1. PURPOSE

The Behaviour Support and Safety Planning Policy outlines requirements for service providers who support individuals with challenging behaviours in CLBC-funded services. This policy clarifies that Safety Plans are required when restricted practices are a planned response to de-escalate unsafe behaviours.

The Behaviour Support and Safety Planning: A Guide for Service Providers accompanies this policy. It outlines key concepts and requirements for service providers concerning behaviour support and safety planning. The guide is referred to as A Guide for Service Providers throughout this policy.

This policy outlines CLBC staff responsibilities for monitoring service provider adherence to this policy and requirements outlined in A Guide for Service Providers.

2. DEFINITIONS

**Behaviour Support:** A set of interventions developed to support individuals with challenging behaviour. These behavioural interventions are designed to improve an individual’s quality of life, are functionally based and are integrated with person-centred planning.

**Behaviour Support Plan:** An individualized, written document developed to support individuals with challenging behaviour. It outlines specific behaviour support interventions, strategies, and implementation requirements.

**Behavioural Consultant:**

i) A professional with graduate qualifications (i.e., has completed a Bachelor’s and Master’s or Doctoral degree in Clinical or Educational Psychology or Special Education) or

ii) A Board Certified Behaviour Analyst or

iii) A person who has completed a Bachelor’s degree and is under the clinical supervision of a professional with graduate qualifications (as above) and is either:

   a. In the process of completing graduate work, or

**Personal Summary:** A document created by a youth or adult and their family, with support from others as needed, that helps CLBC and other planning partners get to know who the person is, what is important to and for them and, where relevant, their support requirements. It can assist CLBC and others with planning, and with gathering information to complete assessment documents required to request support and/or funding through CLBC. The document is the individual and/or family’s personal property.
**Prohibited Practices:** Actions that are reliant on fear, pain, or threats, or that constitute an infringement on the fundamental human entitlements or rights of an individual.

**Restricted Practices:** Techniques or strategies that limit an individual’s behaviour or freedom of movement including:
- Restriction of rights. This involves removing access to activities for an individual. Restriction of rights must never include taking away adequate food, adequate clothing, adequate heat, access to health care, suitable shelter or safety, or reasonable access to family members.
- Exclusionary time-out
- Restraint, except where it is for **medical purposes only** as prescribed by a health care professional, and is not required for behavioural purposes

**Safety Plan:** An individualized, written document designed to address situations where unsafe behaviour has the potential to harm the individual or those around them. The Safety Plan outlines the strategies and procedures to respond to the behaviours and reduce risk. Safety Plans can **only** be developed as an adjunct to or in conjunction with an overarching Behaviour Support Plan.

**3. POLICY**

Behaviour support is a practical approach to address challenging behaviours by replacing them with positive social skills. It concentrates on understanding the context, triggers, and outcomes of behaviour for an individual and using this information to decrease the need for more intrusive interventions. Generally, this is achieved by reinforcing desired behaviours and modifying the environment to strengthen positive and participatory behaviour.

A **Behaviour Support Plan** must include the following:
- A functional behaviour assessment that focuses on the underlying function of an individual’s behaviour and how behaviour may serve as a means of communication for that individual
- A lifestyle review and strategies to modify or eliminate triggers
- An outline of desirable behaviours and objectives in context of an individual’s best interests
- Strategies for establishing or increasing desirable behaviours
- A process for managing emergency situations including establishing roles and detailing permitted and restricted practices
- A reference to training, feedback and ongoing communication and review
- Evaluation and a timeline for review (at least every 12 months)

Service providers are responsible for implementing Behaviour Support Plans for individuals who are exhibiting challenging behaviours that interfere with their learning and daily activities when the behaviours are likely to become severe if they are not addressed. Service providers are responsible to ensure that Behaviour Support Plans are developed with the involvement of the individual, their family and/or the individual’s support network, service provider staff, and others as required. A person with training and expertise in completing functional behavioural assessments and demonstrated expertise in developing multi-element behaviour support plans needs to lead the development of the Behaviour Support Plan. Service providers may involve Behavioural Consultants to assist with developing Behaviour Support Plans and assist the service provider to develop the internal capacity for developing Behaviour Support Plans.
The Behaviour Support Plan is a written document that evolves over time and outlines environmental changes, antecedent changes, replacement behaviours, consequence changes, and the strategies and activities that will be used to bring that about. The primary focus of any plan should be linked to person-centred planning, improving the quality of an individual’s life, and enhancing their capacity to engage in meaningful activities.

A Safety Plan is developed when an individual’s behaviour is unsafe and of such intensity, frequency or duration that the physical safety of the person or those nearby is put at risk. Service providers work with a qualified Behavioural Consultant to develop a Safety Plan. Restricted practices may only be used as a planned response to unsafe behaviour when they are outlined in a Safety Plan and required authorizations have been provided. In an emergency, restricted practices may be used without a Safety Plan or authorizations. (A detailed description of Safety Plans, examples of behaviour that may require a Safety Plan and criteria for implementation are included in A Guide for Service Providers.) A Safety Plan specifically addresses how to respond to the unsafe behaviours while reducing risk of harm to the individual and those around the individual. A Safety Plan can only be put in place as an adjunct to a Behaviour Support Plan or may be temporarily in place while a functional behaviour assessment is being conducted to develop a Behaviour Support Plan. A Safety Plan has specific, limiting requirements for development, approval and review.

Safety Plans that include restricted practices as outlined in A Guide for Service Providers must be authorized in writing by each of the following people:

- A qualified Behavioural Consultant (a qualified Behavioural Consultant is a Behavioural Consultant as defined in this policy)
- A physician
- A CLBC Integrated Service Manager
- The service provider
- The individual and/or their parent or family member or formal representative

Restricted practices needed for behavioural and medical purposes must be included in the Safety Plan and must be prescribed by a health care professional or included in a health care plan that identifies the need for the restriction.

Individuals, families and/or other support network members should participate in developing the Safety Plan. They must be fully informed about the rationale for its use including any proposed restricted practices.

The Safety Plan and any requests for reporting exemptions made under the Critical Incidents: Restraint Exemption Framework must be reviewed every six months by the service provider and the Behavioural Consultant to evaluate the effectiveness of the plan and its implementation. For any exemptions, a request for renewal must be made every six months. See the Critical Incidents: Restraint Exemption Framework for more detail. Documentation of the review process must be created, maintained, and submitted to CLBC every six months. CLBC’s 6-Month Safety Plan Review Form can be used for this purpose. Review of the Safety Plan may also indicate a need for more frequent review of the Behaviour Support Plan.

Compliance with the Behaviour Support and Safety Planning Policy is a contractual requirement of CLBC-
funded service providers. When restricted practices are employed, their use is reported as outlined in the CLBC Critical Incidents Policy and Community Care Licensing Regulations. Service providers must adhere to this policy and A Guide for Service Providers when developing and implementing a Behaviour Support Plan or Safety Plan.

Quality service analysts are responsible for monitoring service provider compliance with this policy and the requirements outlined in A Guide for Service Providers.

4. PROCEDURES

4.1 Facilitators are expected to:

- Be familiar with this policy and A Guide for Service Providers in order to identify potential needed resources for individuals with behavioural support needs when planning, or when assisting with and reviewing an individual’s Personal Summary
- Be able to answer questions and to inform individuals, families, and support network members about their rights and responsibilities in the behaviour support and safety planning process
- Immediately report any alleged use of prohibited practices to a quality service analyst

4.2 Quality Service Analysts are expected to:

- Be familiar with this policy and A Guide for Service Providers in order to assist service providers with the related contractual expectations
- Communicate with individuals, families, support network members, and advocates about their rights and responsibilities in the behaviour support and safety planning process
- Ensure that all service providers are aware of their contractual responsibility to comply with this policy and A Guide for Service Providers
- Review and approve requests for behavioural support
- Review and approve requests for accessing Behavioural Consultants when a Safety Plan is required
- Review Safety Plan documentation to confirm that required authorizations have been provided in writing and submit to the Integrated Service Manager for their authorization
- Monitor that Safety Plan reviews occur and are documented as required. This includes reviewing any reporting exemptions approved under the Critical Incidents: Restraint Exemption Framework.
- Monitor service providers’ compliance with this policy as part of ongoing monitoring activities
- Follow-up on specific situations where there is an increase in the use of restricted practices indicated by critical incident reports
- Follow-up on any findings of internal or external reviews or investigations
- Work with service providers to develop solutions to issues related to developing service provider capacity for behavioural support and safety planning

4.3 Service providers are expected to:

- Comply with this policy and A Guide for Service Providers and, as appropriate, have written internal policies, procedures, and documentation requirements outlining their behaviour support and safety planning approach
- Forward Safety Plans to the local CLBC office
- Ensure required authorizations are in place prior to implementing a Safety Plan
• Report use of restrictive practices and prohibited practices as outlined in the CLBC Critical Incidents Policy and Community Care Licensing Regulations

• Report on use of restraints that are exempt from reporting under the Critical Incidents Policy either at six month intervals along with Safety Plan reviews, or as required based on process outlined in the Critical Incidents: Restraint Exemption Framework. CLBC’s Critical Incidents: Request for Exemption Form can be used for this purpose.

• Inform CLBC of situations when they are having difficulty accessing a Behavioural Consultant and a Safety Plan is required

4.4 Integrated Service Managers are expected to:

• Ensure facilitators and quality service analysts are familiar with this policy and A Guide for Service Providers and comply with expectations outlined in this policy about staff roles.

• Authorize Safety Plans in writing after a quality service analyst has confirmed that all other written required authorizations have been provided.

5. DOCUMENTATION

5.1 The quality service analyst is responsible to ensure that:

• The Safety Plan, required written authorizations (including documentation explaining exceptional circumstances where the individual, their family and/or support network members have not authorized a Safety Plan) and documentation of the Safety Plan review process, is scanned into the Individual’s Site (Sharepoint) in PARIS.

• A copy of the written authorizations for the Safety Plan and documentation of the Safety Plan review process is placed in the service provider’s Vendor File.

6. PRACTICE

6.1 The individual, their family, and/or support network members should always be involved in behaviour support and safety planning. The way that they participate will vary and will depend on many factors, but their participation must always be sought. In exceptional circumstances where it is not possible or appropriate for the individual, their family, and/or support network members to participate or authorize a Safety Plan, the service provider needs to document an explanation about why they have not participated and submitted with other required authorizations.

6.2 This policy and A Guide for Service Providers outline an approach which promotes constructive concepts, processes, language, and requirements for behaviour support and safety planning. The approach is important for both service providers and CLBC staff. CLBC staff and service providers should create opportunities to discuss and develop this approach.

6.3 When an individual is exhibiting challenging behaviour it is important to determine if there are straightforward reasons for the behaviour before a Behaviour Support Plan (and Safety Plan) is developed. Ruling out any possible medical or dental issues is an important part of the process.

6.4 A physician is required to provide written authorization for a Safety Plan to ensure that the individual has no known underlying conditions that indicate the strategies identified in the Safety Plan (i.e., the use of physical or mechanical restraints) would be unsafe for the individual.
6.5 Behaviour support is an active, long-term process. Positive change can take years, transitions can increase the challenges, new staff or people can enter a person’s life, and behaviours can get worse before the interventions and strategies make a positive difference. CLBC staff and service providers must have a long-term perspective where persistence and consistency are key strategies.

6.6 CLBC staff and service providers must work together to ensure that service providers have opportunities to develop capacity for providing positive behavioural support and for gaining access to Behavioural Consultants when required for safety planning.

6.7 In some cases the first signs of behavioural challenges are overlooked and later interventions must be more intensive and time consuming. Service providers and CLBC staff should be alert for early indications of new or increasing behavioural challenges. A preventative strategy implemented in a timely, proactive manner is always good practice.

6.8 CLBC may conduct periodic internal practice reviews and external reviews to monitor the effectiveness of Behaviour Support Plans and Safety Plans. When the use of a Safety Plan does not lead to a decrease in unsafe behaviour and decreased use of restricted practices in a specific situation, a CLBC internal practice review or an external review of the Behaviour Support Plan and the Safety Plan may need to be arranged.

6.9 In certain limited circumstances, a CLBC Director, Regional Operations may make an exception related to the requirement for a Behavioural Consultant to authorize a Safety Plan in order to allow a professional with training and expertise in completing functional behavioural assessments, and demonstrated expertise in developing multi-element behaviour support plans to authorize a specific Safety Plan. A Director, Regional Operations may consider an exception if the CLBC quality service analyst, Integrated Service Manager and the service provider are in agreement and present a written request for an exception to the Director, Regional Operations. The proposed professional must have extensive demonstrated competence in functional behaviour assessment and the development of Behaviour Support Plans and Safety Plans. The written request must outline the extensive experience of the proposed professional. If, after one year the use of permitted restricted practices has not diminished, a Behavioural Consultant must review the situation.

7. REFERENCES

Community Care Licensing Regulations
Critical Incidents Policy
Critical Incidents: Request for Exemption Form
Critical Incidents: Restraint Exemption Framework
Cultural Safety Policy
Personal Summary
6-Month Safety Plan Review Form
Standards for Home Sharing
Standards for Home Sharing Policy
Standards for the Coordination of Home Sharing
Standards for the Coordination of Home Sharing Policy