

Process For Monitoring Compliance and Contraventions

General Compliance and Contravention Indicators

Prior to the start date of employment, all staff, volunteers, and students will review all policies and procedures documentation. All policies and procedures will subsequently be reviewed annually or in any instance where changes are made. A staff logbook will be maintained indicating the policies reviewed with the date of completion and will be signed by both the staff member and program supervisor. As a staff member counting within program ratio, the program supervisor will observe staff compliance on a day-to-day basis and will review their observations with staff when it is deemed necessary, or minimally, twice a year during performance review meetings.

Policy review will also include documents for any individualized plans for children with anaphylactic allergies or other special needs. Individualized plans will be reviewed annually, or at any point where a child who requires an individualized plan enters the program.

Records for policy and procedure reviews will be kept in a secure location for up to three years.

Whenever necessary, contraventions to policies and procedures will be noted in the Staff Contraventions Log and kept on file for up to three years. Any contraventions put in writing will be reviewed and signed by both the staff member and program supervisor. Situations requiring contraventions to be logged will be at the discretion of the program supervisor and in accordance with policy specific monitoring practices.

Policy Specific Compliance and Contravention Indicators

Anaphylactic Policy Compliance

In accordance with the CCEYA, all staff must be certified in Standard First Aid and CPR Level C before the start date of employment. Copies of certifications will be kept in the staff member's file and checked periodically by the program supervisor to ensure it is up to date.

When a renewal of Standard First Aid or CPR Level C certification is required, it must be completed within 15 days of the expiry date. Failure to complete the re-certification within the allotted time may result in suspension of employment until the staff member is able to complete it.

It is the responsibility of the program supervisor, or an alternative staff member appointed by the program supervisor, to ensure that any medications (Including Epi-pens) are stored in a secure location and are not expired. It is the responsibility of the program supervisor, or an appointed staff member, to check the expiration dates of all medications on a monthly basis and sign and date the medication log. Any medication that is expired will be returned to the parent or guardian to be disposed and will be replaced prior to the date of expiry.

Cleanliness and Sanitation Policy Contravention Protocols

With regards to the Sanitary Practices Policy, the following steps will be taken, at the discretion of the program supervisor, to address contraventions by a staff member.

- First contravention – Staff will be reminded by the supervisor of the proper procedures.
- Second contravention – Staff will be required to review, date and sign the Sanitary Practices Policy
- Third contravention – A note will be made in the staff contraventions log by the program supervisor, indicating the nature of the infraction, signed and dated by both the staff member and program supervisor.
- Fourth contravention – A second note will be made in the staff contraventions log, signed and dated by the staff member and program supervisor. A meeting with the supervisor will take place to develop an action plan to prevent further issues, and to review the potential consequences of future transgressions.
- Fifth contravention – A third note will be made on the staff members file, signed and dated by the staff member and program supervisor. At this point, and at the discretion of the program supervisor and/or director, termination of employment is possible.

Serious Occurrence Compliance and Contraventions

In the event of a serious occurrence, all actions by staff members will be documented, to the best of our abilities, on the serious occurrence form and reviewed by the program supervisor/director. At the discretion of the program supervisor, a meeting will be held afterwards to discuss any issues with how the serious occurrence was handled and any adjustments that should be made for the future.

If a serious occurrence happens as a result of actions taken by a staff member, it will be addressed by the program supervisor and/or director on a situational basis. Depending on the severity of the occurrence, repercussions may range from a discussion with the program supervisor accompanied with a review of the policies and procedures to termination of employment.

Medication Policy Compliance Procedure

To uphold compliance with the medication administration policy, it will be the responsibility of the program supervisor, or an alternative staff member designated by the program supervisor, to administer and document on the medication administration form the provision of any medications.

Prior to the provision of any medications, it is the responsibility of the program supervisor to ensure that the medication administration request form is filled out and signed by the parent or guardian.

Supervision of Volunteers Policy Compliance and Contravention Procedures

In the event that a staff member leaves a volunteer alone with children, the following contravention procedures will occur;

- First occurrence - A note will be made in the staff contraventions log by the program supervisor, indicating the nature of the infraction, signed and dated by both the staff member and program supervisor. The program supervisor will also remind the volunteer that, at no point, should they be left alone with children in the program
- Second occurrence – A second note will be made in the staff contraventions log and a meeting will be arranged to discuss the infraction with the program supervisor and/or director. Depending on the severity of the infraction, and at the discretion of the program supervisor / director, termination of employment is possible.

Program Statement Implementation Policy Contravention Protocol

Contraventions to the Program Statement Implementation Policy will be addressed by the Program Supervisor and/or Director on a situational basis, specifically regarding contraventions of prohibited practices. Dependant on the severity of the contravention, and at the discretion of the Program Supervisor and/or Director, actions taken could include, but are not limited to;

- A verbal reminder of the policies and procedures by the Program Supervisor
- A written note in the Staff Contraventions Log, signed, dated, and reviewed by both the staff member and Program Supervisor
- Termination of employment

Staff Training and Development Policy Contravention Procedures

To facilitate compliance with attending staff training and development workshops, all mandatory training meeting dates will be set at a minimum, one month in advance of the training date.

If a staff member is unable to attend a mandatory training, the staff member must provide a doctor's note indicating illness or provide evidence of a justifiable reason for their absence. It will be at the discretion of the Program Supervisor to determine if the reason for absence is justifiable.

In the event that a staff member is absent from a mandatory training session, and is unable to provide a justifiable reason for said absence, the following procedures will be implemented by the Program Supervisor;

- First contravention – A note will be made in the staff contraventions log by the program supervisor, indicating the nature of the infraction, signed and dated by both the staff member and program supervisor. A meeting with the supervisor will take place to develop an action plan to prevent further issues, and to review the potential consequences of future transgressions.
- Second contravention – A second note will be made in the Staff Contravention Log and the Program Supervisor will implement the consequences discussed in the previous meeting, with the possibility of termination of employment.

Criminal Reference Check Policy Compliance and Contravention Procedures

Prior to the start of employment, all employees must provide a Vulnerable Sector Check (VSC) valid within six months prior to the start of employment. At the discretion of the Program Supervisor, an employee may begin their employment without a VSC if they are able to provide evidence that the screening is in process and will be completed within a reasonable timeframe. Prior to the start of employment, and on an annual basis thereafter, all employees must also complete a Criminal Offence Declaration.

On an annual basis, it is the responsibility of the Program Supervisor to review all employees' documentation to ensure it is current and valid. The Program Supervisor will also ensure that all staff members update their documentation within 15 days after the expiration. If a staff member is unable to provide an updated VSC or COD within 15 days of expiration and are unable to provide evidence that it will be completed within a reasonable timeframe, it may result in suspension of employment until the time that they are able to provide the appropriate documentation.

Fire Evacuation Policy Compliance Protocol

It is the responsibility of the Program Supervisor to conduct a fire evacuation drill on a monthly basis. The Program Supervisor, or an alternative staff member appointed by the Program Supervisor, will document the time and date of the fire drill. After a fire drill has been conducted, the Program Supervisor will hold a brief meeting to discuss any issues or concerns.

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