

ABUSE PREVENTION POLICY MANUAL



The Awty International School

Developed by:
Praesidium, Inc.

◆ Introduction ◆

Introduction

The Awty International School understands that you already have an important role in student's lives, and serving as a protector is a natural extension of that. Your Head of School is available to answer any questions you may have regarding these policies. Your dedication to the students in your care is essential, and we know you are committed to protecting them from the devastating effects of sexual abuse.

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◆ Policy Overview – Screening and Selection ◆

The Awty International School understands that the first step in creating a safe environment is careful screening and selection of those who work closely with children in our school. Before being approved for hire, all applicants (regular, temporary and substitute) must complete the following items:



- Standardized application.
- Volunteer Training Course Online or in person
- Criminal background check.
- Sex Offender Registry check
- Statement of compliance with The Awty International School's Code of Conduct and abuse prevention policies.

The Awty International School will not employ or retain any person who has been convicted of any sexual offense or violent crime and expects the cooperation of all staff including the complainant, witness and the accused offender. The Awty International School may interview these individuals privately and take oral and/or written statements from them. Any staff member who fails to cooperate with such an investigation or to provide complete and truthful information may be subject to disciplinary action.

◆ Policy Overview – Education and Training ◆



Employees who are trained in abuse prevention are more likely to understand their role as protector, to recognize the signs that abuse is occurring, and to report suspicious or inappropriate behaviors. Trained staff members are also less likely to place themselves in situations where they could be falsely accused.

In order to educate employees how to detect the warning signs of abuse, all The Awty International School personnel are required to complete the following training courses (documentation of all training will be maintained in personnel files):

1. A basic abuse risk management training within 30 days of beginning work with students. Content must include the following areas:
 - Effects of sexual abuse.
 - Types of child molesters.
 - Characteristics of abusers.
 - How child molesters operate: access, privacy, control.
 - Identifying and managing high-risk situations such as nap time, bathroom use, transition times, and free times.
 - Methods to identify and prevent abuse between students.
 - Protecting yourself from false allegations.

2. Every three years abuse prevention training renewal.
 - Application of introductory content to current situations.
 - Review of current school policies and past incidents.

◆ Policy Overview – Interactions and Conduct ◆

The Awty International School has developed specific guidelines for appropriate interactions with students. With clear standards in place, everyone knows the rules, violations are more easily detected, and false allegations are less likely to occur.

- 1. Code of Conduct** – All The Awty International School personnel are required to sign the Code of Conduct as a term of employment.
- 2. Physical Interactions** – A policy that clearly defines appropriate and inappropriate physical interactions between staff and students protects all parties. The Awty International School policies for appropriate and inappropriate physical interactions are:



<i>Appropriate Physical Interactions</i>	<i>Inappropriate Physical Interactions</i>
<ul style="list-style-type: none"> • Side hugs. • Shoulder-to-shoulder or “temple” hugs. • Pats on the shoulder or back. • Handshakes. • “High-fives” and hand slapping. • Verbal praise. • Pats on the head when culturally appropriate. • Touching hands, shoulders, and arms. • Arms around shoulders. • Holding hands (with smaller children in escorting situations). 	<ul style="list-style-type: none"> • Full frontal hugs. • Kisses on the mouth. • Touching bottom, chest or genital areas. • Showing affection in isolated areas of the building. • Staff sleeping in bed with a child. • Touching knees or legs. • Wrestling. • Piggyback rides. • Tickling. • Allowing a child to cling to a staff leg. • Any type of massage given by or to a child. • Any form of affection that is unwanted by the child or the staff. • Compliments that relate to physique or body development.

◆ **Policy Overview – Interactions and Conduct (continued)** ◆

3. **Verbal Interactions** – A policy that clearly defines appropriate and inappropriate verbal interactions between staff and students protects all parties. The Awty International School policies for appropriate and inappropriate verbal interactions are:

<i>Appropriate Verbal Interactions</i>	<i>Inappropriate Verbal Interactions</i>
<ul style="list-style-type: none"> • Positive reinforcement. • Appropriate jokes. • Encouragement. • Praise. 	<ul style="list-style-type: none"> • Name calling. • Discussing sexual encounters or in any way involving children in the personal problems or issues of staff. • Telling secrets. • Cursing. • Telling off-color or sexual jokes. • Shaming. • Belittling. • Making derogatory remarks. • Using harsh language that may frighten, threaten or humiliate children. • Making derogatory remarks about the child or about his/her family.

◆ **Policy Overview – Interactions and Conduct (continued)** ◆

4. **Discipline Practices** – A policy that clearly defines inappropriate discipline practices protects all parties. The Awty International School policies for inappropriate discipline practices are:

<i>Inappropriate Discipline Practices</i>	
<ul style="list-style-type: none">• Hitting.• Spanking.• Shaking.• Slapping.• Using physical exercise as a consequence.• Withholding food, light, or medical care.• Name calling.• Shoving.	<ul style="list-style-type: none">• Pulling hair or ears.• Biting.• Pinching.• Shaming.• Using derogatory remarks.• Ostracizing.• Using mechanical, tape, or rope restraints.• Punishing for toileting accidents.• Yelling angrily

◆ Policy Overview – Interactions and Conduct (continued) ◆

5. One to One Situations – Most abuse occurs when an adult is alone with a child. The Awty International School aims to eliminate or reduce these situations. However, when they are necessary, staff should observe the following guidelines to manage the risk of abuse or false allegations of abuse:



- Avoid physical affection that can be misinterpreted. Limit affection to pats on the shoulder, high-fives, and handshakes.
- Document any unusual incidents, including disclosures of abuse or maltreatment, behavior problems and how they were handled, injuries, or any interactions that might be misinterpreted.
- Leave the door open or move to an area that can be easily observed by others passing by.
- Inform other staff (i.e., administrators, other staff) that you are alone with one child.
- Ask other staff to randomly drop in.

6. Gift Giving – Molesters routinely groom children by giving them gifts as a way to endear themselves to children. Sometimes they instruct the child to keep the gifts a secret; this then starts to teach the child to keep secrets between the molester and the child. For this reason, staff should only give gifts to a single child under the following circumstances:

- Administration must be made aware of and approve the gift.
- Parents must be notified.

◆ Policy Overview – Interactions and Conduct (continued) ◆

7. **Contact Outside of Regular School Activities** – Many cases of organizational abuse occur off-site and outside of regularly scheduled school activities. Contacts outside of regularly scheduled activities may put students, staff, and the school at increased risk. The Awty International School strongly discourages personnel from contacting students outside of regular school activities.

Under some circumstances, school personnel may find it beneficial to a student to spend time with the student outside of regularly scheduled school activities. The Awty International School policies for appropriate and inappropriate outside contact are:

<i>Appropriate Outside Contact</i>	<i>Inappropriate Outside Contact</i>
<ul style="list-style-type: none">• Taking groups of children out for dinner after a school sponsored event.• Taking groups of children to a sporting activity.• Attending functions at the child's home, with parents there.• Home visits, with parents there.• Having groups of children in the home of an employee.	<ul style="list-style-type: none">• Taking one child on an outing without the parents' written permission.• Visiting one child in the child's home, without a parent being present.• Entertaining one child in the home of an employee.• Individual child spending the night with an employee.

To ensure the safety of all involved, school personnel must adhere to the following practices when engaging in appropriate outside contact:

- All contact must be approved in writing by the appropriate school administrator in advance of the contact. The school personnel making the request must describe the purpose of the contact, the nature of the activity, when the contact will occur, where the contact will occur, and the names of other students and adults who will be present.
- The parent(s) of the students involved must also be notified in writing, with a copy of the notification supplied to the school administrator.
- At least one other unrelated Awty employee must be present and parents should be invited to attend any approved children's activities in the home of an Awty employee.
- School personnel are strongly discouraged at all times from spending time alone with a lone student.
- Under no circumstances may school personnel and students share sleeping quarters.
- Under no circumstances may school personnel disrobe in the presence of students.
- From time to time, school administrators must question students who spend time with school personnel outside of regularly scheduled school activities to describe the activities.

- 8. Electronic Communications Policy** – Any electronic communication with students, including the use of social networking websites like Facebook.com, instant messaging, texting, and blogging or leaving comments on blogs, is prohibited. All personal social networking profiles and blogs of school personnel must be private and inaccessible to students. School personnel with personal profiles on social networking sites may not request to be friends with students or approve friend requests from students.

School personnel are prohibited from emailing students using their personal email accounts. All email communications with students should occur on Awty email accounts, and be copied and/or forwarded to supervisory personnel and parents or guardians.

- 9. Transporting Students** – Transporting students may increase the risk of abuse or false allegations of abuse because a staff person may be alone with a student or may make unauthorized stops with a student, e.g., to the staff person's home. The Awty International School strongly discourages personnel from transporting students outside of regular school activities.

Under some circumstances, such as field trips or extra-curricular activities, a staff member may find it necessary to transport a child. To ensure the safety of all involved, school personnel must adhere to the following practices:

- Staff must use the “rule of three” when transporting children in vehicles. At least two adults are required to transport a single child. At least two children must be present if transported by a single adult.
- Children must never be transported without written permission from a parent.
- Children should be transported directly to their destination. No unauthorized stops should be made.
- Staff must document beginning and ending time and mileage, the names of students and staff who are involved in transportation, purpose of the transportation, and destination.
- Staff should avoid unnecessary physical contact with children while in vehicles.
- Administrators must be informed.

- 10. Student to Student Interactions** – Most incidents of serious student-to-student abuse are preceded by more subtle incidents like name-calling, taunting, or rough-housing. Interrupting these interactions early, and establishing well-known standards of conduct, can keep the school environment safe. The Awty International School recognizes that the following interactions are high-risk and should be prohibited:

- Hazing.
- Bullying.
- Derogatory name-calling.
- Games of truth or dare.
- Singling out one adult or child for differential treatment.
- Ridicule or humiliation.

◆ Policy Overview – Monitoring and Supervision ◆



The Awty International School recognizes that monitoring and supervision are critical functions of abuse prevention that provide protection to students, staff, and the school. When interactions are monitored, allegations of improprieties or wrongful acts are more easily and accurately investigated and resolved. The Awty International School has established the following policies to ensure that all school personnel understand their role in this process.

1. **Administrative Visits** – School administrators regularly monitor staff interactions with students in different activities in order to ensure that classrooms are well-managed and that policies are observed.
2. **Ratios** – Each class or program should follow appropriate ratio requirements in order to ensure adequate monitoring of students and prevent staff from being too overwhelmed to monitor the activities of other staff members. Personnel should be aware of ratio requirements for all classes or other activities that they are responsible for monitoring. All school programs outside of the classroom must be supervised by at least two unrelated adults.
3. **Mixed Age Groups** – In most incidents involving a child abusing another child, the children are from different age groups. Each program is responsible for establishing specific guidelines for additional monitoring and supervision of programs that involve children from different age groups. Personnel should be aware that close line of sight supervision is required when monitoring programs that mix age groups.
4. **Bathrooms** – Most abuse in schools occurs in the bathrooms. Personnel should be aware of their school's unique bathroom policies, which include:
 - Personnel should monitor the bathrooms during transition periods to ensure that students are not lingering in the bathroom.
 - Instruct students which bathrooms to use.
 - When escorting a group of students to the bathroom line the students up next to the bathroom and do not send in more students than there are stalls. As one student comes out, send the next student in. Stand at the doorway and ensure students are coming out in a timely manner.
 - Encourage elementary school students to use the bathroom as a group during transition periods.

Bathroom (Continued)

- When middle school or high school students need to use the bathroom during class time require that they ask permission. Keep note of when the student left and ensure their timely return.
- Exceptions to the policy should only be extended for emergencies.
- Make note of students who abuse the exception.
- All staff, including security personnel, should routinely duck into bathrooms and announce their presence during passing periods and any time they travel throughout the school.

5. **Unused or Limited** risk areas in The Awty include along the fence PAAC, in the PAAC offices and locker monitoring of these the risk of abuse. The school has designated as off limits to students supervised: the PAAC. Personnel should be aware of The Awty International School's policies regarding monitoring unused or limited use areas, which should include:



Use Areas – High-International School line behind the near the coaches rooms. Inadequate areas may increase Awty International the following areas except when

- Classrooms, meeting rooms, and offices have windows that permit observation.
- Classroom windows should remain unobstructed.
- Students are prohibited from entering staff-only areas.
- Unused classrooms should remain locked prior to 8:00 am and after 3:30 pm.
- If possible, school personnel use video surveillance equipment to monitor high-risk locations and for suspicious behaviors.

6. Bullying Policy

Awty is committed to providing all students with a safe environment in which all members of the school community are treated with dignity and respect. This school will not tolerate any behavior that is classified under the definition of bullying, and to the extent that such actions are disruptive of the educational process, will take steps needed to eliminate such behavior.

Bullying is aggressive behavior that is intentional, is repeated over time, and involves an imbalance of power or strength. Bullying can take on various forms, including:

- Physical bullying – when one engages in physical force against another, such as by hitting, punching, pushing, kicking, pinching, or restraining another.

- Verbal bullying – when someone uses their words to hurt another, such as by belittling or calling another hurtful names.
- Nonverbal or relational bullying – when one person manipulates a relationship or desired relationship to harm another person. This includes social exclusion, friendship manipulation, or gossip. Or intimidating another by using gestures.
- Cyberbullying – the intentional and overt act of aggression toward another person by way of any technological tool, such as email, instant messages, text messages, digital pictures or images, or website postings (including blogs). Cyberbullying can involve:
 - Sending mean, vulgar, or threatening messages or images;
 - Posting sensitive, private information about another person;
 - Pretending to be someone else in order to make that person look bad; and
 - Intentionally excluding someone from an online group.
- Hazing – an activity expected of someone joining or participating in a group that humiliates, degrades, abuses, or endangers that person *regardless* of that person's willingness to participate.
- Sexualized bullying – when bullying involves behaviors that are sexual in nature. Examples of sexualized bullying behaviors include sexting, bullying that involves exposures of private body parts, and verbal bullying involving sexualized language or innuendos.

Anyone who sees an act of bullying, and who then encourages it, is engaging in bullying. This policy applies to all students, school personnel, school volunteers, and school visitors.

All school personnel are required to report alleged violations of this policy to their Supervisor, Division Head, HR or ultimately Head of School as appropriate. All other members of the school community, including students, parents, volunteers and visitors, are encouraged to report any act that may be a violation of this policy. Retaliation against individuals who report such alleged violations is expressly prohibited.

School officials will accept and review all reports of bullying, including anonymous reports. School officials should consider the ages and maturity of the students involved, the type of behaviors, the frequency and/or pattern of behaviors, the context in which the incident occurred, and other relevant circumstances. Consequences may range from positive behavioral interventions up to and including suspension, expulsion, and/or reports to law enforcement officials.

Awty will implement a comprehensive bullying prevention program under which students, employees, parents, and community members together partner to prevent bullying and maintain a safe environment for our students. This program will include the training of school employees and the education of students and parents regarding:

- The definition of and various forms of bullying;
- How bullying occurs in schools;
- How the school supervises students to prevent bullying; and
- How to respond to bullying.

◆ Policy Overview – Reporting and Responding ◆

Once a concern has been expressed about the treatment of a student or an allegation of abuse has been made, steps should be taken immediately to reduce any subsequent risk to the student, to the accused staff member, and to the school. The Awty International School has developed the following policies to encourage reporting, appropriately manage investigations, and standardize sanctioning for inappropriate behaviors.



Reporting and Responding to Suspicious or Inappropriate Behaviors

Because The Awty International School is dedicated to maintaining a zero tolerance for abuse, it is imperative for every member of this school to participate actively in the protection of students. In the event that personnel observe any suspicious or inappropriate behaviors on the part of other personnel, it is their personal responsibility to immediately report their observations. Examples of suspicious or inappropriate behaviors would be policy violations, neglectful supervision, seeking private time with children and youth, taking children and youth off-premises without adhering to procedures, buying unusual gifts for children and youth, poor role modeling, swearing, or making suggestive comments to children and youth.

Inappropriate behaviors or policy violations that relate to interactions with students should be reported to one of the following:

- Immediate supervisor;
 - Your Department Head and/or Division Head;
 - The Head of School;
 - The French Proviseur
 - Submit a specific and verifiable letter of concern to the Head of School. If raising an issue of concern, all employees should exercise care to ensure the accuracy of the information disclosed. If after investigation, any concerns raised are found to be without substance and to have been made for malicious or frivolous reasons, the person raising the concern could be subject to disciplinary action.
1. All reports of suspicious or inappropriate behavior with children and youth will be taken seriously. The Awty International School's procedures will be carefully followed to ensure that the rights of all those involved are protected. All reports will be responded to by the Head of School. It is The Awty International School's role to:
- Immediately report the suspicious or inappropriate behavior to the Head of School
 - Discuss suspicious or inappropriate behavior with the staff involved.
 - Provide the staff with feedback and follow the progressive disciplinary procedure if necessary.
 - Document the steps that were taken.
 - Require that the results of the response are reviewed and approved by administration.

◆ Policy Overview – Reporting and Responding (continued) ◆

- If appropriate, develop a corrective action plan to prevent a reoccurrence.
 - If at any point in gathering information about suspicious or inappropriate behavior a concern arises that there is a possibility of abuse, the state authorities will be contacted and a report filed.
 - If at any point, policy violations with students are confirmed, personnel will be subject to disciplinary action up to and including termination and possible prosecution. Disciplinary action will follow the Progressive Discipline Process.
2. The Awty International School has a progressive discipline system regarding suspicious or inappropriate behaviors or policy violations, which includes:
- Verbal warning.
 - Written warning/Notice of unprofessional conduct.
 - Reassignment.
 - Compulsory leave of absence.
 - Suspension without pay.
 - Termination.
3. The Awty International School has a procedure for responding to allegations of abuse. It is the school's role to:
- Immediately respond to all abuse allegations.
 - Ensure confidentiality to the fullest extent possible.
 - Place alleged perpetrator on compulsory leave of absence, with pay, until the completion of the investigation.
 - Inform the alleged perpetrator he/she is not allowed to have contact with any child until the completion of the investigation.
 - Protect the alleged victim from intimidation, retribution, or further abuse.
 - Notify the proper authorities.
4. The Awty International School systematically reviews incidents to assess the need for training or for revisions to policy and procedures.
5. The Awty International School has a designated spokesperson(s) to respond to media requests. All media correspondence should be directed through the Acting Director of Advancement, Mr. Ronald Jackson. All personnel are required to know who this person is.

◆ Code of Conduct ◆

It is the desire of The Awty International School to provide the highest quality education available to our children. Our commitment as an organization is to create an environment for children that is safe, nurturing, empowering, and which promotes growth and success for the children who learn in our school. To clarify our vision of how this will be accomplished, the Code of Conduct outlines specific expectations of staff and volunteers as we strive to accomplish our mission together.

1. Children will be treated with respect at all times.
2. Children will be treated fairly regardless of race, sex, age, or religion.
3. Staff will not swear or tell off-color jokes.
4. Staff will not discuss with children their sexual encounters or in anyway involve children in their personal problems or issues.
5. Staff will not use or be under the influence of alcohol or illegal drugs in the presence of children.
6. Staff will not have sexually oriented materials, including printed or Internet pornography, in the presence of children.
7. Staff will not have secrets with children.
8. Staff will dress conservatively and avoid wearing provocative and revealing attire including midriffs, tank tops, halter tops, short shorts, or short skirts.
9. Staff will not stare or comment on a child's body.
10. Staff will adhere to uniform standards of affection.
11. Staff will avoid affection that cannot be observed.
12. Staff shall not abuse children in anyway including the following:
 - Physical abuse:* hitting, spanking, shaking, slapping, unnecessary restraints
 - Verbal abuse:* degrade, threaten, cursing
 - Sexual abuse:* inappropriate touch, exposing oneself, sexually oriented conversations
 - Mental abuse:* shaming, humiliation, cruelty
 - Neglect:* withholding food, water, shelter
13. Staff will report concerns or complaints about The Awty International School staff or children to the Head of School.

Any type of abuse will not be tolerated and will result in immediate dismissal from The Awty International School. The Awty International School will fully cooperate with authorities if allegations of abuse are made and investigated.

◆ Extra-Curricular Activities and Field Trips ◆

Extra-curricular activities and field trips present unique risks for the safety of children. Large groups are difficult to monitor, and children may be more likely to act out sexually in a less structured environment. An ill-intentioned adult may try to arrange to meet with a child. It is important to be aware of these risks and take measures to minimize them.

All extra-curricular activities and field trips must be in compliance with The Awty International School system-wide abuse prevention policies. Additionally, all such activities must meet the following guidelines:

1. All extracurricular activities and field trips must be approved by the appropriate Division Head.
2. All overnight extracurricular activities and field trips must be approved by two levels of administration including the appropriate Division Head.
3. All extra extracurricular activities and field trips must include two unrelated Awty International School personnel.
4. Administrators are expected to regularly and randomly observe school extracurricular activities and field trips.
5. Programs are required to provide parents with written information about extracurricular activities relevant to the detection and prevention of child abuse.
6. When transporting children, the following procedures must be observed:
 - Determine the number of staff necessary to adequately supervise children, (e.g., one staff to 6 children).
 - The bus driver should not be assigned as a supervisor for the children.
 - Staff should be randomly seated throughout the bus for easier supervision of children.
 - Children should be seated by age or grade.



◆ Policies for Volunteers ◆

Volunteers make invaluable contributions to our school. They help teachers in the classroom, office administrators in the office, and students in the hallway. Volunteers can be part of the overall risk management effort when they know the rules and expectations of the school.



Volunteers are required to register with the Advancement Department and complete the following:

1. Volunteer Application authorizing the school to perform a criminal background check and Sex Offender Registry check.
2. Training program on abuse prevention
3. Sign an Acknowledgement of Policies statement.
4. Sign a Cooperation with Investigation statement.
5. Remain in line-of-sight of staff during extra-curricular activities or field trips or when working directly with children.

◆ Acknowledgement of Abuse Prevention Policies ◆

I have read and agree to comply with the published policies and rules of The Awty International School as outlined in the School's Abuse Prevention Policy manual. After signing, please return this page to the Human Resources office. Thank you.

Signature of Employee

Date

Printed Name of Employee

Date