



St. Paul's School Employee-Student Interactions Policy

Assembly Bill 500 (AB500), effective January 1, 2018, adds section 44050 of the California Education Code, which requires schools to provide this section on employee interactions with pupils in its code of conduct and to parents and guardians of enrolled students on the School's website. The policy is also included in the School's Employee Handbook.

Employee / Student Boundaries Policy

The School encourages friendly, supportive relationships between community members, including employees and students. Interactions between employees and students must always be professional and appropriate, whether on campus or away from campus, and employees are responsible for keeping them that way. For purposes of this policy the term "employee" also includes volunteers. For those employees whose children attend the School, this policy does not apply to employees' interactions with their own children while off campus or outside of School sponsored activities.

This policy is not intended to restrict warm and supportive relationships between employees and students, which are appropriate in an educational environment. Positive and supportive relationships may include strong appreciation, expressions of care, and appropriate one-on-one support with the knowledge of the School. This policy is intended to prevent employee/student interactions that could lead to, or may be perceived as, as flirtatious, sexually suggestive, unfair, or otherwise inappropriate.

Employees must take care to avoid any conduct that is not a professional or appropriate employee/student interaction or could be perceived as such.

Below are the rules employees must follow. These rules are not an exhaustive list of prohibited employee conduct, but rather a general framework for describing inappropriate employee-student interaction.

1. Appropriate Interactions

- In general, any interaction with a student should be something an employee would feel comfortable saying or doing in front of that student's parents and the employee's supervisor.
- Employees must avoid creating excessive emotional attachments beyond the healthy employee/student relationship.
- Employees must use sound judgment as to how much information they share with students about their own personal life, and may not share information for their own personal emotional gratification.
- Employees should consult their supervisor without delay if a student is or

seems to be pushing the employee's personal boundaries, attempting to establish an inappropriate relationship, or it appears another type of problem is beginning to emerge.

- Employees must avoid any sexual or romantic interactions or relationships with students or the appearance of one. Dating or one-on-one social interaction unrelated to school, between an employee and student, are not allowed.
- Employees are expected to treat students and families fairly, and not to show favoritism or any special treatment.

2. Communication

- Employee communications with students (e.g., notes, email, or other electronic exchanges, or phone calls) must be professional and appropriate in all respects. This means that employee communications must only contain appropriate, school-related content and must take place at times of the day that are appropriate under the circumstances. This also means that employee communications with students must take place using school-owned technology unless prior authorization has been obtained from the School and parents.
- Employees may not make jokes, use slang, or suggestive comments or innuendo of a sexual or discriminatory nature in communicating with students (or at any other time at work).

3. Meetings with Students

- When meeting with a student one-on-one, employees must balance potential privacy concerns with appropriate professionalism and should avoid meeting in locations that are closed off or not visible or accessible to others.
- Employees are prohibited from meeting with students off campus unless it is a pre-approved School activity with other individuals present or if employees are meeting with a group of students to plan school events or gatherings, in which case the employee must first obtain the permission of the School Administration and the students' parents or guardians.
- SPS understands that for those employees whose children attend the School, they and other parents may wish to get their kids together for playdates or other activities that may include school students being in the employee's home. In these cases, where a student is at an employee's home for a playdate or other activity with the employee's child, that is not part of or related to the employee's job duties, and is not within the scope and course of the employee's employment at SPS.

4. Driving Students

- Employees are prohibited from giving students rides to and from SPS, unless the employee is also a parent of a student attending SPS, and is carpooling with other parents. When a SPS employee who is a parent wishes to drive

other students as part of a carpool, that employee must first notify the Head of School, and the Head of School must receive written permission from the parents of the students in the carpool, before that employee is permitted to drive other students to and from SPS. Employees acknowledge that driving other students as part of a carpool for their child is not part of or related to their job duties and is outside of the course and scope of the employee's employment at SPS.

5. **Mandatory Reporting**

- If a student shares confidential information that could pose a threat to the student or others, employees have an obligation to notify the Head of School and/or make a report of suspected child abuse or neglect in keeping with the School's child abuse reporting policy and mandated reporting laws.

6. **Drugs and Alcohol**

- Employees may not be under the influence of alcohol or drugs or consume alcohol or drugs at any School-sponsored activities where students are present.
- Employees are also prohibited from discussing any personal alcohol or drug use, whether past or current, with students.

Employees have ultimate responsibility for ensuring they do not break the rules established in this policy, or create the fact or appearance of an inappropriate relationship. Disagreeing with the wording or intent of the established rules does not exempt employees from strictly complying with this policy.

If an employee finds themselves in a difficult situation related to boundaries or has questions related to these protocols and requirements, they should consult the Head of School. If any employee becomes aware of another employee failing to adhere to this policy, that employee must immediately report the matter to the Head of School.

Child Abuse Reporting Policy and Procedure

The Child Abuse and Neglect Reporting Act (the "Act") (Cal. Pen. Code §§ 11164 – 11174.3) requires certain professionals and lay persons who have a special working relationship with children to report suspected abuse to the proper authorities. All employees at SPS must sign an acknowledgment that they have read and understood Penal Code Section 11166 regarding the reporting of suspected child abuse. In order to clarify the reporting obligation, attached to the acknowledgment and statement of Section 11166 is a list of signs, symptoms, or conditions that might indicate abuse. An additional page includes all the telephone numbers for local child protective services, sheriff departments, and other support services.

Definitions

"Designated Agencies" means any police department or sheriff's department (not including a school district police or security department), the county probation department (if designated by the county to receive mandated reports), or the county welfare department (Cal. Pen. Code §11165.9).

“Mandated reporters” include, but are not limited to, the following:

- A teacher.
- An instructional aide.
- A teacher’s aide or teacher’s assistant employed by a public or private school.
- An administrative officer or supervisor of child welfare and attendance, or a certificated pupil personnel employee of a public or private school.
- An administrator of a public or private day camp.
- An administrator or employee of a public or private youth center, youth recreation program, or youth organization.
- An administrator or employee of a public or private organization whose duties require direct contact and supervision of children.
- A clergy member, as specified in subdivision (d) of Section 11166. As used in this article, “clergy member” means a priest, minister, rabbi, religious practitioner, or similar functionary of a church, temple, or recognized denomination or organization.
- A licensee, an administrator, or an employee of a licensed community care or child day care facility.
- An athletic coach, athletic administrator, or athletic director employed by any public or private school that provides any combination of instruction for kindergarten, or grades 1 to 12, inclusive.
- A person who is an administrator or presenter of, or a counselor in, a child abuse prevention program in a public or private school.

“Reasonable Suspicion” means a suspicion of child abuse or neglect where “it is objectively reasonable for a person to entertain such a suspicion, based upon facts that could cause a reasonable person in a like position, drawing, when appropriate on his or her training and experience, to suspect child abuse or neglect.” (Penal Code § 11166(a)(1)). Reasonable suspicion does not require certainty. In other words, if an employee reasonably suspects child abuse or neglect, he or she must report.

Child abuse or neglect includes any of the following:

- Physical injury or death – inflicted by other than accidental means on a child (Pen. Code § 11165.6).
- Sexual abuse – sexual assault and sexual exploitation, including child pornography and child prostitution (Pen. Code § 11165.1).
- Severe or general neglect – must be reported if the perpetrator is a person responsible for the child’s welfare. It includes acts or omissions harming or threatening to harm the child’s health or welfare (Pen. Code § 11165.2).
- Unlawful corporal punishment or injury – means willfully inflicting any cruel or inhuman corporal punishment or injury resulting in a traumatic condition. (Pen. Code § 11165.4).
- Willful harming or injuring of a child, or the endangering of the person or health of a child – which includes willfully causing or permitting any child to suffer, or inflict thereon, unjustifiable physical pain or mental suffering, or willfully causing or permitting the person or health of the child to be endangered. (Pen. Code § 11165.3).

Examples of sexual abuse and sexual activity, which must be reported, include but are not limited to:

- Rape,
- Statutory rape where one party is under the age of 16 and the other is over age 21,
- Group rape,
- Incest,
- Sodomy,
- Lewd act on a child,
- Penetration by a foreign object,
- Oral copulation,
- Child molestation.

Examples of sexual exploitation which must be reported include but are not limited to:

- Preparing, selling or distributing matter depicting a minor engaged in obscene acts, including via the internet or electronic device,
- Coercing a child to engage in prostitution or coercing parental consent for a child to engage in prostitution,
- Depicting a child in or creating, developing or trading photos of minors engaged in obscene sexual conduct.

Examples of neglect, which must be reported, include, but are not limited to, malnutrition, lack of physical hygiene, inadequate clothing, or lack of medical care under circumstances indicating harm or threatened harm to the child's health or welfare.

Responsibility for Reporting Child Abuse

Child abuse or neglect must be reported whenever a mandated reporter, in his or her professional capacity or within the scope of his or her employment, has knowledge of or observes a child whom the mandated reporter knows or reasonably suspects has been the victim of child abuse or neglect. (Pen. Code § 11166(a)). Abuse and neglect do not only occur outside school. Any abuse by a School employee, independent contractor, volunteer, or student violates School rules and must be reported as well.

The mandated reporter has individual responsibility to report when he/she receives reliable information or has the initial contact with the child when a concern arises. If the individual confers with a superior and a decision is made that the superior file the report, one report is sufficient. However if the superior disagrees, the individual with the original suspicion must report. If the mandated reporter "suspects" child abuse, he/she must make a report without delay.

A mandated reporter who has knowledge of or who reasonably suspects that a child is suffering serious emotional damage or is at a substantial risk of suffering serious emotional damage, evidenced by states of being or behavior, including, but not limited to severe anxiety, depression, withdrawal, or untoward aggressive behavior toward self or others, may make a report to a designated agency. (Pen. Code § 11166.05).

If a child reports acts of abuse to a School employee, it is not the employee's responsibility to determine whether the claim is true. It must be reported as instructed in this policy and as required by law. As a matter of School policy, the School also requires employees to inform his or her supervisor or another member of the School

Administration if the employee becomes aware of abuse, including abuse of a student by any employee or independent contractor, volunteer, or student of the School. An employee does not need to inform his or her supervisor or the member of the Administration that you have made a mandated report about the abuse.

Procedure

The mandated reporter reporting the abuse is responsible for filing the necessary reports.

A mandated reporter must make an initial report by telephone to a designated agency immediately (or as soon as practically possible). The mandated reporter may call the Child Abuse Hotline at 1-800-540-4000 to report the incident. Be ready to provide the following information:

- What type of abuse has occurred,
- Who or what caused the abuse,
- Whether the child is still in danger or is in need of medical care.

Within 36 hours of receiving the information regarding the incident, the mandated reporter must prepare a written report on a Suspected Child Abuse Report, Department of Justice form SS 8572 and send it by fax or electronic transmission.

If there is a child endangerment situation, the mandated reporter should consider calling the local police and doing so under appropriate circumstances.

Mandated reporters are not legally required to notify the parent or guardian of a suspected victim that they are making a report, and in some cases should not do so. Because reporters are not investigators, they lack the information to determine the potential involvement of the parent/guardian in the suspected abuse or neglect.

Mandated reporters are required to give their names to the reporting agency. Non-mandated reporters may report anonymously. Child protective agencies are required to keep the mandated reporter's name confidential, unless the mandated reporter consents to disclosure or a court orders the information be disclosed, or as otherwise required or allowed by law.

Mandated reporters have civil and criminal immunity when making a report. (Pen. Code §11172). No mandated reporter will be disciplined, dismissed, retaliated against, discriminated against or harassed for making an authorized mandated report of reasonably suspected child abuse or neglect.

Mandated reporters may consult the Head of School or Director of Business Operations if they question whether the conditions they are observing raise a reasonable suspicion of child abuse or neglect, but the reporting obligation belongs to the individual who discovers a reasonable suspicion of child abuse or neglect. A reasonable suspicion of child abuse or neglect must still be reported by telephone as quickly as possible.

Mental or emotional abuse that does not rise to the level of unjustifiable mental suffering may, rather than must, be reported.

Standards of Conduct

To facilitate an appropriate and positive work environment, SPS expects employees to observe certain standards of job performance and follow rules of conduct. The rules of conduct set forth below and elsewhere in this Employee Handbook are intended to provide employees with examples of prohibited conduct, but is not meant to be comprehensive of all conduct in violation of SPS policy. Misconduct not specifically listed below can result in disciplinary action. Unless otherwise provided in an individual written employment agreement signed by the Head of School and the individual employee and approved by the Board of Trustees, at all times, employment remains at-will, meaning the employment relationship may be terminated with or without notice and with or without cause by either the employee or SPS.

Examples of inappropriate conduct include, but are not limited to:

- Violation of the School's Policy Against Harassment, Discrimination and Retaliation;
- Violation of the School's Anti-Bullying Policy;
- Violation of the School's Employee/Student Boundaries Policy;
- Use of corporal punishment on students, including but not limited to striking or hitting a student by hand or another instrument (e.g. paddle, rod, yardstick, etc.), hair-pulling, hand-slapping, face-slapping, pushing, punching, spanking, kicking or the like;
- Providing false information or omitting material facts on any documents in connection with employment including, but not limited to job applications, resumes, medical, payroll, financial or time keeping records;
- Failure to meet or maintain licensing requirements and standards as set forth by the appropriate licensing departments;
- Violation of the Policy Against Workplace Violence, including engaging in violent, abusive or disorderly conduct, or possession, use, sale or purchase of weapons on work property, during work hours, or while performing work-related functions;
- Violation of the Drug and Alcohol Free Workplace Policy, including possession, use, sale or purchase of illegal drugs or controlled substances on work property, during working hours, or while performing work-related functions;
- Poor performance, unsatisfactory quality or quantity of work;
- Unauthorized use, theft or damage of any SPS property or the property of any employee or students;
- Removing or borrowing SPS property without prior authorization;
- Engaging in criminal conduct;
- Insubordination, including but not limited to failure or refusal to obey School policy and the reasonable policy directions or instruction of the Head of School, any supervisor, or administrative employee I;

- Using profane, abusive, threatening or disrespectful language at any time during working hours or while on premises owned or occupied by SPS;
- Violation of the Acceptable Use Policy regarding use of the School's computers, e-mail, Internet, phones and voicemail systems, or of the School's Social Media Policy;
- Failing to notify an employee's supervisor if an employee will be late or unable to report for work on a scheduled workday;
- Failing to obtain permission to leave work for any reason during normal working hours;
- Failing to observe work schedules, including rest and lunch periods;
- Abusing sick leave, including failing to provide a doctor's note when requested or required to do so;
- Violating any safety, health, or security policy, rule, or procedure;
- Committing a fraudulent act or a breach of trust, including but not limited to breaches of ethical conduct or unauthorized use or disclosure of confidential or proprietary information; and/or
- Violating any other School policy, rule, or conduct expectation.

Employees should always observe the following rules with respect to their dealings with all SPS students and their families:

- No child will be left alone or unsupervised while under SPS's care;
- Treat students and families in a cordial, friendly and respectful manner;
- Respond promptly (for most items, within 24 hours) to parent requests and inquiries;
- Be punctual and keep all commitments made to parents;
- Maintain a professional relationship at all times and maintain appropriate boundaries with students and parents; and
- Never exploit any student or parent, or student or parent relationship.

Communications Regarding Students

Employees should communicate regularly with parents about student progress, (including missing or neglected work), concerns, and commendations via email, phone calls or by meeting in person. Communications regarding student progress, concerns, and commendations should remain confidential and should not be discussed around other parents or students. Employees should not discuss student information in passing with other parents or students and should not reference another student's name when referring to a similar situation.

Employees are expected to communicate regularly with Division Leads, the Director of Teaching and Learning, and Head of School about student concerns and successes.

Discipline Policy and Practices for Students

St. Paul's School strives for a school community where everyone is safe, respectful, and responsible for their personal behavior. Our goal is to provide each student with the support they need to make the learning environment positive for everyone. It is normal and natural for children to test limits. It is also important that students learn the consequences of their behavior.

Teachers should practice positive and progressive discipline with students. Teachers are required to adhere to the following discipline policy and practices:

Do....	Do NOT....
<ul style="list-style-type: none">• Use positive guidance with the students to help them learn appropriate behaviors.	<ul style="list-style-type: none">• Use the following measures to resolve conflicts or to discipline students:<ul style="list-style-type: none">○ Physical/corporal punishment;
<ul style="list-style-type: none">• Set clear, consistent and developmentally appropriate limits for the students.• Provide verbal warnings, alternative choices, redirection, positive attention and modeling of appropriate social skills.	<ul style="list-style-type: none">○ Verbal, emotional, or physical abuse, humiliation, or threats; or○ Discuss a student's behavior or attitude in front of their peers.

Procedure for Addressing Students with Behavior Issues

A teacher should go through the initial steps of disciplining a student, whether it be a verbal warning, time away from recess, or detention. If a student continues to behave inappropriately after repeated guidance from teachers, the teacher must consult with the Head of School regarding the ongoing behavioral problems. A conference with the student may be arranged, and a parent-teacher conference may also be requested to discuss and develop possible plans to resolve the problem.

A student may be "in-house suspended" for a half or whole day, depending on the seriousness of the problem. Teachers should bring the student's school work to the Office. A behavioral contract may need to be established to help the teacher and student modify attitude or behavioral problems. If an employee sends a student to the Office, the employee is required to email the Head of School's Administrative Assistant so that appropriate action may be taken.

If a student behaves violently, is a danger to himself or herself and others, an employee must notify the Director of Business Operations and/or the Head of School immediately. Employees are required to document any incidents or progress concerning a student's behavior (e.g., recurring patterns of serious or inappropriate behaviors, etc.). When applicable, a copy of the incident must be given and signed by the parent when the student is picked up from the School.

Acceptable Use Policy Regarding SPS's Electronic Communications

Resources: Prohibited Use

Prohibited use of the School's Electronic Communications Resources includes, but is not limited to:

- a. Violating any other School policy or rule, including the Internet, Social Media, and Electronic Communications Policy.
- b. Engaging in unlawful conduct.
- c. Violating School policy against prohibited harassment and discrimination, including by exposing others to material which could create an intimidating, offensive, or hostile work environment on the basis of race, religion, national origin, citizenship, ancestry, marital status, gender, disability, age, veteran's status, sexual orientation, or other status protected by law.
- d. Intentionally misrepresenting one's identity.
- e. Communicating confidential School information to unauthorized individuals within or outside of the School.
- f. Attempting to access unauthorized data or break into any system of the School or outside system.
- g. Engaging in theft or the unauthorized copying of electronic files or data.
- h. Engaging in commercial activity or activity for financial gain, not under the auspices of the School.
- i. Engaging in recreational use of the School's Electronic Communications Resources that the Head of School deems to interfere with the employee or other users to conduct school work or the Electronic Communications Resources. This includes but is not limited to downloading or uploading software, games, or shareware. Employees are also prohibited from downloading and using instant messenger (IM) programs.
- j. Establishing passwords for protected devices, files, or other data without registering the confidential password with the Facilities Coordinator.
- k. Performing acts that are wasteful of computing resources or that unfairly monopolize resources to the exclusion of others; these acts include, but are not limited to sending mass mailings or chain letters and creating extremely burdensome network traffic.
- l. Use of Electronic Communications Resources in violation of any other requirements set forth in this Policy.

No employee may install or use anonymous email transmission programs or encryption of email communications. Employees must not use SMS, MMS or peer to peer (i.e. Messaging through iPhone) or any other texting, picture or video communication with students, including communications that disappear or are believed to disappear after being sent or received. Use of the School's Electronic Communication Resources for participation in "chat rooms," instant messaging, blogs, social networking sites (such as Twitter, Facebook, MySpace, LinkedIn, Snapchat, Instagram, or any other similar sites) on campus using School Electronic Resources is acceptable only during work hours and only for a specific and legitimate work related purposes.

Questions about use of the School's Electronic Communications Resources or issues relating to security should be addressed to the Director of Business Operations.

Prohibited use of the School's Electronic Communications Resources could lead to disciplinary action, up to and including termination.

Internet, Social Media and Electronic Communications Policy

Do Not "Friend" OR Interact with Students Through Social Media Outside the School

School employees, including teachers, shall not communicate or interact with school students via social media or text, other than as authorized and through the official School sites. When external communication with students is necessary, employees are encouraged to use school email or another school-approved third-party application (e.g. Remind 101) and must include The Director of Teaching and Learning in the communication. This restriction applies to former students, until the former student reaches the age of 18.

CLASSROOM POLICIES, GRADING, SAFETY, EVENTS

Safety and Supervision

Injuries and Accidents

If a student is injured on the school grounds, employees have an immediate responsibility to send for help and to stay with the student. Employees should typically not attempt to move the injured student, especially if the student appears to have a back, neck, head or leg injury. A scratch on a hand or arm injury may not be serious enough to warrant not retaining the child at that location. It is important to make note of witnesses that may have seen what happened. When help arrives and the student has been taken to the Office or off campus, an Accident Report must be completed and given to the Head of School. If you are injured while on duty at the school, report the injury to the Head of School immediately and refer to the section on Industrial and Accident Illness Leave.

Child Supervision

Children must be supervised at all times. Children should never be in the classrooms unattended. Students are not to enter classrooms, the Chapel, Library, Kitchen, Computer Lab, or Art Room unless a teacher is present. As a fire safety precaution, teachers should close and lock the door to the classroom when the room is empty.

Teachers should escort students to their next class in an orderly manner (to Music, P.E. and the like). Because other classes are in session, noise needs to be kept at a minimum. Classes should travel in single or double lines.

Should it be necessary for the teacher to leave the classroom while students are present, the teacher is to request a neighboring teacher to watch the students for a brief period. The teacher may also call the office or send a student to the office to request assistance from the office staff.

No student is to be released to any person unless that person is cleared through the

Office staff. Office staff will notify you when you are authorized to release a student.

Student Medications

Unless reasonable accommodations are required regarding a student's medication use, the following procedures must be adhered to before the School can administer medication to students. Generally, all prescribed and non-prescribed medication must be left in the nurse's office, along with instructions on the dosage, the child's name, frequency of administration, name of physician prescribing the medicine and a note authorizing the School nurse and class teacher to administer it.

- Medications (prescription or non-prescription) must be delivered by a parent to the Office in the medication's original labeled container. In the case of prescription medication, the container must be affixed with a pharmacist's label stating the student's name and dosing instructions. Medication brought in other containers, including baggies, will not be accepted. If a student is prescribed medication to take on a daily basis, that student's parents must send in at least a 72 hour supply of the medication. No medication will be given to a student without a completed doctor's note or a note signed by the parent on file at the Office. When medications are to be given for prolonged periods of time, it is the parent's responsibility to maintain an adequate supply of medication and to inform the School of changes in dosage, frequency or administration or discontinuance of medication in writing.
- Students should report to the Office at the designated time for their medication.
- If a student has been prescribed an EpiPen, it should be brought to the Office. The EpiPen will be kept in a marked location in the student's classroom or another convenient location. A School employee or designee will bring the EpiPen to any School-sponsored off campus events that the student attends. Parents may contact the Director of Business Operations if they have any questions about this protocol.