PANDEMIC RESPONSE FRAMEWORK
And Pandemic Planning Guidelines for School Districts

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Ministry of Education
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MINISTRY OF EDUCATION PANDEMIC RESPONSE FRAMEWORK

INTRODUCTION

All ministries across government have a structure in place to respond to and manage potential emergencies that threaten to disrupt the continuity of their respective Ministry’s business. The Ministry of Education has a Ministry Operations Centre (MOC) Plan, consistent with Provincial Government requirements.¹

The MOC is a temporary coordinating operation that is activated to respond to a disaster or major disruption in Ministry business. Once initiated, the re-establishment of Ministry business is implemented by individual workplace and business unit Business Continuity Plans (BCPs).

The MOC will be active during a pandemic. A pandemic is defined by the World Health Organization (WHO) as an epidemic of infectious disease that is spreading through human populations across a large region; for instance a continent, or even worldwide. A pandemic can start when three conditions have been met:

- emergence of a disease new to a population;
- agents infect humans, causing serious illness; and
- agents spread easily and sustainably among humans.

A disease or condition is not a pandemic merely because it is widespread or has potentially severe complications; it must also be infectious.

PURPOSE

The purpose of the Ministry of Education Pandemic Response Framework (Framework) is to support operational decision-making throughout a pandemic within the Ministry. The Framework includes a graded checklist (Appendix A) to guide the MOC throughout a pandemic event. Response checklists help to prepare and plan prior to the event and guide decision making during the event, ensuring critical steps are not overlooked.

Although the Framework is intended to guide government decision making, to make the response Framework functional within the larger context of the entire BC education system, it is critical that school districts have pandemic plans in place that will work within their local school settings. As such, the Framework will support the Ministry in its ability to provide assistance and guidance to school districts in their pandemic planning. Pandemic Planning Guidelines for School Districts are appended to the Framework (Appendix B).

¹ Incident Command System Model under the British Columbia Emergency Response Management System (BCERMS)
The Framework was initially developed in response to the spring 2009 outbreak of H1N1 and is applicable within the context of a pandemic influenza. However, the Framework is intended to guide decision-making through any pandemic, regardless of the trigger.

On April 28, 2009, Canada reported 6 laboratory confirmed cases of H1N1. At this same time, the World Health Organization (WHO) reported other laboratory confirmed cases in six other countries. On June 11, 2009, the WHO raised its alert level to phase 6 (the pandemic phase). The WHO considers the overall severity of the pandemic to be “moderate”, which means that most people recover from infection without the need for hospitalization or medical care.

As of August 21, 2009, the BC Centre for Disease Control had confirmed that 765 individuals in British Columbia have tested positive for the H1N1 flu virus that has caused illness in the U.S., Mexico and many other countries. However, the total number is believed to only reflect a small proportion of the cases in BC and other public health tracking measures demonstrate that H1N1 is circulating throughout the province. The H1N1 flu virus has shown a preference for younger people, with those aged five to 24 making up a larger proportion of cases. Up to date statistics for BC can be found at http://www.bccdc.ca/discond/DiseaseStatsReports/influSurveillanceReports.htm. The WHO reports that the situation is evolving with more cases and a second wave expected in the northern hemisphere in fall 2009.

Based on guidance from the Public Health Agency of Canada (PHAC) and the United States Centre for Disease Control (CDC), public health officials in BC do not anticipate that closures of individual schools, community wide closures or province wide closures will be useful for controlling the transmission and impact of H1N1. Local exceptions to this may infrequently arise which could result in school closures on a case by case basis.

The Framework, in combination with School District Pandemic Plans, will ensure the BC education system is prepared both for a resurgence of H1N1 in the fall of 2009, and for future pandemics.

The Framework complements both the Ministry’s business continuity plan and the School Closure Guidelines developed by the Ministry of Healthy Living and Sport and the Office of the Provincial Health Officer.

The Ministry of Education has worked collaboratively with the Ministry of Healthy Living and Sport and the Office of the Provincial Health Officer on the development of both the School Closure Guidelines and the Framework. The Ministry of Education looks to the Ministry of
Healthy Living and Sport and the Office of the Provincial Health Officer for their expertise and assistance on all public health-related issues.

The Framework also includes Pandemic Planning Guidelines for consideration by school districts.

MINISTRY OF EDUCATION PANDEMIC RESPONSE CHECKLIST – APPENDIX A

The checklist (Appendix A) will guide operational decision-making for the Ministry of Education during a pandemic. The checklist includes stages which reflect severity of the current event in terms of school closures. The 3 stages are aligned with the School Closures Guidelines. Below is a summary of the checklist stages which correspond to scenarios in the School Closures Guidelines.

Stage 1 – No school closures in BC

Stage 2 – School closures (either single or multiple school closures in a BC community)

Stage 3 – Regional or province wide school closures (multiple school closures in multiple communities across BC)

SCHOOL CLOSURES

Schools can act as amplification points for pandemics - in particular, influenza - and children and youth are thought to play a significant role in introducing and transmitting a virus within their households. There is limited and conflicting evidence about the effectiveness of school closures in preventing transmission and in reducing serious outcomes of influenza. Furthermore, closing schools in isolation of other social distancing measures (i.e. people staying home when ill, staggered work hours, telecommuting, closing theatres and churches, discouraging mass gatherings) may not have the desired effect in preventing community transmission.

The legal authority to close a school for public health reasons falls under the purview of the local Medical Health Officer and the Provincial Health Officer.

- The School Act requires health authorities to designate a school medical health officer for each school district in order to liaise between the health authority and the school district.

- The Medical Health Officer can require a Board of Education to close a school if there is a health risk to students.

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2 Also known as the school medical officer
• The Medical Health Officer must consult the Board of Education and the Provincial Health Officer prior to making his/her advice public.

• The *Public Health Act* also provides powers for the Provincial Health Officer and Medical Health Officers which may be used in the event of a serious pandemic to order closure of schools and other public places.

• A Board of Education has the authority to close a school on a required day of instruction if it believes the health or safety of students is endangered.

• A superintendent or principal may suspend an employee or student from a school for public health reasons subject to review by a school medical officer when the superintendent or principal believes the presence of the employee or student poses a danger or risk. A teacher may suspend a student for these same reasons in the same circumstances.

• The Minister of Education may direct a board to close a school through an administrative directive.
APPENDIX A

Ministry of Education Pandemic Planning Checklist

Stage 1: No school closures

*MOC*

☐ Has the Ministry Operations Centre (MOC) been activated?

☐ What changes, if any, need to be made to the MOC group? Consider the nature of the event.

☐ Have a sufficient number of trained (BCERMS//ICS) MOC members been pre-identified to staff the MOC for an extended period (taking into consideration that these members would also be subject to the risk of contracting the same illness)

☐ How often and when should the MOC meet? Set schedule.

☐ Are the roles and responsibilities of the MOC members clearly defined and have they been clearly communicated?

☐ Have methods been established to ensure accurate and timely documentation of issues and corresponding outcomes.

☐ Has someone been identified as the Ministry contact to provide Provincial Emergency Preparedness (PEP) and/or other groups with status updates and complete forms as required?

*Communications*

☐ What structure/mechanism is necessary for communicating with the field (Should there be regular conference calls? A designated contact person for the field to communicate with?)

☐ Who is the spokesperson for the Ministry for both internal and external – Deputy Minister? Minister of Education? Public Affairs Bureau (PAB) Director? Superintendent of Liaison?

☐ What communications need to be sent to staff? Who is the Ministry contact for public inquiries? Be sure to include that person’s contact information in the communications to staff.
☐ Is there important and relevant information that needs to be sent to students and families? Work with districts and schools to ensure accurate and consistent communications are sent to parents/students.

☐ Have you included prevention information in all Ministry communications to partners and stakeholders? Ensure tip sheets/fact sheets are up to date and contain current and reliable information. Ensure all communications are age appropriate and address potential language barriers.

☐ Have communication channels with the Ministry of Healthy Living and Sport (MHLS), Office of the Provincial Health Officer (PHO) and public health officials been established? Ensure that regular communication is established and maintained.

☐ Has a mechanism been established for tracking media issues/stories? Work with PAB to ensure a mechanism is established and maintained.

Staff

☐ Does the Ministry have a mechanism to track staff absenteeism? Work with Public Service Agency to ensure accurate and current documentation of staff illnesses.

☐ Has staff emergency contact and home information been updated? Ensure it is accurate and preferred methods of contact have been identified by staff.

☐ Are appropriate preventative measures in place (i.e. sanitizers, enhanced cleaning practices)?

School Districts

☐ Have school districts activated their pandemic plans?
Stage 2: Single or multiple school closures in BC

Communications

☐ Have communications outlining why school(s) have been closed been sent to schools? Parents? Students? Employees? Work with MHLS, PHO and School District to communicate rationale behind school closure. Ensure consistent use of language.

☐ Has PAB prepared media responses/releases? Ensure responses use language consistent with communications being sent out by Ministry.

☐ Has information been sent to schools that haven’t closed but are in the same school district? Work with PHO, MHO, MHLS and School districts to provide consistent and accurate messaging to schools within area where school has been closed – reiterate why they are not closing.

☐ Should schools be recommending other social distancing methods? Check with PHO, MHO and MHLS for messaging to provide schools to send out to students regarding social distancing recommendations, if appropriate.

Staff

☐ Are staff unable to come to work? Initiate work policies specific to a pandemic – communicate the expectations, options and policy with all staff.

School Districts

☐ Will schools be closed for a prolonged period of time? If appropriate, work with and support school districts to implement their continuity of instruction plans.

Planning

☐ Is virulence increasing? Check in with public health officials and PHO to determine if changes need to be made to protocols to address indications that there is increasing influenza severity.
**Stage 3: Regional or province-wide school closures in BC**

*Communications*

☐ Are public health officials now recommending social distancing? If so, work with public health officials and PAB staff to provide messaging to school districts to be sent out to schools, parents, students

*Staff*

☐ Have staff been re-allocated to mission critical work?

☐ Do staff, and their families, have access to psychological services? Ensure staff is aware of the supports available.

*Planning*

☐ Will school closures impact the current provincial exam schedule? Should the schedule be adapted to accommodate the current situation? Identify options for students to complete their provincial exams.

☐ Should/could the school year be modified to offset the prolonged school closure?
APPENDIX B

PANDEMIC PLANNING GUIDELINES FOR SCHOOL DISTRICTS

OVERVIEW

The Pandemic Planning Guidelines for School Districts are intended to work in tandem with the Ministry of Education Pandemic Response Framework and the School Closure Guidelines developed by the Ministry of Healthy Living and Sport and the Office of the Provincial Health Officer.

The intended audience for the School Closure Guidelines are public health officials who work with the education system in BC. School districts should also be aware of the national guidelines for schools released by the Public Health Agency of Canada (http://www.phac-aspc.gc.ca/alerte/h1n1/interim-provisoires0819-eng.php).

The primary audience for the Framework is the Ministry of Education and the target audience for the Pandemic Planning Guidelines for School Districts is all school districts and independent school authorities in BC.

PUBLIC HEALTH

Although the decision to close a school for public health reasons lies with public health officials, it is important for school districts to be aware of communication protocols and their roles in closing a school.

It is recommended that school district staff establish strong working relationships with their local health authority and medical health officer and work collaboratively on the development of their district pandemic plans.

REQUIREMENT

Boards of education are required, through Worksafe BC, to have exposure control plans when dealing with a pandemic or potential pandemic. The requirements for an exposure control plan are found in section 5.54 of the Occupational Health and Safety Regulation (Appendix C).

It is strongly recommended that school districts consider the circumstances of a pandemic in their exposure control planning.
**SUGGESTED COMPONENTS FOR DISTRICT PANDEMIC PLANS**

Recommended components to be included in school district pandemic plans:

<table>
<thead>
<tr>
<th>Component</th>
<th>Suggested considerations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emergency Response Team</td>
<td>Identify a district emergency response team with clear roles and responsibilities articulated, including a district contact person to work with schools during the event.</td>
</tr>
<tr>
<td>Communications Plan</td>
<td>Develop a communications plan to ensure appropriate and timely communication to students, staff, parents and all members of the school community. This should include a communications tree to be used during the event, as necessary.</td>
</tr>
<tr>
<td>Continuity of Instruction</td>
<td>Establish alternative learning strategies to ensure continuity of instruction in the event of prolonged school closures.</td>
</tr>
<tr>
<td>Transportation</td>
<td>Plan for a disruption in the school transportation system (i.e. bus system) by establishing alternative transportation strategies.</td>
</tr>
<tr>
<td>Janitorial Services</td>
<td>Identify and develop alternative cleaning/janitorial strategies and protocols, and plan for disruptions in janitorial services.</td>
</tr>
<tr>
<td>Employee Work Policies</td>
<td>Develop employee work policies that apply during a pandemic.</td>
</tr>
<tr>
<td>Separation, Supervision and Transportation of Sick Students</td>
<td>Develop a plan to address the separation, supervision and transportation of students who fall ill while at school.</td>
</tr>
<tr>
<td>Reporting Elevated Absenteeism and Outbreaks</td>
<td>Work with the local health authority to develop a plan for monitoring and reporting elevated absenteeism and outbreaks in schools</td>
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<tr>
<td>Other unique considerations</td>
<td>Strategies to address other unique circumstances that may be of relevance such as:</td>
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<td></td>
<td>· Students with special needs</td>
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<td></td>
<td>· Students with underlying medical issues and compromised immune systems</td>
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<td>· School meal programs</td>
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<td></td>
<td>· Alternative use of schools during a pandemic</td>
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<td></td>
<td>· Access to psychological services</td>
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<td>· Onsite daycares, StrongStart centres</td>
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<td>· Other activities that may take place in the school building, within or outside school hours</td>
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<td></td>
<td>· Confidentiality of student health information and how this confidentiality is maintained while ensuring that the response to potential risk is adequate.</td>
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<td></td>
<td>· Planning for school based vaccination programs should schools be proposed as settings for vaccinations.</td>
</tr>
<tr>
<td>Recovery Plan</td>
<td>Develop a return to normal plan.</td>
</tr>
</tbody>
</table>
**Emergency Response Team**

*It is recommended that all districts establish an emergency response team with clear roles and responsibilities.* Important considerations include:

- Who should be on the team?
- Who should lead the team?
- Who should be the main contact for the Ministry? For the schools?
- Do all team members have clearly defined roles and responsibilities?
- Are there alternates for the team in case the original members fall ill during the pandemic or emergency? Are the alternates trained?
- Do all schools have teams in place?
- Has each school designated a contact to work with the district lead?
- Has the team been trained in emergency management?

**Communications Plan**

A clear communications plan is a **key component** in successful pandemic planning. *It is strongly recommended that district staff develop a comprehensive and clear communications plan in collaboration with their local health authority and local schools.*

School districts should work with regional health authority staff in the development of their pandemic communications plan. The relationship between school district staff and public health officials is critical. Having an established relationship and clear roles and responsibilities for both sectors will help ensure an effective and efficient response in the event of a pandemic and in particular, a school closure. School district staff are encouraged to contact their local Medical Health Officer or designated pandemic planning contact for assistance with pandemic planning.

School districts should consider the following in the development of their communication plans:

- Has health authority staff been consulted in the district’s pandemic planning?
- Does the district have a communications plan for emergencies? Can it be applied/adapted to a pandemic?
- Who will be the district spokesperson for media?
- Identify the district communications contact and ensure they work with the Ministry communications lead during the event.
- In the event of school closures or other events media may be interested in, who will write news releases? Work with Ministry of Education for draft messages and for other support.
- Identify ways in which the district will communicate out to parents if schools close (i.e. web update, letter home, phone/email if closure happens after school hours)
- What communication needs to go to teachers, unions? Who does it and how is it done?
- Plan for frequently asked questions; try to be prepared from a communications perspective for potential issues that may arise. Have questions and answers prepared, key messages
drafted and approved. Work with Ministry of Education and public health to ensure accurate and consistent language.

- How will the district ensure consistent, accurate and up to date information reaches all stakeholders: schools, teachers, parents, students? Is there a mechanism in place? What strategies will be used (contact person, 1-800 line, website with updates, radio)?
- What strategies will the district have in place to ensure parents/teachers/students remain calm and informed during the pandemic?
- Does the district have communications materials (letter templates, posters, fact sheets) drafted? Does the Ministry of Education and/or Ministry of Healthy Living and Sport have materials developed already?
- Have any of the communications materials been translated? Are they age appropriate?
- Does the district have a communications tree?
- Is all students’ emergency contact information current?

**Continuity of Instruction**

Schools and districts need to plan for the continuation of learning if schools are closed for a prolonged period of time. School districts need to consider the development of plans and scenarios and identify ways to provide curriculum and instruction using alternate delivery methods and e-learning methodologies.

In a pandemic, the primary role of the Ministry of Education is to offer supportive services to school districts in the delivery of educational services to students. The Ministry is able to help identify activities which may offer the greatest leverage to enable learning to continue during a period of school closure. The Ministry will act as a central clearing house of resources and resource providers, a registry of key district personnel charged with the development of each district’s response as well as facilitating relationships between key district leads responsible for continuity of instruction strategies.

*It is recommended that each school district develop plans to enable learning to continue if school campuses are closed as a result of a response to a pandemic. It is recommended that a communication lead be identified in each district so that information and resources are able to flow to and from the district and other partner groups.* School district contacts are able to provide local consistency and credibly respond to emerging local developments.

Many districts have distributed learning schools within their boundaries or have working relationships with regional distributed learning schools. The resources, staff and methodologies of these facilities may be employed to enhance the activities of neighbourhood schools. As well, if school districts plan to have current staff members act as online educators in the event of an outbreak, these educators would need to be trained to teach in an online environment as well as have access to the necessary technologies.
Some considerations for school districts with respect to continuity of instruction strategies:

- Has the district identified a contact person to work with Ministry staff on continuity of instruction planning?
- Has the district initiated discussions with distributed learning schools?
- Have teachers/principals been trained to teach in an online environment?
- Does the district have the necessary technologies to implement their continuity of instruction strategies?
- Has the district or schools prepared any resources to be used during a pandemic (i.e. website that has been developed and can be activated during a pandemic)?
- Does the district have web conferencing or similar technology that would enable teachers and administrators to continue teaching and communicating with their student and parent communities? If not, are there local, regional or provincial licenses that could be made available?

**Transportation**

During a pandemic there may be disruptions to a school’s transportation system. School districts and schools will need to consider:

- Alternative strategies to ensure continuity of all students’ educational programs. In some districts this may be alternative transportation methods (i.e. having students actively commute to school, public transportation, relying on parents to get children to school) while in other more rural districts, it may be initiating the district’s continuity of instruction strategy in the absence of a school closure.
- Should additional bus drivers be trained? Are there parent volunteers that are qualified to drive school buses? If so, what measures need to be in place? (i.e. criminal record checks)
- Could a car pooling system be organized?

**Janitorial Services**

Ensuring schools are clean and sanitary is important. School districts and schools should be aware of whether enhanced cleaning practices are being recommended. *It is recommended that school districts work with local health authorities to determine what mechanisms need to be established to ensure appropriate sanitation levels are achieved.*

Janitorial staff may become ill and absent from work during a pandemic so it is important for school districts to establish alternative strategies to ensure adequate levels of sanitation services are available. *It is recommended that all school districts have procedures to address cleanliness in schools and strategies to address the continuity of adequate cleaning services in the event of janitorial staff absenteeism.*
Considerations for school district planning for continuity of janitorial services:

- Is public health recommending special cleaning items and procedures for adequate sanitation? If so, has janitorial staff been informed? What, if any, special cleaning materials will need to be purchased?
- Has the district contacted the local health authority to determine what cleaning mechanisms need to be put in place?
- What strategies are needed to ensure janitorial services can be maintained during a pandemic? Training additional staff to ensure someone is available to clean schools if janitorial staff are absent from work? If so, what measures need to be in place?

Employee work policies

School districts will have to consider and plan for employee absences during a pandemic due to factors such as personal or family illness, social distancing recommendations from public health, school and/or business closures and public transportation disruptions. Policies and procedures need to be established for staff compensation and sick-leave absences unique to a pandemic. All policies should be communicated to staff to ensure employees are aware of the conditions of their absences.

In the development of these policies and procedures, it is recommended that district staff work closely with their regional contact at the British Columbia Public School Employers Association (BCPSEA).

It is also important to consider employees’ confidentiality if they do fall ill during a pandemic. The Ministry of Education has developed a protocol outlining the criteria for disclosing employees’ medical information (Appendix D). It is recommended that school districts consider the development of a similar protocol for school district staff.

Separation, Supervision and Transportation of Sick Students

It is recommended that school districts develop a plan to address the separation, supervision and transportation of students who fall ill while at school. The following items should be considered as a part of the district’s planning:

- Where should sick students be contained to reduce risk of spread to other students?
- How will these students be transported home from school?
- Who will supervise these students?
- How will staff who are responsible for the supervision of sick students be protected?
- How will staff ensure the student is adequately cared for and comfortable while ill at school?
- How will staff ensure that sick students are treated with respect by both other students and staff members?
- How will parents be made aware of these procedures and protocols?
How will staff ensure parents of other students remain calm if a student at the child’s school becomes ill?

**Reporting Elevated Absenteeism and Outbreaks**

It is recommended that school districts work with their local health authority to develop a plan for monitoring and reporting elevated absenteeism and outbreaks in schools during a pandemic.

In planning, school districts may want to consider:

- Are there existing communication channels between the health authority and the district? School? Ensure contacts are established in the health authority to help with planning.
- Is there an existing protocol/procedure for reporting out to health authorities on absenteeism? Does it occur at the school level? District level? Ensure roles and responsibilities are clearly understood.

**Other considerations**

As all school districts are different and have different needs and circumstances to consider in the event of a pandemic, it is important for school districts to incorporate additional strategies in their pandemic plans as required. Examples of other considerations include:

- The unique requirements of students/staff with special needs and underlying medical conditions. Some of these individuals may be immune-compromised and at a greater risk of contracting an illness. Some may also be at a greater risk of complications due to their underlying medical condition.
- Students who rely on school food service for daily meals and the impact a school closure may have on their ability to get adequate levels of nutritious foods.
- Those students/families who may have language barriers resulting in difficulty understanding pandemic-related communication materials. It is also important to consider cultural differences in the reaction to a pandemic and the different approaches families may take when dealing with the realities of such circumstances.
- The availability of psychological and social services. It is important for district and school staff to know what resources are available to help them cope with the effects of a pandemic. School districts may want to consider enhanced access to psychological services for students and staff in their recovery plans.
- Using school facilities for additional purposes. In their plans, school districts need to consider other possible uses for their school facilities. It is possible for schools to be used for alternative purposes even in the event of a school closure. If a school is closed to students, school districts may continue to allow teachers and administrators to use the facilities to support strategies for continuity of instruction.
- School districts that have schools with onsite day cares and/or StrongStart centres. In planning, it is important to consider the impact of a pandemic, including school closures, on the operations of these facilities.
• Other activities that may take place on the school grounds, within or outside school hours.
• Confidentiality of patient health information and how this confidentiality is maintained while ensuring that the response to potential risk is adequate.
• Planning for school based vaccination programs should schools be proposed as settings for vaccinations.

**Recovery plans**

In the post-pandemic period, it is important for school districts to have clear recovery/return to normal plans. Adequate planning will ensure that school district offices and all schools will return to normal in a timely and efficient manner. At all levels, in particular at the school level, it is especially important to consider the development of procedures and protocols to ensure students and staff who were ill during the pandemic return to a respectful and safe environment. Policies, procedures and protocols to minimize harassment and bullying will be beneficial.

It is also important to debrief and reflect during this period; to assess what worked well and what lessons were learned that could inform future pandemic planning. Adequate levels of communication will continue to be very important as communities strive to return to pre-pandemic conditions.
APPENDIX C

Section 5.54 of the Occupational Health and Safety Regulation

5.54 Exposure control plan

(1) An exposure control plan must be implemented when

(a) exposure monitoring under section 5.53(3) indicates that a worker is or may be exposed to an air contaminant in excess of 50% of its exposure limit,
(b) measurement is not possible at 50% of the applicable exposure limit, or
(c) otherwise required by this Regulation.

(2) The exposure control plan must incorporate the following elements:

(a) a statement of purpose and responsibilities;
(b) risk identification, assessment and control;
(c) education and training;
(d) written work procedures, when required;
(e) hygiene facilities and decontamination procedures, when required;
(f) health monitoring, when required;
(g) documentation, when required.

(3) The plan must be reviewed at least annually and updated as necessary by the employer, in consultation with the joint committee or the worker health and safety representative, as applicable.
APPENDIX D

Ministry of Education protocol for disclosure of personal medical information

In the event that a manager, supervisor or executive becomes aware that an employee has been diagnosed with H1N1 Influenza, they must obtain the Deputy Minister’s approval to disclose any personal information to another person without the express consent of the employee.

Prior to exercising their discretion under Sections 25 and 33.1 (m) of the FOIPPA, the Deputy Minister will:

   (a) ensure the facts of the individual circumstance are accurate,
   (b) consult with the Ministry FOI director and the Head of the Public Service Agency and,
   (c) consult with the Provincial Health Officer if there is any doubt whether the circumstances of the situation indicate a need to protect the public interest.

In situations where information is released regarding the diagnosis of a case of H1N1 influenza, the Deputy Minister will work with public health officials to ensure effective hygiene practices are put in place to prevent the spread of the virus.