of the situation and evacuation location for immediate pick up of children. (Teacher may designate a staff responsible for calling families etc. if requested to stay with emergency authorities).

Once you have safely evacuated the building to the on-site location or off-site location:

1. Call parents/families or designate staff to call parents/families of children and notify them of the emergency and where children can be picked up. Make sure you are clear on what information is being given to families and that staff are relaying the same messages.
2. Determine where to set up different groups of children and define areas if possible.
3. Document children being picked up and by whom.

Assisted Evacuation:

One-on-one, or additional, help may be required by a child with special needs. You may need to use alternate evacuation routes for wheelchair accessibility (i.e. cannot use elevators)

Evacuation Relocation:

The Bragg Creek Community Centre will be the off-site evacuation location. Teacher will make Staff aware of an alternate location if needed.

## **VOLUNTEERS, VISITORS AND PRESENTERS MANDATORY RECORD CHECKS**

### **Purpose/Background**

To add another layer of due diligence in the effort to ensure the safety and well-being of children and staff at BCESA, all volunteers must complete Criminal Record and Vulnerable Sector Checks. Visitors and presenters do not require a Criminal Record or Vulnerable Sector Check if they are appropriately supervised by staff at all times. An unsupervised Visitor or presenter (e.g. therapist or specialists) must complete Criminal Record and Vulnerable Sector Checks.

## Definitions

Volunteer:	A volunteer supports a classroom, school, or system-wide program under the ultimate responsibility and supervision of the Teacher and staff at the school level. A volunteer is an optional support and agrees to undertake a designated task compliant with current legislative requirements.
Presenter:	A guest to the school whose function it is to provide information or inservice to children on a school related topic.
Visitor:	An individual granted permission by the Teacher or staff or designate to be on school property.
Criminal Record Check:	A check for criminal activity in the three databases of the criminal justice system - the local police services record, the court system for any pending court cases, and the national system which accesses criminal activities across Canada.
Vulnerable Sector Check:	An electronic search of criminal databases conducted by local police to provide information on crimes against those most vulnerable (e.g., children, seniors, and those with disabilities).

## Procedures

1. Teacher and staff will instruct all volunteers to complete Criminal Record and Vulnerable Sector Checks prior to volunteers coming in contact with school children.
2. Volunteers are required to complete the Criminal Record and Vulnerable Sector Checks with the local police agency and submit the results to be reviewed by the Teacher at the school level.
  - a. The initial Criminal Record and Vulnerable Sector Checks are valid if completed within one year prior to the date of volunteering.
  - b. Volunteers engaged within the school on an on-going basis must submit new Criminal Record and Vulnerable Sector Checks every five years.
3. The results of the Criminal Record and Vulnerable Sector Checks must be acceptable to BCESA.
4. If the volunteer Criminal Record and Vulnerable Sector Checks show criminal convictions, and/or unresolved charges, the Teacher will review and discuss the information with the BCESA Administration to determine a possible action.
5. All documents pertaining to Criminal Record and Vulnerable Sector Checks for volunteers will be managed and retained at the school level.
6. Volunteers with unacceptable Criminal Record and Vulnerable Sector Checks, as determined by the Teacher the school level and the BCESA Administration , shall not be permitted to engage in volunteer activities with the school.

## OFF-SITE ACTIVITY/FIELD TRIP POLICY AND PROTOCOLS

In the event that the school will go on an off-site activity or field trip, the following procedures will be discussed and followed by all Staff and Volunteers participating in the activity or field trip:

1. Staff will research the site prior to taking the children to assess:
  - a. age/developmental appropriateness
  - b. washroom/water availability
  - c. telephone availability (cellular)
  - d. security personnel on site
  - e. check for any potential safety hazards
  - f. shaded rest area
  - g. wheelchair accessibility
2. Staff will choose a method of transportation:
  - a. Southland Transportation Busses / Willco Busses
  - b. walking (only within the neighbourhood)
  - c. Staff will enforce car safety rules that comply with Transport Canada Guidelines

**Preparing to go and Things to bring:**

3. When deciding on the number of parent volunteers, the lead Teacher will consider the following:
  - a. the ages and the needs of the children involved
  - b. the type of activity
  - c. the environment in which the activity is taking place
  - d. any other relevant criteria
4. Children attending the activity/trip will wear the school's orange t-shirts or an identification tag with the name, address, and phone number of the school.
5. Each child must have written parental permission before he/she can participate in the activity. The parent permission letter will include the destination, method of transportation, date, time of departure and return to the School, supervision arrangements, requirement of appropriate clothing/ necessities such as sunscreen, hat, snow pants etc..
6. Teachers will inform the children where they are going and what will happen, whom they will see and who they will need to listen to. Enough information will be given to help the children feel secure and comfortable but not too much to spoil the experience.
7. Teachers will plan with the children and set up experiences in the School that will enhance the field trip experience ie: begin a documentation panel, practice safety rules etc.
8. Safety rules will be discussed with the Staff, volunteers and children eg: designated meeting area, children must stay with the adult and group in which they were assigned. Only if ALL Staff and adults are aware, will a child switch groups. Attendance will be taken BEFORE the group leaves the School.
9. All adults attending the trip will be given the Teacher's phone number so if the group gets separated they will still be able to communicate.
10. In case the groups get separated, each Staff responsible for a group will carry a backpack containing the following:
  - a. emergency medication ( if any required)
  - b. first aid kit
  - c. portable emergency information for both Staff and children
  - d. snacks, water, tissues (wipes), sun screen
11. Upon arrival, Staff will :
  - a. take attendance again
  - b. visit the designated meeting place and review applicable safety rule

**Staff will review the 3 guidelines to follow if someone gets separated from the group:**

1. stay put
2. talk to a "safe adult"( store or park employees, security officers, police. Generally people who are wearing uniforms or badges).
3. don't go anywhere with someone you don't know

**ALL** children will be accompanied by an adult when using the washroom. staff will take attendance regularly.

### **IN THE CASE OF A LOST CHILD**

Staff will be prepared to do the following:

- Conduct a brief search of the immediate area - then get help from the nearest employee or security officer. Check designated meeting place.
- Give a description of the child and the clothing he/she was wearing - show the photo of the child.
- Contact the police and parents.
- Ensure the other children are safe and make a decision to remain on site or return to the School.

12. After the activity, teachers will follow-up by:

- a. listening and observing children while on the field trip - what are their questions and interests?
- b. planning related activities and learning experiences.

**\*\* Staff will have a backup plan in case the field trip is cancelled.**

### **EMERGENCY AND SAFETY CONTACTS AND PROTOCOLS**

#### **Emergency Contacts:**

A staff member will ensure that the following telephone numbers are readily accessible:

1. emergency medical service;
2. ambulance service;
3. fire department;
4. police service;
5. poison control centre;
6. nearest hospital or emergency medical facility;
7. child abuse hotline.

#### **Fire Safety Policy:**

1. Ensure the Teacher, Teacher's Assistant and Educational Assistants have read and are familiar with the Emergency Plan.
3. Ensure that the Emergency Plan is posted at the front door and in the basement.
4. Ensure all fire extinguishers are annually inspected and charged.
6. Maintain extinguishers in designated spots on the wall at the front exit, and in the basement.
7. All staff is to assist in keeping exit routes clear.
8. Keep furnace room clear of flammables.
9. Control hazardous products by storing solvents and flammables safely and in limited quantities.
10. Fire drills will be run as per the Emergency Plan.
11. Date/time regarding each fire drill will be recorded for the Society's annual records by the Teacher.

### **EMERGENCY PLANS**

#### **Fire:**

Teacher Responsibilities:

1. Tell everyone to line up facing the main entrance door upon initiation of alarm or evacuation notice.
2. Take a head count from the front of the line. Inform the Teacher's Assistant, if all children are present, and in line or the number missing in line.
3. Check the front door to make sure exiting through the front door is safe and free from any hazard.
4. If main door unsafe to exit through:
  - a. Have the children stand in line and reassure them that you will be going out the back EXIT.
  - b. The Teacher's Assistant or other staff will check the safety of the rear door and inform the teacher of any hazard. The next alternative is the closest window.

5. If any children were missing in the initial count, check with teacher's assistant as to their whereabouts.
6. Take Emergency Plan binder.
7. When all children are present in line, or the Teacher's Assistant states where the missing child is. Begin walking to the Muster Point, while rechecking to ensure all children are present and are following silently and walking single file.
8. Remain with the children at all times. Go to Muster Point, Teacher's Assistant should be at the end of the line. Take formal attendance. Ensure it agrees with the attendance for the day.

If smoke is present have the children crawl on their hands and knees. The Teacher or Teacher's Assistant will choose the safest means of exit. Then the Teacher's Assistant will complete the responsibilities of checking the bathrooms, rooms (shutting doors to indicate they have been checked) and turning off the lights, if it is safe to do so and if all the children are in line. If all clear is given, return to the classroom.

**Teacher's Assistant & Educational Assistant's/Staff Responsibilities:**

1. Have children form a single-file line to the front door.
2. If children are missing from the count, find them, then turn out lights and close all doors on main floor.
3. If all children present and exiting with Teacher and it is safe to do so, attempt to extinguish the fire with closest Fire Extinguisher. Close windows in main room, and check bathrooms. Turn out lights and close doors on exiting each room.
4. All staff are to assist Teacher to calm children and have them walk silently.
5. If the Teacher reports that the front door is not safe to exit through, check the safety of the rear door.
6. Take over the responsibilities of the Teacher, if the regular Teacher is absent or unable to lead children.
7. When the all clear is given, everyone will return to the classroom.

**Bomb Threat:**

The Teacher will:

1. Treat every threat seriously.
2. Record Bomb Threat information.
3. Note time of call. Hang up for several seconds.
4. Dial \*57 to initiate trace for legal action. Follow instructions given. You will be asked to dial "1". Trace information will be given to police.
5. Call police. Dial 911.
6. Use the pre-arranged signal (CODE RED) to notify staff and adults in the classroom.
7. Evacuate school using the evacuation Fire Drill or Fire procedure.
8. The first responsibility is the care of the Kindergarten children and staff.
9. A staff member may assist in the search, if asked to do so, under the direction of the police when appropriate and provide information as requested.

**Lock Down Procedure:**

1. Teacher will use the pre-determined statement to alert staff: "CODE RED"
2. Teacher Assistant will ensure the front door is closed and will lock deadbolt if it is not already locked.
3. Children will be walked calmly into the basement with staff to supervise while teacher calls 911.

**Dangerous Trespasser, Armed Intruder or Noxious, Poisonous, Harmful Substance Spill:**

The teacher will give a clear message as follows:

1. Immediate Evacuation - "Follow the fire drill exit procedure now."
2. Immediate Lock Down - "CODE RED:"
  - a. close and lock or barricade classroom door if possible
  - b. close windows and blinds, turn off the lights
  - c. keep as quiet as possible, keep away from doors and windows
  - d. take children and staff into the basement
  - e. Call 911. The Fire Alarm Bell should NOT be rung.

**Evacuation Relocation:**

The Bragg Creek Community Centre will be the alternate evacuation location.

**ACCIDENT OR ILLNESS**

In the case of an accident or serious illness involving a child, a staff member will forthwith ensure that

1. the child's parent is notified, and
2. the child receives medical attention if necessary.

**INCIDENT REPORTING**

The following will be reported to licensing immediately regarding a serious illness, injury or any other incident that may occur seriously affecting the health and safety of a child:

1. An emergency evacuation
2. Unexpected program closure
3. An intruder on the program premise
4. A serious illness or injury to a child that requires the program to request emergency health care (911) and or requires the child to remain in hospital overnight
5. An error in the administration of medication by a program staff or volunteer resulting in the child becoming ill
6. The death of a child
7. An unexpected absence of a child from the program ie lost child
8. A child removed from the program by a non custodial parent/guardian
9. An allegation of abuse by a staff member/ volunteer including physical abuse, sexual abuse, emotional abuse or neglect
10. The commission of an offence by a child while in care under an Act of Canada or Alberta; and
11. A child left on the premises outside of the programs operating hours.

In this section, "incident" means:

- a. a serious illness of or injury to a child that occurs while the child is attending a program, and
- b. any other incident that occurs while a child is attending a program that may seriously affect the health or safety of the child.

A staff member must report each incident to the director forthwith in the manner required by the director.

**COMMUNICABLE DISEASE**

Where a staff member knows or has reason to believe that a child may be suffering from a disease listed in Schedule 1 to the Communicable Diseases Regulation (AR 238/85), a staff member must ensure that the child's parent removes the child from the program premises forthwith.

**SUPERVISED CARE FOR SICK CHILDREN**

A staff member will ensure that a sick child is:

1. kept as far away as is practicable from the other children, and
2. directly supervised by a primary staff member.

**MEDICATION**

A staff member may administer or allow the administration of medication to a child only where

1. the written consent of the child's parent has been obtained,
2. the medication is in the original labelled container, and
3. the medication is administered according to the labelled directions.

Where medication is administered to a child, a staff member must ensure that the following information is recorded:

1. the name of the medication;
2. the time of administration;
3. the amount administered;
4. the initials of the person who administered the medication.

A staff member must ensure that

1. subject to clause (b), all medication is stored in a locked container that is inaccessible to children, and
2. medication that may be needed in an emergency is stored in a place that is inaccessible to children.

### **HEALTH CARE**

A staff member may provide or allow for the provision of health care to a child only if

1. the written consent of the child's parent has been obtained, or
2. the health care provided is in the nature of first aid.

### **SMOKING**

A staff member must ensure that no person smokes on the program premises.

No staff member shall smoke at any time or place where child care is being provided.

### **NUTRITION**

A staff member must ensure that snacks are provided to children at appropriate times in accordance with the needs of each child.

## SECTION 2 POTENTIAL HEALTH RISK

If a staff member believes that a child is exhibiting signs or symptoms of illness our staff will call the parents and make arrangements for the immediate removal of the child from the premises, if the parent is not available then the alternate emergency pick up person will be contacted. We will also ensure that the child does not return to the program until the program is satisfied that the child no longer poses a health risk to any of the other children or staff. The child may return to the program after being 24 hours symptom free or having a note from a Physician stating that they no longer poses a threat. We will inform parents of our illness policy at the time of registration and also post a copy of the policy on the parent board.

The following would be considered a Potential Health risk and may include others deemed necessary by the program:

1. Vomiting;
2. High fever, staff with current first aid will take a child's temperature using a digital thermometer under the child's arm;
3. A new unexplained rash or cough;
4. Any illness that requires the child to have greater care and attention that can be provided without compromising the care of the other children in the program; and
5. Having any other illness that the staff believes may indicate a potential health risk to others in the program.

The program will keep track of and record children who are ill during program time by using the illness tracking form, this form will include the child's name, date and time noticed ill, staff member who noticed child was ill, time parent was contacted, time child was removed from the program and the date the child returned to the program.



SECTION 3  
CHILD SUPERVISION POLICY AND PROTOCOLS

The following are program supervision policy and practices:

1. Primary staff are responsible for observing the children in the classroom. They position themselves so that they can interact with the children as well as listen closely to the children even those that are not in the caregiver's direct line of site.
2. On the playground, staff members position themselves so that all staff can view equipment and children.
3. Ratio is met for adults to children.
4. Attendance is done at the beginning and end of the school day.
5. Children's health is monitored to identify early signs of illness.
6. Staff position equipment and arrange the classroom environment to allow caregivers to supervise the children's play and toilet areas.
7. When new staff are hired, they are given a tour of indoor / outdoor space and the Community Centre.
8. Staff is made aware of where the emergency medications are kept and first aid kits and the fire evacuation plan
9. Regular safety checks of the premises and the playground equipment are conducted on a regular basis.
10. Arrival and departure times are accurately recorded on the attendance sheets and these sheets are taken off site as needed.
11. For field trips, attendance is done on the bus when leaving school grounds, before leaving the field trip site, and upon return to the school grounds. Constant head counting is done on field trips and on the playground.
12. A chime is in place on the school's door that tells us when the door is opened or closed.
13. Orange t-shirts with teacher information on the inside - name and phone number are used for all field trips.
14. Staff know which individuals are authorized to pick-up a child from the program in place of a parent.
15. Younger children are supervised more closely and assisted more often. The older children are encouraged to develop their independence.
16. We do not transport between the program and/or school.

Program Supervision Policies are present in the school's Parent Handbook. There is also a posting in our school entrance.

SECTION 4  
TEACHER GROWTH, SUPERVISION & EVALUATION POLICY

The Teacher Growth, Supervision and Evaluation Policy aims to ensure that each teacher's actions, judgments and decisions are in the best educational interests of the child and support optimum learning. School authorities, Early Childhood Services (ECS) operators, superintendents, principals and teachers are responsible for facilitating quality improvement through each teacher's career-long professional growth. POLICY School authorities, ECS operators, superintendents, principals and teachers must work together to develop and implement policy to ensure that all teachers practice consistently in keeping with the Teaching Quality Standard.

**POLICY**

Director of Education and the Executive Board Members must work together to develop and implement policy to ensure that all Certificated teachers practice consistently in keeping with the Teaching Quality Standard.

Bragg Creek Education Services Association (BCESA), as a small ECS Operator, has the following Policies in place:

1. All Certificated Teachers employed by BCESA will prepare an Annual Teacher Professional Growth Plan and will meet as a group to review, discuss and offer professional feedback prior to November 30<sup>th</sup>.
2. All Certificated Teachers employed by BCESA will submit their Annual Teacher Professional Growth Plan to the Society at the Annual General Meeting in November where plans will be presented to the Members and entered into Board Minutes which are a public record available to all Members of the Society.
3. All Certificated Teachers employed by BCESA will add their reflections and spring updates to their Annual Teacher Professional Growth Plan and will meet as a group to review, discuss and offer feedback as a group prior to April 30<sup>th</sup>.

4. All Certificated Teachers employed by BCESA will submit their Annual Teacher Professional Growth Plan to the Society at the Board Meeting prior to May 31<sup>st</sup> where final plans will be presented to the Members and entered into Board Minutes which are a public record available to all Members of the Society.
5. AISCA (Association of Independent Schools and Colleges in Alberta) provides support for Certificated Teachers employed by ECS Operators related to Alberta's Teaching Quality Standard, the expectations of teachers under the Teacher Growth, Supervision and Evaluation Policy, and teacher evaluation for purposes of Permanent Professional Certification.

## **REGULATION, GUIDELINES AND PROTOCOLS**

The Certification of Teachers Regulation, the Practice Review of Teachers Regulation, the Private Schools Regulation, and Teaching Quality Standard (Ministerial Order 016/97) must be referred to in conjunction with this Policy.

1. Each school authority and ECS operator shall implement a policy consistent with this Policy that:
  - a. applies to all Certificated teachers unless otherwise stipulated in this Policy,
  - b. provides a review mechanism,
  - c. is consistent with the teaching quality standard,
  - d. is readily available to the public, and
  - e. details when and how often information summarizing implementation of the policy will be reported to the public.
2. The policy referred to in Procedure 1 shall be developed and implemented in consultation with the teachers of the school authority or ECS operator.

### **Teacher Growth:**

3. A teacher employed by an ECS operator:
  - a. under a probationary contract or continuing contract, or
  - b. under other provisions of the Education Act if required by the policy of the ECS operator, is responsible for completing during each school year an annual teacher professional growth plan that:
    - i. reflects goals and objectives based on an assessment of learning needs by the individual teacher,
    - ii. shows a demonstrable relationship to the teaching quality standard, and
    - iii. takes into consideration the program statement of an ECS operator;
  - c. must submit for review or approval at a time specified in the policy that annual teacher professional growth plan to:
    - i. the Director of Education, or
    - ii. a group of teachers delegated by the Director of Education if such delegation is provided for in the policy.
4. At a time specified in the policy, a teacher must provide a completed annual teacher professional growth plan to the Director of Education for review and the person or persons conducting the review, in consultation with the teacher, must make a finding whether the teacher has completed an annual teacher professional growth plan that complies with Procedure 3.
5. Unless a teacher agrees, the content of an annual teacher professional growth plan must not be part of the evaluation process of a teacher under Procedures 7(c) and 8.
6. Despite Procedure 5, the Director of Education may identify behaviors or practices that may require an evaluation under Procedure 7(c) provided that the information identified is based on a source other than the information in the annual teacher professional growth plan of the teacher.

### **Supervision:**

7. A fundamental component of the policy must be ongoing supervision of teachers by the principal, including:
  - a. providing support and guidance to teachers;
  - b. observing and receiving information from any source about the quality of teaching a teacher provides to children; and
  - c. identifying the behaviors or practices of a teacher that for any reason may require an evaluation.

**Evaluation:**

8. Evaluation:
  - a. The evaluation of a teacher by the Director of Education may be conducted:
    - i. upon the written request of the teacher;
    - ii. for purposes of gathering information related to a specific employment decision;
    - iii. for purposes of assessing the growth of the teacher in specific areas of practice,
    - iv. when, on the basis of information received through supervision, the Director of Education has reason to believe that the teaching of the teacher may not meet the teaching quality standard.
  - b. A recommendation by an authorized individual that a teacher be issued a permanent professional teaching certificate or be offered employment under a continuing contract must be supported by the findings of two or more evaluations of the teacher.
9. On initiating an evaluation, the Director of Education must communicate explicitly to the teacher:
  - a. the reasons for and purposes of the evaluation;
  - b. the process, criteria and standards to be used;
  - c. the timelines to be applied; and
  - d. the possible outcomes of the evaluation.
10. Upon completion of an evaluation, the Director of Education must provide the teacher with a copy of the completed evaluation report.

**Other:**

11. This Policy does not restrict:
  - a. the Director of Education from taking disciplinary or other action, as appropriate, where the Director of Education has reasonable grounds for believing that the actions or practices of a teacher endangers the safety of children, constitutes a neglect of duty, a breach of trust or a refusal to obey a lawful order of the school authority or ECS operator
12. Alberta Education shall not inquire into or report upon any disputes arising from the dissatisfaction of an individual teacher with the evaluation report of an ECS operator if its policy is consistent with this Policy

SECTION 5  
CHILD EVALUATION POLICY

BCESA recognizes the need for children to have continuous evaluation so ECS Programming will be designed to best meet each child's needs. The purpose of the policy is to use assessments to guide instruction and improve learning. Assessments provide Certificated Teachers with information to help them understand what a child knows and does not know. This information is then used to guide instruction and provide support for the child. BCESA is committed to ensuring that information about the child's achievement and growth is used to guide instruction and to meet the child's individual educational needs.

Information on achievement and growth shall be related to learner outcomes as stated in The Kindergarten Program of study, considering what is; developmentally appropriate, the child's age, and, if applicable, delays, diagnosis and the child's Individual Program Plan (IPP).

**Policy:**

BCESA primarily designates the responsibility of the child's evaluation to the Certificated Teachers. Communication between parents and Certificated Teachers plays a vital part in the child's evaluation and growth.

**Guidelines:**

1. The Certificated Teacher is primarily responsible for the child's evaluation.
2. The child's progress is monitored continuously in their educational setting.
3. Evaluation should be an ongoing process, in a variety of contexts and can include the use of evaluation tools.
4. The measures should be appropriate to the child's development and age.

5. Results of assessments will be constructive focusing on what a child can do, clearly identifying both strengths and areas of difficulty. It should encourage improvement in areas of difficulty, linking new learning to what the child already knows and can do.
6. All learning activities, including assessment, will be linked to the learner outcomes in The Kindergarten Program of study and Individual Program Plans (IPP), if applicable.
7. Programming is modified to suit individual needs.
8. Parent involvement is encouraged with opportunities provided for parents to be in communication with school staff and to attend out of school workshops, hands on learning sessions and other home-school connections throughout the school year.

**Procedures:**

1. At the beginning of the school year, parents provide children's interests, strengths and needs to the Certificated Teacher (including early literacy, early numeracy, physical, emotional, social, intellectual and creative).
2. The Certificated Teacher will keep annual records of the child's strengths, behavior, challenges and progress throughout the school year. This will include anecdotal records, checklists, educator/parent/team input and age appropriate play-based assessment tools all measuring each individual child's development, delays, and other pre/Kindergarten Program of study learner outcomes with a focus on pre-literacy and pre-numeracy skills.
3. Community-Based Sites (ages 2.8-5years): in addition, an assessment tool to assess the skills of children ages 3 – 6 years will provide Certificated Teachers with the information they need to put targeted classroom instruction, and appropriate intervention in place as children prepare for Kindergarten. (ie. EYE Tool, Reading Readiness Screening Tool, LeNS, etc.). Parents will be provided with the annual summary of each ECS child's achievement, included in the child's Digital Student Record on PASI.
4. Kindergarten (ages 4-5 years): Scheduled Parent Teacher Conferences are each held twice a year, meetings are available year-round as requested by parent or Certificated Teacher. Parents will be provided with the annual summary of each ECS child's achievement, included in the child's Digital Student Record on PASI.
5. Parents are encouraged to take an active role in their child's educational programming in order to collaborate in providing continuous evaluation and growth.

SECTION 6  
GRIEVANCE/WHISTLE BLOWER POLICY

**Background:**

Every Member of BCESA must have access to a procedure by which complaints and problems can be dealt with in an open, businesslike manner.

**Policy:**

All Members of BCESA have the right to register a complaint or grievance against BCESA, its Members, the staff, therapists and Certificated Teacher of BCESA and all sites and programming under the Administration.

**Guidelines:**

1. The first step in solving problems is for the complainant to make every attempt to resolve the difficulty through discussion with the appropriate person involved in the area of the grievance.
2. If step one (1) is unsuccessful, the complainant shall contact the President, who will attempt to facilitate a solution through further discussion with the parties involved.
3. If step two (2) is unsuccessful, complaints are to be submitted in writing to the President.

**Procedures:**

1. In response to all grievances submitted in writing, the President must call a Special Meeting of the Board of Directors' within fourteen (14) days of receipt.
2. Confidentiality will be respected, if requested.
3. The decision of the Board of Directors must be relayed, by the President, in written form to the complainant within seven (7) days of the meeting.

4. If the complainant disagrees with the decision of the Board of Directors, a petition must be submitted to the President, containing at least five (5) names, of Members who are in good standing with the Society. The President will call a Special Meeting within fourteen (14) days to discuss this concern. This meeting shall be chaired by the President or by a Member of the Board of Directors agreed upon by the Grieving Party and the Board of Directors.
5. All sides in the grievance shall present at this meeting, with a pre-arranged time limit for each side's presentation.
6. The decision of the Special Meeting of the Board shall be binding. A majority vote will decide.

SECTION 7  
PASI USAGE POLICY

**SECURITY CONTROLS FOR PASI USAGE**

**Background:**

Revised security controls for the PASI Usage Agreement between BCESA and Alberta Education under Section 25 of the PASI Usage Agreement will take effect, March 2022.

Every member of BCESA with access to PASI will follow and implement Government of Alberta Information Security Management Directives as recommended by the Government of Alberta. BCESA shall implement the following specified security controls before connecting to PASI via its SIS or PASIprep.

**PASI Usage Agreement For BCESA:**

1. Information security policies, procedures and responsibilities shall be documented, authorized, and maintained.
2. Management shall make personnel aware of mandatory information security management policy instruments.
  - a. Security controls implemented shall be supplemented by appropriate training, exercises, and user awareness materials.
  - b. Security roles and responsibilities shall be defined for all information and IT systems.
  - c. Users of information and IT systems shall take responsibility for and accept the duty to actively protect School Authority information and technology assets, and reporting IT security events and incidents.
  - d. Information controller is accountable for monitoring and reporting security compliance and security incidents to the security officer or as required.
3. External parties shall adhere to security policies and standards established for School Authority information and IT systems. Those requirements shall be established through contract.
  - a. School Authority security requirements shall be communicated with external parties prior to commencement of service delivery agreement.
  - b. Confidentiality agreements for protecting information shall be established and reviewed regularly.
  - c. Security requirements shall be identified and addressed prior to granting external parties access to School Authority information or IT systems and established through contract.
  - d. Information exchange policies, procedures and controls shall be documented and implemented to protect the exchange of information between organizational entities through all types of communication services.
  - e. Information exchange agreements between the School Authority and other external organizations shall be documented.
4. Information transmitted by electronic messaging shall be appropriately protected.
5. Access to IT systems and services shall be consistent with business needs and based on security requirements.
  - a. Users and systems shall be provided access only to the IT systems they have been authorized to use.
  - b. Access to School Authority IT systems shall require a secure logon process.
  - c. Formal user registration and de-registration process shall be in place for granting access to all IT systems as defined by business requirements. The issuance of authentication credentials shall be controlled through a formal management process.
  - d. All users shall be issued a unique identifier for their use only, and an approved authentication technique shall be used to substantiate the identity of each user. Users shall protect authentication credentials issued to them from unauthorized use.
  - e. The allocation and use of elevated privilege and special accounts shall be restricted and controlled.

- f. Information Controllers shall formally review user access rights at least annually and ensure access changes are documented
- g. It is recommended that remote access to internal School Authority systems require multi-factor authentication.
- 6. The School Authority shall prepare and implement an incident response plan to identify and manage breaches of security or privacy. Post-incident reviews shall be conducted to assess and improve the incident response plan and to mitigate future information security incidents.
  - a. School Authority standards for security incident management shall be followed to determine the criticality of information security incidents, identify appropriate responses including stakeholder communication, and manage remediation activities.
  - b. Detection, prevention and recovery controls shall be implemented to protect IT systems against malicious code (malware) and intrusions.
- 7. Information security and privacy shall be ensured as required by the Legislation in relevant School Authority policy, procedures and, if applicable, contractual clauses, insofar as they may affect or involve PASI data.
- 8. Audit logs recording user activities, exceptions, faults and information security events shall be produced, protected and monitored. Results of the monitoring activities shall be regularly reviewed.
  - a. Activities of operators and administrators shall be logged, protected, monitored, and regularly reviewed.

SECTION 8  
BOARD GOVERNANCE POLICY

**Background:**

The Board of Bragg Creek Education Services Association is respectful of the legislative authority granted it as a not-for-profit educational organization and is committed, through its membership, structure, and processes, to advance the school's mission, vision, and long-term viability. The Board accepts responsibility for all aspects of the organization, including overseeing its operations and holding the CEO/school principal accountable for delivering on the mission of the organization. Further, the board recognizes its unwavering obligation to make decisions that are in the organization's best interests.

The Board recognizes that it holds the responsibility for appropriate fiscal management by ensuring

- 1. that short and long-term financial jeopardy is avoided
- 2. that budget-planning assumptions are established
- 3. that expenditures from reserve funds are pre-approved as are transfers between operating reserves, capital reserves and committed operating surplus, and
- 4. that financial and accounting best practices are adhered to. At the same time, the Board recognizes that it must also engage effectively in strategic decision-making and generative governance practices to achieve its desired organizational outcomes.

The board, as a corporate entity, and each of the board directors, recognizes and is committed to a duty of care to the organization (that is, acting with the competence and diligence that a reasonably prudent person with similar knowledge and expertise would exercise in comparable situations) and to a duty of loyalty (that is, acting honestly and in good faith in the best interests of the organization).

The Board acknowledges and supports that the employer relationship with employees, volunteers, delegates, children, and community based programs is founded upon trust and commitment to the Board's mission and activities. Individual members must therefore remain cognizant of the fundamental board principles outlined above, in particular, those of neutrality and impartiality. Individuals must refrain from undertaking any activities that are perceived to be or are in conflict of interest with the governing body's mission or activities.

Recognizing that good governance is the key to the success of the school operation, the Board consistently endeavors to govern through policy leadership, which includes not only governance policy development and approval but also the ongoing monitoring and evaluation of policy implementation, thus supporting the Board's efforts in ensuring the sustainability and continuing growth of the school.

## Legal Reference

- Alberta Regulation (AR 84/2019) (Certification of Teachers and Teacher Leaders)
- Alberta Regulation (AR 126/2022) (Early Childhood Services)
- Alberta Regulation (AR 127/2022) (Private Schools)
- Companies Act (Part 9)
- Education Act
- Practice Review of Teachers and Teacher Leaders Regulation (AR 92/2019)
- Public Interest Disclosure (Whistleblower Protection) Act
- Societies Act

## Definitions

Annual General Meeting:	means the Annual General Meeting of the society or not-for-profit company;
Board:	means the board chair and board of directors, acting together as a corporate body, according to the bylaws of the organization, whose role is to provide governance leadership and to assure optimal outcomes for the learners and the communities they serve;
Bylaws:	means, in these procedures, the fundamental governing rules and regulations of the organization, as established under the Societies Act or through its registration as a non-profit company under Part 9 of the Companies Act or under the provisions of a special Act of the legislature. The bylaws state how the society is to be governed and how the powers of the society/not for profit are to be exercised;
CEO/Executive Director/ Head of School:	means an individual, who may or may not be the principal, that is employed by the board and authorized to provide overall administrative and operational leadership for the organization;
Conflict of Interest:	means, in these administrative procedures, any situation in which a board member is in a position, either real or perceived, to exercise significant influence over another and to derive unwarranted benefit from actions made in their official capacity;
Director:	means an individual member of the Board, appointed/elected at an Annual General Meeting in accordance with the terms set out in the society or not-for-profit company bylaws, whose role is to assist with the governance functions of the organization;
Governance:	means the process by which the organization assures outcomes and includes the actions undertaken by the board to establish and implement policy;
Generative Leadership in governance:	means consideration of the underlying meaning or long-term implications of an issue. In its generative mode, the Board's central purpose is to be a source of leadership for the organization by discerning challenges and opportunities; and probing assumptions, logic and the values behind strategies;
Fiduciary Leadership in governance:	means the exercise of legal responsibilities of oversight and stewardship including the responsible allocation and management of financial resources;
Parent:	means, for the purpose of this Procedure, any individual who meets the definition as set out in the Education Act S.1(2);

Principal:	means, in these procedures, an individual who is authorized through the Registrar and by an Alberta Leadership Certificate, letter of authority, or Temporary Leadership Certificate to provide educational leadership in an accredited private school; also known as the Director of Education.
Professional Competence:	means the professional practices of a teacher and/or teacher leader which are consistent with the professional practice standards required of teaching professionals in Alberta;
Representative of the board:	means, in these procedures, an individual that may be identified and authorized from time to time by the Board to carry out specific functions related to certain matters (reviews, investigations, etc.) not delegated to the school administration;
School Community:	means the parents, children, staff, board members and others most invested in the success and well-being of the school;
Secretary-Treasurer:	means, in these administrative procedures, a qualified individual, appointed by the board and authorized to carry out functions related to financial planning, reporting and accountability.
Senior Manager:	<u>Senior management employee/contractor</u> means an individual employed/engaged by the operator of a funded private school to plan, direct or control the management, administration and operation of the funded private school, this includes a member of the governing body of the operator of a funded private school who is an employee of the operator; also known as the Director of Operations.
Stakeholders:	means representatives, children, parents, community members, partnering organizations or others who share a common interest in the organization;
Strategic Leadership in Governance:	means decision-making about resources, programs and services for education to reflect longstanding priorities and emerging trends and issues;
Teacher:	means, in these procedures, an individual who is authorized, by an Alberta Teaching Certificate or letter of authority, to teach in an accredited private school;
Teacher-leader:	means, in these procedures, an individual that holds a Leadership Certificate and has authority to work as a Principal in an Alberta accredited private school; and
Unprofessional Conduct:	means conduct of a teacher or teacher leader that is inconsistent with the professional conduct requirements set out in the Certification of Teachers and Teacher Leaders Regulation and not in keeping with the interests of children, the public, teachers or teacher leaders.

### **Procedures**

Good governance is recognized as a critical function of child success and organizational goal achievement. Not-for-profit independent school boards must meet legal and fiscal accountability requirements and must also ensure the sustainability and continuing development of the schools and children they serve. A Board aspiring to “best practices” in governance attends to matters across a range of fiduciary leadership, strategic leadership and generative leadership priorities, consistent with those identified below.

Regarding Fiduciary Leadership, the Board shall:

1. Operate according to the respective bylaws of the organization as approved or amended annually at the AGMs and in accordance with the Societies Act, Companies Act (s.9) or other legislated authority.
2. Engage in the management of the business and affairs of the society/non-profit company, and the operation of the society/non-profit company, while exercising its powers and duties in compliance with the bylaws of the organization, the Societies Act/the Companies Act, the Education Act and all other applicable laws of Alberta and Canada.



3. Ensure that the Board membership, the roles and specific duties of the chair and directors and the procedures for meetings of the Board are consistent with the applicable sections of the society/company bylaws.
4. In accordance with section 17 of the ECS regulation, in force September 1, 2023, ensure more than half of the members of the governing body are independent and that this portion must be maintained for quorum (Applicable to ECSs only).
5. Appoint a secretary and treasurer or secretary-treasurer who is not the chair/president of the board.
6. Ensure, through delegation to the CEO or otherwise through board authorization, the appointment of an individual to act as the principal of the school, where the individual is appropriately qualified under the Certification of Teachers and Teacher Leaders Regulation and where the individual may not be the operator of the school or a voting member of the board of directors of the Society/not for profit Company operating the school.
7. Designate, in the case of a stand-alone private ECS Operation, a teacher certificated under the Certification of Teachers and Teacher Leaders Regulation to be responsible for evaluating teachers related to permanent certification.
8. Ensure that persons employed in the school as teachers or as teacher leaders meet the requirements for certification as identified in the Certification of Teachers and Teacher Leaders Regulation.
9. Appoint as auditor a professional accounting firm registered under the Chartered Professional Accountants Act and authorized to perform an audit engagement. ECS operators receiving grants of less than \$250,000 are exempt from audit requirements.
10. Annually approve and submit in the form prescribed and by the appropriate date, a(n):
  - a. Budget;
  - b. Audited Financial Statement;
  - c. Education Plan; and
  - d. Education Results Report
11. Identify and establish procedures for managing organizational risks (health and safety, cyber security, financial, legal, reputational):
  - a. Establish, keep in force and periodically review liability insurance and fidelity bond protection to ensure alignment with Early Childhood Services Regulation and/or Private Schools Regulation (AR 126/2022 and AR 127/2022);
  - b. Establish a protocol aligned with the Public Interest Disclosure (Whistleblower Protection) Act to facilitate the disclosure and investigation of significant and serious matters that employees believe to be unlawful, dangerous or injurious to the public interest; and
  - c. Ensure that the organization's duty to disclose information under section 32 of the Public Interest Disclosure Act is undertaken when/if necessary and reported as a disclosure in the school's Annual Education Results Report.
12. Ensure that policies are in place to address the specific requirements of the Education Act, including:
  - a. Providing for a welcome, caring, respectful and safe learning environment (Education Act 33(1)d) which addresses bullying behaviour 33(2) and contains a code of conduct 33(3);
  - b. Supporting child organizations 35.1(1) to 35.1(5); and
  - c. Establishing a process for appeal of organizational decisions to the board (42)(1) to 42(2) and 42(4) to 42(8);
  - d. Ensuring adherence to Education Act s.218 (Duty to Report) regarding the board's requirement to report to the Minister the suspension, termination, resignation or retirement from employment of a teacher where the suspension, termination, resignation or retirement results from conduct that brings into question the suitability of a teacher to hold a certificate of qualification as a teacher.
13. Ensure that policies and/or procedures are in place to address the specific requirements of Alberta Regulations and policies, including the Private Schools Regulation, the Early Childhood Services Regulation, the Child Record Regulation, the Funding Manual For School Authorities in Alberta and the Guide for Private School Education Planning and Results Reporting. Policies should include, but are not limited to:
  - a. Applications for Registration (ECS Only)
  - b. Assessment of Children (Schools)/Evaluation of Children (ECS)
  - c. Supervision, Evaluation & Professional Growth of Teachers & Teacher Leaders
  - d. Safety for Outdoor Education and Field Trips
  - e. A Health Protocol
  - f. Internal Controls
  - g. Roles and responsibilities of Senior Managers
  - h. Board Governance Policy, including Roles and Responsibilities of the Governing Body

- i. Conflict of Interest
  - j. Matters Pertaining to the Compensation of Senior Managers  
The board shall further ensure that all of the above policies as outlined in sections 10 & 22 of The Private Schools Regulation (AR127/2022) and in sections 5 & 18 of The Early Childhood Services Regulation (AR126/2022) are made publicly available before the start of the school year.
14. Establish and communicate procedures regarding the resolution of disputes or concerns that may arise at the school level between or amongst children, parents or school staff, including any identified roles for the Board, or authorized representative of the Board, in hearing unresolved child or staff complaints related to:
- a. Allegations of discrimination or harassment;
  - b. Allegations of unprofessional conduct and/or incompetent practice by teachers or teacher leaders; or
  - c. Any other matter identified by the Board

Regarding Strategic Leadership, the Board shall:

1. Commit to the foundational purposes upon which the school is established and adhere in decision-making, as governance leaders, to the school's mission, vision and values.
2. Recognize that a paramount role of the board of directors is to provide strategic direction to the organization and be collectively accountable for the results.
3. Acknowledge and communicate publicly to the organization membership that the board of directors is accountable for:
  - a. Child Learning - establishing the vision, mission, values, beliefs; participating in the development of, and approving, the strategic plan and results report; establishing additional priorities and monitoring achievement;
  - b. Fiscal Responsibility - maintaining active involvement in annual budget development and approvals, regularly reviewing the school's financial position against budgets and forecasts; deliberating about and approving tuition, transportation, and supplemental fee structures; providing stewardship of audit processes and receiving audit reports annually; establishing financial priorities (including significant fundraising campaigns) and providing overall financial oversight; developing and maintaining a Financial Accountability Policy.
  - c. Policy Development -providing overall direction through the development of governance policy, consistent with the vision, mission, values, goals and priorities of the organization, and consistently reviewing the impacts and outcomes associated with the implementation of these policies;
  - d. Facility Modernization/Maintenance -providing guidance to and oversight related to facility development and improvement; developing and approving strategies for facility modernization;
  - e. Board Development - ensuring, through such means as the development of an annual workplan, that the board of directors is collectively committed to professional learning as a governance team; and
  - f. Political Advocacy/Stakeholder Engagement - identifying and acting on advocacy goals of the Board; developing opportunities to engage with stakeholders of the organization.
4. In a manner consistent with the bylaws of the organization, establish Board processes/guidelines for:
  - a. Selecting the critical role of board chair;
  - b. Establishing responsibilities of board members; and
  - c. Determining and defining the number and purpose of board committees necessary to fulfill board functions.
5. Acknowledge and communicate publicly to the organization membership that the board of directors is individually and collectively accountable to:
  - a. Stakeholders;
  - b. The Alberta government through its representative, the Minister of Education; and
  - c. The Board as a corporate entity.
6. Expect all directors to conduct themselves with a high level of integrity and in accordance with ethical standards in all applicable legislation.
  - a. Implement and regularly review accountability processes related to board decision-making and financial management practices to ensure transparency, to ensure alignment with all relevant legislation and regulations, and to mitigate any potential risks related to conflict of interest;
  - b. Develop and implement a code of conduct applicable to all directors; and
  - c. Ensure the practices and actions of all board members are consistent with the mission, values and goals of the organization and with all related board policies.
7. Approve agendas and facilitate meetings of the board in accordance with the bylaws of the organization.

- a. Keep records of meetings, committee decisions and communicate outcomes as appropriate to the nature of the decision.
- 8. Establish clear corporate direction for the CEO/principal, recognizing the necessary delineation between the governance function of the board and the executive/administrative functions of the CEO/principal.
- 9. Articulate in policy the criteria and process(es) to be used in the selection of a CEO and/or a principal whose qualifications are consistent with best practices in organizational leadership, with the mission, values and vision for the school and with any related legislative requirements.
  - a. Delegate in writing the administrative authority of the CEO/principal and clarify respective responsibilities and accountabilities;
  - b. Develop and approve processes for the evaluation of the CEO/principal that link to the board's position descriptions for these roles, board approved leadership performance criteria and, with respect to the principal, a direct reference to the Alberta Leadership Quality Standard; and
  - c. Ensure regular review of the compensation awarded to the senior managers, ensuring alignment with regulations (AR126/2022) and (AR127/2022).

Regarding Generative Leadership, the Board should:

- 1. Regularly review statements of the school's mission, vision and values, both at the board level and also with the membership of the organization, to ensure alignment with strategic planning and school priorities.
- 2. Annually evaluate the board's effectiveness in achieving established priorities and desired results.
- 3. Prioritize time at board meetings and commit to engaging in ongoing dialogue about how the board is meeting its strategic and fiduciary responsibilities.
- 4. Provide advocacy for the school by:
  - a. Planning for advocacy including focus, key messages, relationships and expanded opportunities;
  - b. Engaging in public communications about the school, as appropriate, to promote a positive identity for the school; and
  - c. Promoting regular meetings and maintaining timely, frank and constructive communication with government, locally elected officials and collaborative organizations.
- 5. Provide the resources necessary to support leadership capacity building amongst teachers, school leaders and board members alike.
- 6. Establish board member and school leadership succession plans to strengthen the likelihood of successful transitions when board membership changes or when school leadership changes.
- 7. Ensure that parents of all children have opportunities to be involved and engaged in supporting successful outcomes for their children and for the school.
- 8. Develop and maintain multiple communication links with the school community.
- 9. Make informed decisions that consider school community values and represent the interests of the Society/not-for-profit Company.
- 10. Demonstrate wherever possible how feedback and input from society and/or not-for-profit company membership has been used to strengthen school programming and development.
- 11. Ensure that the Annual General Meeting of the Society/not-for-profit Company is carefully planned to provide the membership with a comprehensive and transparent communication about the board's work and about the success of the school.

## SECTION 9 FINANCIAL AND GOVERNANCE POLICY

### **Background:**

Bragg Creek Education Services Association is committed to ensuring transparency and accountability in all financial processes. Throughout its processes, the school will implement internal controls to minimize the opportunity for mismanagement of processes. In general, these controls consist of:

- 1. Segregation of duties

2. Controlling access to accounting systems
3. Physical audits of assets such as cash, inventory, investments and capital assets
4. Standardized documentation such as invoices, receipts, deposits, expense claims
5. Regular trial balances to identify discrepancies
6. Periodic reconciliations, such as a monthly reconciliation of bank statements with the school's financial records
7. Approval authority requirements such as having a supervisor sign off on orders of classroom supplies over a predetermined value
8. Outlining compensation of senior managers in accordance with current regulations
9. Placing Fair Market Value restrictions on all related party transactions
10. Investments

### Definitions:

Cardholder: An individual authorized to hold and use a school credit card

Fair Market Value: Fair Market Value (FMV) is the price a product would sell for on the open market assuming both the buyer and seller are reasonably knowledgeable about the asset, are behaving in their own best interests, are free from undue pressure, and are given a reasonable time period for completing the transaction. The *Early Childhood Services Regulation (AR 126/2022)* outlines that FMV must be determined by an accredited appraiser of the Appraisal Institute of Canada. (Section 24(6))

Independent member: a member of the governing body of a private ECS operator who

1. is not involved in the day-to-day management, administration or operation of the early childhood services program provided by the private ECS operator, and
2. is not a related party of another member;

Internal Controls: Internal Controls are policies and procedures put in place to ensure the continued reliability of accounting systems.

Related Party Transaction: A related-party transaction is a deal or arrangement between two parties who are joined by a pre-existing business relationship or a common interest. For example, a school decides to lease property from one of the school's directors. Organizations often seek to secure business arrangements with parties with whom they are familiar or have common interest. While these types of transactions are legal, they could potentially create conflict of interest or lead to situations that are illegal or unethical. Organizations will want to create procedures for approving these transactions so as to safeguard against potential abuses

Senior Manager: **"Senior management contractor or employee"** means an individual engaged or employed for services by the operator of an early childhood services program to plan, direct or control the management, administration and operation, this includes a member of the governing body of the operator of a funded private school who is an employee of the operator. Bragg Creek Education Services Association also refers to this individual as the Director of Operations.

## ROLES AND RESPONSIBILITIES OF GOVERNING BODY AND SENIOR MANAGERS OF THE INDEPENDENT ECS

### Governing Bodies

1. The school will outline the roles & responsibilities of its governing body with respect to financial matters. These may include, but are not limited to:
  - a. Approving the annual budget for the upcoming school year
  - b. Annually appointing an auditor
  - c. Reviewing, signing and submitting to the minister the AFS and copies of the auditor's recommendations respecting the operator's internal controls and accounting procedures

- d. Regularly reviewing in-year reports on actual results compared to budget and previous years results and explaining discrepancies. These reports may include a *Statement of Financial Position* (Balance Sheet) and a *Statement of Operations* (Income and Expenditures)
- e. In light of auditor's recommendations, annually approving the schools updated *Financial Accountability Policy*

#### **Senior Managers**

- 2. The school will outline the roles and responsibilities of the senior manager(s) with respect to financial matters. These may include, but are not limited to:
  - a. Implementing financial management policies established by the board
  - b. Ensuring that the board has access to all financial documents required for them to carry out their roles and responsibilities

#### **Related Party Agreements**

- 3. Bragg Creek Education Services Association's policies and procedures in respect to transactions involving real or personal property or engaging in services with a related party for the purposes of managing, administering or operating the school align with the *Early Childhood Services Regulation (AR 126/2022)*, Section 24. Transactions involving property and the engagement of services will happen at Fair Market Value.

#### **Compensation of Senior Management Employees**

- 4. Bragg Creek Education Services Association's policies for compensation of senior managers align with Section 22 to 32 of the *Early Childhood Services Regulation (AR 126/2022)*. For the 2024 school year and until further change of the regulations, the base salary of a full-time senior management employee will not exceed the maximum base salary applicable to a level 2 board under Schedule 1 to the *Superintendent of Schools Regulation (AR 98/2019)* and no bonus, allowance or other incentive will be paid in addition to the senior management employee's base salary.

### **FINANCIAL AND GOVERNANCE POLICIES**

#### **Segregation of Duties**

- 1. The Board of Bragg Creek Education Services Association is committed to ensuring the proper use of funds by the segregation of duties as required. At a minimum the four following areas are to be separated:
  - a. Transaction authorization or approvals
  - b. Custody of assets
  - c. Recording transactions
  - d. Reconciliation/Control activity related to bank statements, accounts, deposits
  - e. Approving timesheets

#### **Capital Assets**

- 2. The Board of Bragg Creek Education Services Association is committed to confirming that all capital assets are properly accounted for by ensuring that there is:
  - a. Authorization or approval for expenditure
  - b. Authorization or approval for disposal
  - c. Verification of title to asset purchased
  - d. Periodic audit of fixed asset inventories

#### **Reimbursement of Expenses**

- 3. The Board of Bragg Creek Education Services Association is committed to confirming that all expense claims and reimbursements are properly accounted for by ensuring that there is:
  - a. Clearly defined expense reimbursement procedure
  - b. Original receipts attached to all claims
  - c. Supervisor review and approval prior to submission for payment
  - c. Periodic audit of employee reimbursement claims

**Investments**

4. The Board of Bragg Creek Education Services Association is committed to safeguarding all investments by ensuring that there is:
  - a. A clearly defined approved investment policy document
  - b. Compliance letter confirmations as applicable for external investment advisors
  - c. Verification of title to investments purchased
  - d. Reconciliation of investments to monthly statements

**Transfer of Grants**

5. Bragg Creek Education Services Association will follow regulations with regards to transfer of grants and may only transfer a grant or portion thereof to:
  - a. The Government of Alberta
  - b. A society under the *Societies Act* or non-profit company registered under part 9 of the *Companies Act* that:
    - i. Provides an early childhood services program
    - ii. Provides program support to an early childhood services program
  - c. Operator of a charter school or funded private school