

## The Rosslyn Academy Child Safety Code of Conduct, January 2020

Rosslyn Academy's core vision is to inspire and equip each student to develop their God-given gifts for Christ-like service in the world community. When a child's safety is threatened or there is a probability of harm, a child's learning is significantly impacted and their ability to fully develop their God-given gifts is put at risk.

### Rosslyn Academy's Definition of Abuse

The term child abuse is usually applied when dealing with situations involving dependent and developmentally immature children (or any individual who is a student at Rosslyn Academy) and a person who is 3 or more years older than the child or there is a difference in responsibility, trust, or power. Abuse is enacted upon a person that detrimentally affects their physical, emotional, or sexual well-being and growth, including the failure to supply essentials that contribute to the well-being and development of children. Abuse can take several forms, which are defined as:

**Physical** abuse or harassment is intentional contact with a person that causes physical harm. Such acts may include, but are not limited to: slapping, punching, beating, kicking, biting, shaking, burning, holding underwater, pulling hair, or holding against one's will. Reasonable restraint may be used to ensure the safety of others.

**Emotional** abuse can take the form of, but is not limited to, threats to harm, belittling, screaming, threats, blaming, shaming, sharing inappropriate information through electronic or social media, and sarcasm.

**Sexual** abuse or harassment is visual, auditory, or physical stimuli of a person, with or without consent including fondling, oral, genital, or anal stimulation, intercourse, verbal stimulation, indecent exposure, peeping, allowing a child to witness sexual relations, reading/showing pornographic materials. Sexual abuse is further broken into three categories, they are:

- **Physical touching** : Fondling, sexual touching, masturbation in front of, or to the victim, rubbing, holding, and kissing for the purpose of sexual gratification. Further examples include oral, genital, anal and breast stimulation; penetration by penis, fingers, or any other body part of object, of mouth, anus, or vagina; physical contact with a person's clothed or unclothed genitals, pubic area, buttocks, or, if such person is a female, breast, with the intent to arouse or gratify the sexual desire of either party.
- **Verbal**: Remarks which include sexual threats, innuendoes, comments about a

person's body, solicitation, inappropriate sexual talking, obscene phone calls, or any verbal expression with intent to arouse or stimulate.

- **Visual** : Indecent exposure, showing or taking of suggestive pictures, peeping, leering, or staring. Visual sexual abuse or harassment also includes voyeurism, exhibitionism, showing of pornographic material, of genitals, or of any sexual activity such as masturbation or intercourse.
  
- **Sexual Exploitation** : Allowing, permitting, compelling, encouraging, aiding, or otherwise causing a child to engage in sexual behaviors that are not appropriate. Prostitution, photographed explicit sexual or pornographic activity.

**Neglect** is the failure, refusal or inability to provide care (i.e. instruction, food, clothing, basic medical services and shelter) whether deliberately or from negligence by the parent, guardian, or person exercising temporary/permanent control, withstanding cases of poverty and war, that seriously endanger the well-being of the person.

**Grooming** refers to building a relationship, trust and emotional connection with a child or student so they can manipulate, exploit and abuse them. This may occur online or in person. It may take the form of building a romantic relationship, mentoring relationship, an authority figure, or a dominant and persistent figure. It may look like the individual pretending to be younger, giving advice or showing understanding, buying gifts, giving a student preferred attention, or seeking to take the individual on trips or outings. The individual may also try to isolate the child/student from their friends and family or try to control, frighten, or intimidate the child.

**Bullying & Harassment** (\*see Rosslyn's "Bullying & Harassment Policies" for more information) Bullying is defined as unwanted, aggressive behavior by an adult or child towards another child that involves a real or perceived power imbalance and is repeated or has the potential to be repeated. It may include a wide variety of physical or verbal conduct. Types of bullying may include but are not limited to: verbal, physical, cyber, racial, and emotional bullying. Harassment is repeated subtle or overt action, particularly by a person in a position of trust or authority, which causes the recipient to feel attacked, demeaned, intimidated, and/or manipulated. Sexual harassment consists of unwelcome sexual behavior targeting an individual or individuals and may occur online or offline. Sexual harassment is likely to violate a person's dignity and make him/her feel intimidated, degraded, or humiliated and/or create a hostile, offensive, or sexualized.

**Exploitation**: Exploitation is the action of treating someone unfairly in order to benefit from his/her work. Exploitation is any activity that takes advantage of a child that could harm his/her welfare and development. This includes, but is not limited to, sexual and commercial exploitation.

**Child-to-Child Abuse Cases** : Typically abuse between individuals under the age of 18 is defined as any sexual behavior that occurs without consent or understanding by one party, without equality, or as a result of coercion. However, this also includes any child who is still within the educational system. There is a difference between normal childhood sexual exploration and inappropriate sexual behavior or abuse. The difference has to do with a difference in the level of sexual understanding, coercion, age, differences in responsibility, trust, power, and development. Should both the victim and the alleged offender be under the age of 18, it will typically be considered abuse if there are more than three years difference between the children or there is a difference in responsibility, trust, or power between them. If there is less than three years age difference and there is not a significant difference in responsibility, trust, or power between them, what would normally be defined as abuse will be considered inappropriate behavior, with an action safety plan put in place to address the behaviors of concern and their effects. Because of these and other variables, child-to-child cases will be judged on a case-by-case basis.

**Inappropriate Behavior:** If behavior is identified that raises concerns regarding the treatment of a child, but does not meet Rosslyn's definition of abuse, a conclusion of inappropriate behavior will be reached. This may occur if the staff Code of Conduct has been breached but harm has not occurred, or where harm has been negligible. Inappropriate behaviors may include but are not limited to: verbal aggression, unwanted hugs, teasing, mocking, or inappropriate electronic communication.

**PREVENTATIVE & SAFETY MEASURES** Training, Code of Conduct, Screening and interview questions, background checks

Rosslyn has named a Child Safety Officer (CSO) who oversees all child safety matters and is designated to receive and lead the response to any reports of harm to a child. The CSO will lead the Child Safety Response Team, which is a group of school personnel who sensitively assess and respond to suspicions, disclosures, or reports of harm to a child. Members are committed to knowing and following the school's Child Safety Policy and Procedures and have received Response Team Training from CSPN. The Child Safety Officer is accountable to the Superintendent, who is accountable to the Rosslyn School Board.

In an effort to prevent situations in which a child's safety is compromised, Rosslyn Academy will conduct background checks or require a certificate of good conduct for new employees. Additionally, during the employee application period, Rosslyn will include structured questions on both the application and during the interview procedure and will require employment references. Rosslyn Academy will not employ anyone with a prior conviction for or history of

child sexual abuse or related offenses at any time during his or her adult life.

Rosslyn Academy will require all current staff, staff spouses (who reside on the campus), volunteers, and contracted workers with regular recurring responsibilities on campus will annually receive training related to maintaining child safety and to acknowledge that they have read Rosslyn Academy's child safety Code of Conduct and agree to abide by it. Staff members and on-campus spouses will be required to read and sign the Code of Conduct and Acknowledgement Form before commencing service at Rosslyn Academy and again at the start of every contract.

Rosslyn Academy will require all external service providers (ie. Private Music Lesson Teachers, Occupational Therapists, Speech and Language Therapists, Educational Psychologists):

- a. Complete an External Service Provider Application that includes a declaration of no previous criminal convictions;
- b. Be interviewed by no less than two people (the Head of Department and the Administrator) prior to providing services on campus;
- c. Attend trainings related to maintaining child safety on campus
- d. Acknowledge that they will be expected to work within the normal school hours. Any exception will be made by the Head of Department who will make arrangements for a third-party to provide accountability (a Rosslyn staff member physically present to oversee the activity, cameras, or the activity takes place in a public location).

Rosslyn students will receive age appropriate child safeguarding instruction annually. Rosslyn families will have access to this policy through the school's website.

Supervision of school personnel will be intentional and will take place through both formal and informal visits to classrooms and programs by administrators and department heads.

## **REPORTING SUSPECTED HARM - PROCEDURES**

All personnel or volunteer who 1) has an indication or suspicion of concern regarding child safety, 2) discovers alleged abuse amongst staff and/or students, regardless of where it may have occurred, must contact the Child Safety Officer via a phone call or email and complete a confidential, written report using the Concerns Referral Form which can be found on Rosslyn's website. Even if there is reason to doubt a report, the reporter must immediately communicate the information accurately and completely. There must not be any attempts to handle the situation privately or perform any preliminary interviews/response.

During the reporting process, Rosslyn will provide immediate safety and appropriate care for each person involved. Support will be offered to students, respondents, and reporters during and after the response process.

Upon receipt of the report, the CSO and at least two other members of the Response Team will review all the information and determine next steps according to policy. In most cases, parents or guardians of children harmed or allegedly causing harm are contacted if, and when, it is determined that a child safety response is required, unless to do so would place the child at a greater risk of harm. Parents or Guardians may or may not be notified before their child is interviewed or before outcome decisions are made secondary to the need to gather information in a timely manner. In addition, designated personnel will evaluate whether a report to authorities is required.

The Child Safety Team will use the Concerns Referral Form to gather information to determine if an official response and/or follow-up is needed (this must happen as soon as it is possible, but no later than 48 working hours from learning of the event). The Superintendent or the appropriate school administrator will be notified at the first opportunity. If the Superintendent or a member of his/her family is implicated, the CSO will also notify the Board Chair. Examples of who to report to are included in the Appendix.

## **CHILD PROTECTION RESPONSE**

Rosslyn Academy will comply with the Child Safety and Protection Network recommendations for responses which may include an Initial Assessment, a Child Safety Assessment, and a Misconduct Assessment. The Child Safety Response Team is expected to fully respond to all reports of possible harm in a timely manner with objectivity and fairness. A response will include the following: planning, gathering information, analyzing information, and determining outcome decisions.

Staff, volunteers, students, and family members are expected to fully cooperate in any response. Anyone (staff, parents, or students) who conceals information or knowingly provides false or misleading information will be subject to appropriate disciplinary action up to, and including, dismissal or termination of enrollment.

If after the Initial Assessment, there is no need for further action, the case will be closed and the team may recommend to continue to monitor the situation. Once a decision has been reached, the Child Safety Team will attach a summary statement to the Concerns Report Form outlining the decision and recommendation to open or not to open an official response including outlining

which official response was required: a Child Safety Assessment and/or a Misconduct Assessment. In the case of a report regarding inappropriate sexual behavior from a child, the Child Safety Team will focus on completing a child safety plan for each child involved rather than a misconduct assessment.

Ordinarily, the adult suspected of harm may be put on Administrative Leave or removed from campus, pending the results of a Misconduct Assessment, in order to provide immediate safety measures and decrease future harm or risk of harm. In the event that a student is suspected of causing harm, the student may be removed from classes and activities until the initial assessment is complete in order to decrease potential harm.

Throughout the response, the Response Team will continually evaluate the needs of the individuals involved and consider persons who need to be informed of the process. All information shall be treated as CONFIDENTIAL, based upon a “need to know” principle. Care will be exercised to protect both the student(s) harmed and the individual(s) who is/are alleged to have caused harm by restricting information access to those who need to know. The response team will maintain a neutral stance until the conclusion of the response. The Child Safety Officer will ensure that the gender of both the complainant and the respondent are represented on the committee. Two response team members will always be present during an interview, one acting as interviewer and the other acting as scribe.

If there is need to conduct a Child Safety Assessment and/or Misconduct Assessment, the following will be taken into account:

- Protect the child from further contact with the respondent and consider the need for any protective measures for the reporter.
- Notify both the respondent and the respondent’s spouse.
- Ensure that the respondent will at no time during the review process face the reporter(s).
- Determine whether or not to call upon an outside person or agency to work with the Child Safety Team in the assessment. If a staff member is involved, Rosslyn Academy may request a CSPN trained member from another organization to lead the response in conjunction with two other members of Rosslyn Academy’s Child Safety Team. Some of the other individuals that need to be considered would be:
  - To consult with a CSPN trained member from another organization
  - To consult with local child protection organizations
  - To consult with local counselors with child protection experience
  - Parents/Guardians/Caregivers, Embassy/Consulate, Police, Nurse, Teacher, School Board Chair, Embassy Regional Medical Officer, Sending/Receiving Agency.

If it is determined that the initial concern was reported out of malice and with no substance, the reporter may receive appropriate discipline by Rosslyn administration, and every effort will be made to restore respect for the respondent. If a report or concern is mistaken or inaccurate, but was made in good faith, the person making the report will not be subject to any form of disciplinary action. If it is found that criminal offenses occurred, offenses will be reported to the proper authorities.

## **CLOSING THE RESPONSE**

After an Initial Assessment, Child Safety Assessment, and/or Misconduct Assessment have been completed, a Statement of Findings will be submitted to the Superintendent. Depending upon the results and outcome decisions of the response the following may occur:

- Implementation of Child Safety Plan(s): The CSO will ensure that the safety plan(s) recommended by the Response Team is/are implemented.
- Administrative Action: Administrative action may be recommended depending upon the results of a Misconduct Assessment and/or a Child Safety Assessment.
- Final Communications: All findings will be documented. Documents may include interviews, records checks, initial assessment, response plan, child safety assessment, child safety plan, misconduct assessment, misconduct findings report, organizational improvement plan, implementation and monitoring of safety and action plans, etc. A final Statement of Findings should also be included in response documentation, including the rationale for decisions. Records should document all processes and outcomes. Files will be clearly documented and maintained permanently. Files will be maintained in the Child Safety Office or when concerning a staff member, in a sealed file in their personnel file.
- Organizational Improvement Plan: The Response Team will identify ongoing risks and vulnerabilities for the school, community, and other students. Changes will be recommended to administration regarding organizational improvements. The organizational improvement plan will also include recommendations regarding improving the child safety response process.
- Monitoring of safety and action plans: The Child Safety Officer will regularly monitor any safety or action plans for the recommended time frame, documenting follow up.

In confirmed cases of abuse, outcome decisions will mandate the following:

- In every confirmed case of child abuse committed by a staff member, the Superintendent will terminate the staff member's service with no possibility of reinstatement. The CSO will report these cases, where applicable, to the staff member's sending agency,

certification agency, the local police and social services, and any other appropriate government agency in the staff member's passport country.

- In confirmed cases where a child has been abused by a volunteer or parent of a student, whether the abuse occurred inside or outside Rosslyn's jurisdiction, the offender will be denied further opportunities for volunteer service and may be denied access to the school's facilities. Reporting to authorities will occur as required.
- Confirmed cases of abusive behavior committed by a student will be evaluated on a case-by-case basis, taking into account factors such as age, seriousness of the offense, acknowledgement of responsibility, and effective treatment, and may result in immediate termination of enrollment.
- If Rosslyn becomes aware that abuse occurred by a former Rosslyn staff member or volunteer, and that this individual is currently employed with another organization and has access to children, Rosslyn will normally inform that organization of the confirmed offense(s) and report to authorities as required, while seeking legal counsel.

#### **APPEAL PROCESS:**

In the case where the subject of the misconduct review, would like to appeal the resulting decision from the review. The individual may submit their appeal to the Superintendent and/or the Head of the Board in writing. The Superintendent and/or the Head of the Board will review the decision in light of the report and correspond in writing regarding their decision to the individual. The response to an appeal may include requesting an external audit of the internal review and resulting decisions.

#### **MEMBER CARE PROCESS :**

The Response Team will seek opportunities to provide individual help and care for the child and his/her family, the respondent and his/her family, and other individuals affected during and after a child safety response. Rosslyn will provide support to affected individuals according to the resources available to the school. Member care services will be recommended on a case-by case basis and may include, but are not limited to: medical care, assigned school advocate, counseling, mentoring, chaplaincy support, compassionate leave, and/or additional information and resources.

#### **HISTORICAL REPORTS:**

Rosslyn is committed to taking all reports of harm to children seriously, whether past or present. Because of the importance to the individual, other children, and the organization itself, Rosslyn will respond to reports of abuse, no matter how old. In such historical cases, ie., more than three years after the abuse occurred and where the victim is now an adult, the following factors shall be necessary to initiate a formal response: the willingness of the individual to make a formal report, or an eyewitness account of abuse by a third party. A sexual abuse offender's relationship with Rosslyn should be terminated if the allegations are confirmed, regardless of any statute of limitations.



**MEDIA RELATIONS:**

It is the responsibility of the Superintendent to be the designated spokesperson to speak on behalf of Rosslyn to the media and to the public in relation to a child safety response. All inquiries should be directed to the Superintendent. Comments should not be made by other individuals unless given permission to do so. Public statements must be well prepared and presented under the guidance of legal counsel. At no time should board members or staff engage in denial, minimization, or blame, or admit responsibility which could prejudice the case or cause increased liability to Rosslyn.

## Appendix A: Rosslyn Academy Code of Conduct for Child Safety

### **The Rosslyn Academy Child Safety Code of Conduct, May 2020**

#### **Background**

The welfare and safety of children are paramount in all of Rosslyn Academy's policies and procedures. This includes valuing them, regarding them positively, and treating them with respect and care at all times. **Adult staff and volunteers assume the full burden of setting and maintaining clear, appropriate boundaries in all interaction with children.**

Healthy boundaries between staff and students help to:

- Enable students to be independent and growing young adults who are not overly dependent on staff members
- Teach students how to give and receive affection appropriately with adults and members of the same and opposite sex
- Keep staff members from seeking personal gain or self-worth from students
- Avoid the appearance of evil and protect staff and students from rumors and reports so that they can continue to be effective within the classroom and the community.
- Avoid staff favoring or showing differential treatment to particular children at the exclusion of others, or excluding children in a derogatory or embarrassing way in the presence of others.

The most effective way to prevent abuse of children is to be wise and vigilant in how we interact with our students. By being vigilant in following these standards for interaction with children we will reduce risk and demonstrate professionalism and wisdom in our interactions with students thereby protecting them from abuse.

All staff and volunteers who have roles with children are expected to interact with children in a mature, capable, safe, caring, responsible manner, with a high level of accountability. All staff and volunteers should maintain a proper teacher-student relationship, even on a friendship level. All conduct should foster proper respect for the faculty or staff member's God-given authority over the student. When this is forfeited, there can be damage to the educational experience as well as to the student's respect for God's authority. All adult staff and volunteers are responsible for giving and accepting feedback from others in order to maintain our high level of professionalism.

The Code of Conduct follows the three principles of increasing accountability, decreasing

isolation, and ensuring an appropriate balance of power.

This Code of Conduct includes, but is not limited to, the following expectations of staff and volunteers.

## **Code of Conduct**

### **Visibility**

All work with children shall be planned in a way that minimizes risks as far as possible. This includes being visible to other adults when working with children.

This can be accomplished by planning activities in areas where other adults are present and at a time when other activities are occurring. It can also be accomplished by installing windows in all classrooms, offices, and other rooms occupied by children or keeping doors open.

### **Overcoming Isolation**

At least two unrelated adults shall be present in work with children. When this is not possible, reduce isolation by having a minimum of two children present, informing the child's parent of your meeting, and doing it during a time and/or location where your interaction with the child is visible to others. Isolation could be overcome, for example, by taking two or more children to the bathroom together rather than only one, dropping off siblings last in a carpool, or taking your own child or spouse along when providing rides. An adequate number of adults will be present to supervise youth events.

Individual mentoring and/or disciplining students of the opposite sex outside of school hours is considered to be inappropriate and should only be occurring during school hours with accountability. Do not meet with students of the opposite sex individually for mentoring or disciplining without the knowledge of your supervisor and child safety officer.

### **Accountability**

When working with a child involves one-on-one contact, the following procedures shall be followed, as applicable. Always be accountable to other adults regarding your interactions with youth or children.

Counseling or other necessarily confidential meetings with children shall be done in an office

with a window in the door and only when another adult is in close vicinity, aware that the meeting is occurring, and willing to stay in the vicinity until it is completed.

Parents and/or supervisors are to be notified beforehand of any activities with youth or children. In an emergency situation, find someone to go with you if at all possible, or notify whoever is available.

## **Supervision**

Supervision also reduces risk. Program administrators shall periodically and randomly inspect classrooms, offices, work areas and other areas where children and adults are together.

## **Technology**

Rosslyn utilizes technology, such as internet filters and video surveillance systems to protect children from abuse and exploitation. Technology includes, but is not limited to, computers, notebooks, Internet, telephones, USB drives, MP3 players, and E-Readers. Technology , including cell phones, should be used appropriately to protect children or youth from abuse and exploitation, for example, to prevent downloading pornographic material from the Internet, access to inappropriate emails, chat rooms, or movies.

Staff should not have current students as contacts on social media accounts as there is a power balance issue. Social media tools include, but are not limited to the following: Facebook, Twitter, Instagram, SnapChat, WhatsApp, Flickr, YouTube, LinkedIn, Tumblr, blogs, wiki sites, instant or text messaging, and Skype. Communicating with a student using private messages rather than public messages (with the exception of messages that are necessary for school assignments or activities) is inappropriate. Communication with students via phone should be done only for the purposes of school assignments and school activities. Communication with a student regarding a student's personal concerns should be documented through writing and submitted to the teacher's supervisor and the child safety officer.

Any Rosslyn Academy official social media page must be monitored by at least 2 unrelated staff members. A supervisor must give permission to start the site and can have oversight in the content of the page. If a teacher wishes to use social media (with the exception of Google Classroom and Edmodo) in his/her classroom on behalf of the school, the teacher should seek approval from the supervisor, who can provide oversight into the content of the page.

Staff should also remember that student information is confidential and should not be shared online. Pictures or any other student identifiable information should not be shared online during

employment or once employment with Rosslyn Academy is concluded. The use of student pictures for a newsletter is only permissible with written permission from the student's parent or guardian.

In order to further protect children from abuse and exploitation, Rosslyn does utilize technology, such as internet filters and video surveillance systems.

## **Discipline**

Discipline should be used to teach and correct rather than punish. It should not include slapping, hitting, shaming, yelling at, or belittling a child.

## **Touch**

Because healthy, caring touch is valuable to children but unhealthy touch is abusive, the following guidelines apply. Touch shall be open rather than secretive. Touch should be in response to the need of the child, and not the need of the adult. Touch should be age-appropriate and generally initiated by the child rather than the adult. It should be with the child's permission and any resistance from the child should be respected. Touch should always communicate respect for the child. Adults should avoid doing things of a personal nature for children that they are able to do for themselves.

Adults and other youth or children should not hit, slap, pinch, push, hold against their will, or otherwise assault children.

The following signs of affection are generally appropriate within specific contexts: verbal praise, side hugs, shoulder to shoulder hugs, pats on the shoulder, back, or head (when culturally appropriate). For smaller children, touching their hands, face, shoulders, and arms around their shoulders, hugs, or holding them when others are present.

The following behaviors between staff or volunteers and children are inappropriate or may be perceived as inappropriate and shall not be engaged in: touching buttocks, chests, genital areas, or thighs; showing affection in isolated areas or when alone with a child; sleeping in bed with a child; inappropriate comments that related to physique or body development; flirtatious or seductive looks; any form of affection that is unwanted by the child; showing sexually-suggestive videos or playing sexually-suggestive games with any child; any behavior that could be interpreted as sexual in nature.

Co-workers shall monitor each other in the area of physical contact, helping each other by

pointing out anything that could be misinterpreted.

### **Verbal Interaction**

Words can also be used to support and encourage a child, such as praise, positive reinforcement, and appropriate jokes. Inappropriate verbal interaction includes the following: shaming, belittling, humiliating, name calling, using harsh language that may frighten, threaten, or humiliate the child, cursing, or making derogatory remarks about the child. Adults shall avoid favoring or showing differential treatment to particular children or youth to the exclusion of others. Inappropriate verbal interaction also includes telling off-color or sexual jokes, making sexually suggestive comments, telling inappropriate discussions about sexual encounters or desires with children.

### **Parent Involvement**

Parents are responsible for knowing where their children are at all times. Therefore, parents shall be informed of planned school activities. Parents shall be encouraged to make unannounced visits to program activities, as this also reduces the risk of abuse.

**The Rosslyn Academy Child Safety Code of Conduct,  
May 2020 Acknowledgement Form**

I acknowledge that I have attended or watched this year's Rosslyn training in child protection. I have read (within the last 30 days) Rosslyn's Child Protection Policy and Procedures. I agree to abide by the Code of Conduct in Rosslyn's Child Protection Policy. I acknowledge that I am expected to know and be familiar with the contents. I understand that this code and the procedure manual may be updated from time to time and that I will be responsible for reading and complying with the updates.

I have never been the subject of an investigation of any form of child abuse by civil authorities.

I have not engaged in sexual abuse, physical abuse, a pattern of emotional abuse, or the exploitation or neglect of a child and agree not to engage in any such behaviors.

I have never been the subject of a complaint, disciplinary action, or dismissal by an employer, church, ministry, or other volunteer organization following an allegation of any form of child abuse. (Note: If I have been the subject of an allegation of any form of child abuse, regardless of the outcome of the allegation, I have notified the Rosslyn Superintendent, whose responsibility is to notify the Child Safety Officer).

I understand Rosslyn takes allegations of child abuse seriously and that abuse in any form will not be tolerated. I understand that Rosslyn will cooperate with civil authorities in the investigation of any report of abuse.

I agree not to engage in any such behavior. I further agree that as an individual who has engendered trust from a child I will not tolerate physical, emotional or sexual child abuse or neglect.

I agree to immediately report any suspicion, concern, or disclosure of any child being at risk of harm, whether in school or outside of school, immediately to the Child Safety Officer.

I agree to report any identification of a student engaging in self-harm, having suicidal thoughts, or having thoughts of harm to others to the lead counselor (Please also refer to the Suicide & Self-Injurious Behaviors Policy).

As a member of Rosslyn Academy, I agree to participate fully in any response of child safety. I understand that if I am the subject of a misconduct case, the results of the review may be communicated with my sending or receiving entity.

I have read this acknowledgement form, understand its contents, and voluntarily sign it.

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Name

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Date

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Signature

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Position



## Appendix B: Reporting Guidelines

### Reporting Guidelines For Students: Examples of what and where to report

| Level 1   | Level 2  | Level 3  |
|---|--|--|
| <ul style="list-style-type: none"> <li>● Lying</li> <li>● Cheating</li> <li>● Personal misuse of technology</li> <li>● Inappropriate language</li> <li>● Disrespect</li> <li>● Gossip/slander</li> <li>● Mocking/teasing</li> <li>● Disobedience</li> </ul> | <ul style="list-style-type: none"> <li>● Serious or repeated behavior that violates school behavioral expectations.</li> <li>● Consensual sexual activity between peers* above sixteen</li> <li>● Bullying between peers*</li> <li>● Discrimination</li> <li>● Violent behavior that is not defined as physically abusive behaviour</li> <li>● Possession of weapons</li> <li>● Gang activity</li> <li>● Possession or use of tobacco, alcohol or drugs</li> <li>● Possession or pattern of viewing pornography</li> <li>● Depression, eating disorders, self harm, and suicidal expressions or indicators (report directly to the Lead Counselor in your School)</li> </ul> | <ul style="list-style-type: none"> <li>● Abuse (physical abuse, sexual abuse, emotional abuse, neglect or exploitation) whether adult-to-student, student-to-student, contact or non-contact and including online behavior</li> <li>● Inappropriate behavior/relationships between adults and students</li> <li>● Harassment: aggressive pressure and intimidation including sexual harassment</li> <li>● Threatening or bullying younger/weaker students or a pattern of bullying behavior</li> <li>● Non-consensual, exploitative or concerning sexual activity involving anyone below 16.</li> <li>● Possession or distribution of child pornography</li> <li>● Abusive or inappropriate social media or online communication between students including nudes and sexting</li> </ul> |
| <p>Behavior corrected and disciplined by the teacher, activity advisor, or appropriate administrator/supervisor</p>   | <p>Repeated and/or serious behavior that warrants discipline and/or counseling -- involves the appropriate administrators</p>  | <p>This type of behavior initiates a response and the involvement of the Child Safety Team..</p>   |
| <p>Reported to and resolved by a staff member/administrator</p>   | <p>Reported to and resolved by administrator and/or counselor</p>  | <p>Reported to and resolved by the Child Safety Officer</p>  |

\*A peer relationship exists when there is not a significant difference in responsibility, trust, power, age, development, awareness, and/or understanding between the individuals.

Appendix C: Summary of Definitions and Procedural Terms in the Response Process

*Information Gathering:* The information gathering will include locating and preserving the physical evidence, getting medical/emotional help for the victim as soon as possible, notifying parents if there is a physical reason to do so.

*Initial Assessment* The goal of the initial assessment is twofold: ensure the safety of the alleged victim and the other students and to determine if a secondary assessment is needed. The Child Safety Team in consultation will determine if there is a need for further response. The preliminary report will indicate if the case warrants further response and will recommend whether a **Child Safety Assessment** and/or a **Misconduct Assessment** should be conducted. A Child Safety Assessment will focus on caring for the child and ensuring the safety of the child. A Misconduct Assessment will focus on holding a staff member accountable in a situation in which that staff member has breached a school policy.

*Child Safety Assessment:* If the case warrants further response in the form of a **Child Safety Assessment**, the Child Safety Team will conduct interviews, observations, research reports, and collect documents that will enable the team to make a Risk Assessment that will assess:

- a. The risk of harm & any risk factors
- b. The severity & probability of harm
- c. Protective factors, and safety needs.

**SEVERITY OF HARM**

|                   | <b>SEVERITY OF HARM</b> |            |         |         |
|-------------------|-------------------------|------------|---------|---------|
| <b>Likelihood</b> |                         | Concerning | Serious | Extreme |
| Highly Likely     |                         |            |         |         |
| Likely            |                         |            |         |         |
| Unlikely          |                         |            |         |         |

|  |  |
|--|--|
| High Risk. Leave of Absence or Return to home country Necessary.                 |  |
| Medium Risk. Accommodations and/or support plan necessary and monitor.           |  |
| Low Risk. Continue with current intervention or minimal accommodations required. |  |

*Statement of Findings:*

Once information is gathered, the Child Safety Team will analyse the information and create an outcome decision reported in a *Statement of Findings Document*. The Statement of Findings is a report containing the outcome decision which may also include a child safety plan, risk assessment, and organizational improvement plan.

*Child Safety Plan* - If the Child Safety Team determines that the risk of harm to the child is serious or extreme and likely, a protective plan and range of interventions will be developed by the Child Safety Team in conjunction with the counselors, Superintendent, and appropriate school personnel to assist the child and family. While not inclusive, the following actions may take place or may be considered:

- Provide counseling for the victim, the respondent and family
- Consider safety needs of the Victim and Family:
  - Interim Support, Protection and Supervision
  - Recommend medical attention and/or physical evaluation, if appropriate.
  - Recommend counseling and review the school's role in providing counseling
  - Assessment and/or other Professional Support Needs
  - Other needs, educational, social, emotional and medical
- Consider safety needs of the Respondent/s:
  - Recommend counseling and/or education and review the school's role in providing counseling
  - Interim Support, Protection and Supervision
  - Assessment and/or other Professional Support Needs
- Consider the safety needs of the community:
  - Recommend and/or provide counseling and education, if appropriate. The school may choose to employ the Member Care Team and/or the Counseling Team as appropriate.

- Recommend the administrative review of procedures.
- Identify any other Children who are at risk of Harm.

*Misconduct Assessment:* The Misconduct Assessment is an internal response to an allegation that determines if an adult has breached Rosslyn's behavioral standard, the severity of the breach, and the level of certainty that such a breach took place.

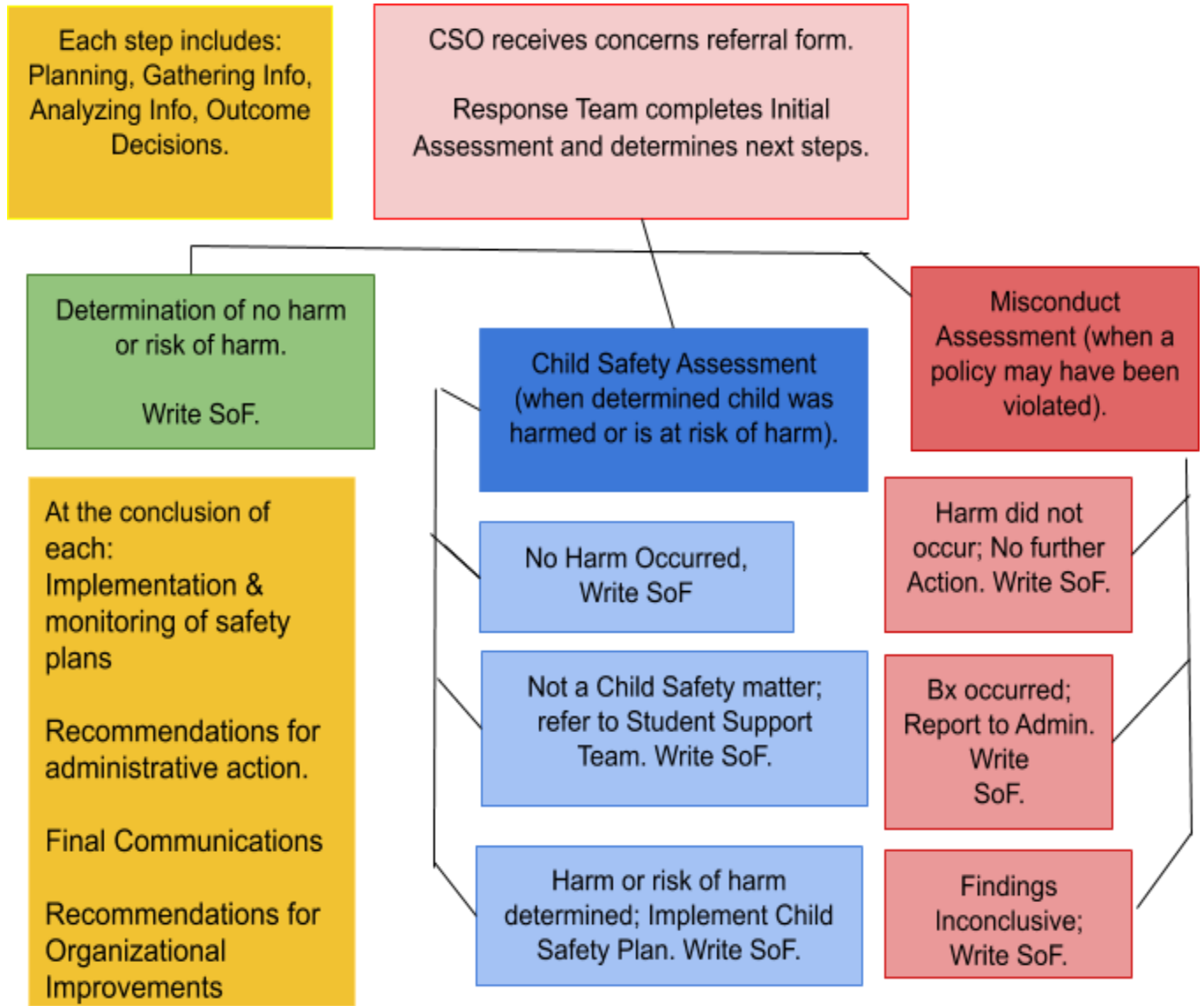
*Outcome Decisions:* An analysis of the information will determine any outcome decisions.

Outcome decisions may include:

- The report is not substantiated
- The alleged abuse is unsubstantiated but there is reason to suspect it either occurred or could happen.
- The report reveals probable cause and the parents work for the Embassy
- The report reveals probable cause and the parents don't work for any Embassy.

The report is substantiated and there is real risk of the safety and possible further harm of the child.

Appendix D: CHILD SAFETY RESPONSE PROCESS FLOWCHART



## Appendix E: Rosslyn Academy Statement of Findings Template for an Internal Response

### **Rosslyn Academy Statement of Findings of the Internal Response Regarding (Name)**

*Date*

#### **Inquiry Findings**

##### **Information**

*Give an outline of why an inquiry has been conducted*

##### **History of the Report**

*Give details of who received the report, when, how it was followed up, the procedure that was used and how the decision to go to a full inquiry, or not, was made. Attach any appendices documenting these decisions.*

##### **Summary of the Report**

*Provide a summary of the report, what were the issues identified and the focus of the report, make reference to any issues out side of the SoF that may be held in a Report of Findings, link the two documents here.*

##### **Additional Information Gathered**

*List all the details of the findings here, include the timeline (standard feature) and chart documenting what information was corroborated or not (standard feature). Use as much details as is needed to demonstrate why a conclusion has been made. Separate out different situations so it is easy for the logic of the conclusion to be seen.*

##### **Rosslyn Academy Standard of Conduct Policy**

Rosslyn Academy is an organization that has a standard of ethics and conduct that reflects biblical principles; these principles apply to everyone. Acceptable student behaviour is outlined in the Student Handbook.

*Cut and Paste from the standards document the relevant section of the standard or other behavioral standard being applied to the conclusion. There is no need to paste sections not applicable to the issues being inquired about.*

##### **Conclusion**

*Attach as an appendix the assessment of the information (as many sheets were used).*

*Make a conclusion from the findings being compared to the standard in consideration of the assessment of the credibility of the information the team has received.*

*Document each issue separately so if there have been 4 individuals who experienced the abusive/inappropriate behavior list each conclusion separately.*

*Where there is no confession or corroborating information the phrase "on the balance of probability" should be used to indicate we don't have information beyond reasonable doubt and are using the level of evidence on the balance of probability.*

*Make a note if the team feel the conclusion is solid or could be disputed.*

The above findings are submitted on behalf of the Rosslyn Academy Child Safety Office,

Child Safety Team Member

Date

## **Risk Assessment (that has lead to the action plan)**

*In situations where the policy and standards are not being applied directly, a risk assessment needs to be included in the master SoF so if something goes wrong later was can look back and see where the decision was taken and what the criteria was. If there is a deviation from a policy then there needs to be a statement as to why policy as not followed, this makes defense to law and CSPN easier. Each risk assessment would be different so there can be no template but this example is used to demonstrate the way a risk assessment was used to not have a family return stateside nor have "required" counseling.*

In considering the action plan two risk assessments were made.

1. What is the risk to the on-going safety of the XYZ's children?
2. What is the risk to XXXXX's long-term health?

## **Action Plan**

### **Administrative Actions**

1. Rosslyn Academy takes seriously its responsibility to protect and nurture children, creating a safe and positive environment in which to grow. We believe it is never acceptable for any child to experience abuse of any kind.

...

*Person responsible:*

*Accountability to:*

2. Following Rosslyn Academy's policy requirement, ...

*Person responsible:*

*Accountability to:*

### **Supportive Actions**

3. Rosslyn Academy will work with XXXXXX to support them in ....

*Person responsible:*

*Accountability to:*

*Person responsible:*

*Accountability to:*

I have reviewed the information compiled; compared it with Rosslyn Academy policy, standards and definitions; and applied the administrative outcomes and action plan as required by Rosslyn Academy policy.

Sincerely,

Child Safety Officer  
Rosslyn Academy

## Appendix F: Technology Policy for Student Handbooks

### Technology Policy for Student Handbooks

The use of electronic devices at Rosslyn Academy is a privilege which may be removed if students are found to be in violation of the Acceptable User Policy and/or Rosslyn Academy's Student Expectations & Discipline.

If a student's personal device (phone, tablet, e-reader, computer, etc.) is used in a manner that violates the above policies, Rosslyn reserves the right to confiscate and search the device if there are reasonable grounds for believing that the search will turn up evidence that the student has violated or is violating either Kenyan law or the rules of the school.

Student behavior, whether on or off campus, and including Internet postings, reflects on the name of Christ, reputation of Rosslyn Academy. Therefore, students involved in major misconduct on or off campus and including the Internet, that reflects negatively the name of Christ, Rosslyn Academy, or substantially disrupts the work and discipline of the school, may be subject to disciplinary action, including expulsion.

Rosslyn Academy reserves the right to monitor and log the use of its technology and computer network, monitor network utilization by users, and examine user files and materials as needed. Therefore, users cannot expect absolute privacy from the school's technology personnel as it relates to the use of Rosslyn's computer network. Users must recognize that there is no assurance of confidentiality with respect to access to transmissions and files, by persons outside or from persons inside Rosslyn Academy. Rosslyn Academy reserves the right to deny individual users access to specific technology as a consequence of misuse



## Appendix G: Chaperone Guidelines

### ROSSLYN ACADEMY Chaperone Guidelines

When planning an event that requires chaperones or supervisors, the following guidelines are to be followed:

1. Chaperones for any event must consist of a minimum of two adults and meet the appropriate ratio of chaperones to students:
  - a. *All On-campus events:* 1:15
  - b. *Middle or High School Off-campus/Overnight events:* 1:10
  - c. *Grades P to 3 Off-campus/Overnight events:* 1: 6
  - d. *Grades 4-5 Off-campus/Overnight events* 1:8
  - e. *All events involving water (e.g. swimming)*
    - Follow the above guidelines but need to take into consideration and make arrangements for (whenever possible) a chaperone with lifeguarding qualifications if there will be no official lifeguard at the pool. Otherwise, please follow the hosts recommendations and be extra vigilant in supervising students.
2. Events that involve students of both genders should include chaperones representative of both genders.
3. Chaperones should consist primarily and predominantly of Rosslyn Academy staff members.
4. Staff members should come from the relevant school for which the event is taking place, when possible.
5. All parent chaperones will need to complete the following steps *prior* to chaperoning an event:
  - a. Attend a Student Safety/Code of Conduct training
  - b. Sign and turn in the Rosslyn Academy Code of Conduct
  - c. Complete and turn in the Rosslyn Academy Staff & Volunteer Information Form
6. Staff members should avoid chaperoning an event with their spouses, unless given expressed permission by the School Principal. It is noted that CFS and Senior Trip does at times utilize the spouses of staff members as chaperones. Chaperones should take additional precautions to ensure that the appropriate Student Protection procedures are followed in such a case.
7. The individual in charge of the event (in consultation with the respective Principal) will be responsible for selecting approved chaperones, maintaining the appropriate ratio and composition of chaperones, and ensuring that chaperones remain vigilant and complete all necessary tasks throughout the event.

8. Expressed permission will need to be granted by both the School Principal and Child Protection Officer for chaperones who are neither staff members nor on the approved chaperone list, with additional steps required for approval.

## **ROSSLYN ACADEMY**

### **Expectations for Chaperones**

Staff Chaperones and Volunteer Chaperones assume the full burden of setting and maintaining clear, appropriate boundaries in all interaction with children. The best way to prevent the abuse of children and to reduce situations that put our students at risk is to be wise and vigilant in how we interact with our students. All Chaperones are expected to follow the Principles of the Child Safety Code of Conduct (Please see the Code of Conduct for further guidelines):

- Avoid Isolation
- Increase Accountability
- Increase Visibility

In addition to these guidelines, Chaperones are expected to take the following into consideration:

1. All school rules apply. Chaperones are expected to comply with school policies as outlined in the Code of Conduct, the Basic Tenets of Beliefs, and the Student and Staff Handbooks.
2. Chaperones are expected to comply with directions given by the supervising staff member, work cooperatively with other staff and volunteers, and model appropriate behaviors for students.
3. While chaperoning, chaperones may not use, sell, provide, possess, or be under the influence of tobacco, drugs, or alcohol. They may not use or possess any weapon that is not pre-approved by administration. If pangas are required for a project, chaperones should closely supervise their use and promptly collect them afterwards. Please check with your administrator if you are unsure if an item is considered a weapon or if it is approved for a certain work site.
4. Chaperones may not administer any medications, prescription or nonprescription, to students without the consent of parents. Students attending overnight functions who need to take medication should have a parent sign a consent form for Chaperones to administer medications as directed by the parents. It is the chaperones' responsibility to follow and review student health forms for allergies and what medications parents consent to.
5. Students must be supervised at all times while at the school event. Chaperones may be assigned to a small group of students or students in a specific area. Their job will be to engage with and help the students learn and/or behave appropriately. On field trips, if a

chaperone is assigned a group of students, the students must stay with the chaperone at all times. Chaperones must:

- a. account for all students regularly and before changing activities
  - b. know when and where to meet the rest of the group at the end of the visit
  - c. be readily available,
  - d. be mindful of safety concerns, and
  - e. respond to student needs.
6. Student behavior is a chaperone's responsibility. School rules related to student behavior apply. Chaperones should review rules and standards of behavior, safety rules, and any site-specific rules with students. They must ensure that students do not get involved in extra activities that are not pre-approved.
  7. For the protection of both the student and the chaperone, chaperones should not place themselves in situations in which they are alone with a student, especially a student of the opposite gender. Chaperones should also not invite a student or a group of students into their room.
  8. Chaperones should be aware of students' sleeping arrangements on trips and take care to increase accountability and avoid isolation.
  9. On overnight trips, chaperones should be aware of interactions between students and the local hosts or community. They must watch for situations in which the students may feel uncomfortable and avoid placing students in situations in which their safety may be compromised.
  10. On CFS or service project trips, students are often visiting a church or school. Chaperones should pay specific attention to where students are during this time. Chaperones need to be extra cautious when students are taking tours of schools, going into classrooms without supervision, and visiting homes of community members. Chaperones should utilize the buddy system, review any pertinent safety information, and take into account the three principles of reducing risk (accountability, minimizing isolation, and visibility) as much as possible. If students are spread out and teaching in different rooms, chaperones should make frequent rounds checking on them.
  11. Chaperones should be sure to know what to do in an emergency (medical emergency, natural emergency, lost child, serious breach of a school or trip rule, etc...). They should know who is first-aid trained, where the first aid kit is, and who has copies of permission slips with emergency phone numbers and medical information.
    - a. If a student indicates that they want to hurt themselves, have hurt themselves, want to hurt someone else, or someone is hurting them, chaperones are mandated to report it to a Supervisor or Counselor immediately.
    - b. If a student indicates that s/he is being abused or has been abused, chaperones should report it to a Supervisor or Child Safety Officer immediately.

**ROSSLYN ACADEMY STAFF & VOLUNTEER FORM**

**Please turn into the Event Supervisor or the Administration Member in Charge.**

NAME: \_\_\_\_\_

PHONE NUMBER: \_\_\_\_\_

**EMERGENCY CONTACT:**

NAME: \_\_\_\_\_

RELATIONSHIP: \_\_\_\_\_

CONTACT: \_\_\_\_\_

**EMPLOYER:**

NAME: \_\_\_\_\_

CONTACT: \_\_\_\_\_

By signing below, I am acknowledging that I have completed the Student Safety/Code of Conduct Training and signed the Code of Conduct.

\_\_\_\_\_  
Signature and Date

## Appendix H: Mentoring Guidelines

### **Rosslyn Academy Mentoring Guidelines**

**ABOUT MENTORING:** Rosslyn Academy defines mentoring as meeting regularly with a student for discipleship and intentional relationship in order to assist the student's development in their spiritual, academic, physical, social, and emotional lives. Relationships that fall into this category are those within the Mentoring Program, as well as similar relationships in which an adult regularly meets one-on-one or with a small group of students. These one-on-one meetings or small group meetings often occur for the purposes of pouring into a child spiritually, academic tutoring, or mentoring a student in their social and emotional lives and are relationships not already encompassed through regular classes or other groups/programs approved by the school. Mentoring relationships may occur on or off campus, during school or outside of school hours.

Anyone who mentors must come under the authority, permission, and screening of the Rosslyn Chaplain Department and the appropriate Principal. No one associated with the school may mentor a Rosslyn Academy student without permission from the appropriate Principal (in conjunction with the Chaplain and Child Safety Office). The Chaplain department will monitor and provide accountability for the mentoring throughout the year. Any concerns or problems should be reported to both the Chaplain Department and the Principal.

Rosslyn Academy wants to be vigilant in protecting students from all forms of abuse. Because of the intimate nature of mentoring, mentors must do all they can to prevent and protect students and themselves from abuse or false accusations of abuse. The following guidelines are meant to help mentoring relationships be safe, healthy, godly, and rich.

#### GENERAL EXPECTATIONS:

- Mentors should meet with students once every one or two weeks. If students want to meet outside of the school day, mentors should notify the Chaplain Department and the Principal for accountability.
- All mentors who are not Rosslyn staff must complete the Volunteer Application process through the HR office, which includes a background check, and Rosslyn Academy's compulsory Child Protection Training.
- Mentors must contact the student's parents to introduce themselves and let parents know when and where the mentor plans to meet with the student. Though mentors do not need to be reporting to parents about their conversations, parents need to be informed about who is investing in their child, when, and where.
- When Meeting in a mentoring group, there should be more than one adult present.
- Mentors should be aware that they may need to refer a student to a counselor. Topics that *must* be referred are: suicidal thoughts, intent to harm self or others, abuse of self, sexual abuse, and

harassment. These must be reported to the Counselor. We encourage mentors to inform students at the beginning of mentoring relationships that they are required to report these topics.

#### MEETING WITH A STUDENT:

- Mentors are encouraged to meet with students during regular school hours. They can meet during study hall or lunch.
- In accordance with Rosslyn's Code of Conduct, mentors and students must meet in a public area - at school, at a restaurant, etc. Mentors may, however, meet in a home given there is another adult present in the home and parents are informed. Mentors are responsible for arranging transportation in consultation and with permission of parents. As per our Child Safety Code of Conduct, Rosslyn staff members are to decrease isolation and increase accountability. When providing transportation for a student, staff members will attempt to limit isolating themselves with a student and seek accountability by requesting permission from the student's parents and notifying their supervisor and child safety officer.
- If mentors unexpectedly have a meeting with a mentee off campus or encounter some other situation that they are uncertain about, they should immediately notify the Child Safety Officer, SLD/Chaplain, or Principal about this event. While the school does not want to make things overly complicated, Rosslyn Academy does want to stay above reproach in protecting all parties involved.

#### SAMPLE PARENT CONTACT EMAIL:

Mr. and Mrs. Doe,

My name is Name of Mentor and I am one of the Chaplains/Teachers/etc. at Rosslyn Academy.

Part of what makes Rosslyn unique is the mentoring relationships that our staff offer to any interested students. Name of Student indicated that he/she would like to meet regularly with me in a mentoring capacity. I wanted to introduce myself so you'd know who I was and be informed about when and where we'll be meeting.

Name of Student and I have decided to meet every Date of Meeting. Usually, we'll meet Location of Meeting, though there might be a few times that we go to Java House or Artcaffe. My aim for our time together is really just to get to know (the Name of Student) and hear about his/her life, what he's/she's thinking, where he/she struggles, and be an encouragement to him/her in those things.

If you have questions or concerns, or would like to know more about me, please let me know. You can contact me at mentor's contact information. If you have questions about Rosslyn's emphasis on mentoring in general, you can contact the Spiritual Life Director, MS/HS Chaplain, or Principal.

Mentor's Name & Position

## Appendix I: Child Safety Policy for Virtual Learning

### **Child Safety Policy for VLE**

The following policy is an extension of Rosslyn Academy's Child Safety Policy and Basic Tenets & Staff Expectations. As such, all interactions with students should follow the guiding principles of Decreasing Isolation, Increasing Accountability, and Maintaining appropriate Balance of Power.

This policy applies to situations in which the school moves to an online or virtual learning platform - whether for a day or for an extended period of time.

Principles of VLE Child Protection:

- Follow school child protection policy (Code of Conduct) and Basic Tenets & Staff Expectations
- Contact with students should be observable and interruptible
- Maintain reasonable boundaries - avoiding contact that a reasonable person might question
- Avoid being alone or causing someone else to be alone (by showing up late to scheduled meetings or by failing to record meetings) with a student.
- Report child protection concerns to Child Safety Officer by filling out the following: Child Safety Initial Reporting Form
- Ensure your social media is private and inaccessible to students.
- Seek educational solutions to educational questions. Assess risk if you are not sure.

Communication Guidelines:

The following guidelines should be observed during any digital or online contact with students:

- All communication with students should have an educational purpose.
- Communication should be observable - Meetings should be recorded and conducted in a place that is observable and interruptible.
- Communications should follow school policy which states that one-on-one interactions should be avoided. When it is determined to be in the educational best interest of the child, seek out parents permission, include other colleagues, inform supervisors, or meet with groups (find ways to increase accountability) and record the sessions.  
Communication with multiple students is preferred.



- All communications should be through school platforms (school email and Google Meets) and where possible on the school WIFI. There may be exceptions for teachers who live off-campus; however it is recommended that teachers use content filtering software on their home computers whenever possible.
- Adults are responsible for maintaining appropriate boundaries. This is not the job of the student.
- Any mentoring online will only occur by chaplains or with the approval of the chaplain department and appropriate administrator. Mentoring will occur in groups of students with the permission of parents.
- All interactions whether teaching or mentoring should continue to follow the underlying principles of increasing accountability, avoiding isolation, and maintaining an appropriate balance of power. The mentoring policy will still apply. Any mentoring groups that occur online should be run through the chaplain department and must include another teacher. The chaplain or administrator should be given access to the mentoring forum.

Avoid the Following:

- Creating a too casual or too intimate atmosphere: intimate locations, casual dress, nicknames, private conversations, observational comments about home or family, oversharing personal details. Maintain a professional tone to maintain boundaries.
- Avoid the temptation to change platforms if communication is disrupted by technical difficulties. Reschedule the session instead.
- Unclear expectations: Ensure Google Meet sessions are predictable, structured, and distraction free.
- Code of conduct violations: Meeting children on other platforms, taking photos or screenshots of students, out of program contact, favoritism, derogatory or sexist remarks, being under the influence of alcohol or drugs (and interacting with students) are grounds for disciplinary action or dismissal.