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## Safety Handbook—for Students, Staff, Volunteers & Parents

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**Summary:** These guidelines are intended to facilitate a safe and nurturing environment in which children can learn and grow.

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Dear Faculty, Staff Member, Volunteer, and/or Parent,

Welcome to Concordia International School Shanghai!

At Concordia, we take our responsibility to educate and care for children and staff very seriously. These guidelines are intended to facilitate a safe and nurturing environment in which children can learn and grow in a strong educational environment.

The pages of this handbook provide a general overview of procedures and guidelines for Concordia International School Shanghai students, staff members, volunteers, and parents. Our policies are intended to create a safe environment that protects students, community members, and supports the mission of Concordia Shanghai. The following procedures have been adopted and will be strictly enforced.

After you have carefully read this policy manual, please sign and return the agreement form located on the last page.

Sincerely,

Dr. Mary K. Scott  
Head of School



# Concordia Shanghai Safety Policies & Procedures Handbook for Students, Staff, Volunteers & Parents

## Contents:

• Child Protection Policy .....	3
• Harassment, Intimidation, Bullying & Discrimination Policy.....	4
• Supervision of Students Policy .....	5
• Overview of Safety System .....	7
• Abuse.....	8
• Abuse Within the School Setting.....	11
• Reporting Suspicious, Inappropriate, or Abusive Behavior.....	12
• Response to a Report of Abuse or Harassment .....	13
• Steps for Reporting Harassment, Intimidation, Bullying, Discrimination.....	14
• Steps for Reporting Abuse .....	17
• Reporting Abuse Flowchart.....	20
• Procedures Regarding Child Safety .....	21
• Bathroom Supervision and Assistance.....	21
• Gift Giving .....	21
• Intoxicants.....	21
• Tobacco.....	21
• Nudity .....	21
• One-to-One Interactions with Children .....	22
• Parental Contact and Involvement.....	22
• Faculty Parents.....	22
• Counseling.....	22
• Physical Contact .....	23
• Sexually Oriented Conversations.....	23
• Sexually Oriented Materials .....	23
• Internet/Electronic Media .....	23
• Social Media, Online Resources & Employee Websites .....	23
• Socializing.....	26
• Sleeping Arrangements .....	26
• Verbal Interactions.....	26
• Student Support of Events Involving Parents .....	26
• Statement of Acknowledgement & Agreement .....	27

## Child Protection Policy

### **Preamble:**

Child abuse and neglect are of growing concern in schools throughout the world. Child abuse and neglect are violations of a child's human rights and are obstacles to the child's education as well as to their physical, emotional, and spiritual development.

Parents should stay in communication with the school if they have concerns regarding the safety of their children. Typically conversations are initiated with the division counselor(s) who, along with specific training, have access to resources that can support parents in a wide variety of areas.

Schools fill a special institutional role in society as protectors of children. Schools need to ensure that all children in their care are afforded a safe and secure environment in which to grow and develop. Educators, having the opportunity to observe and interact with children over time, are in a unique position to identify children who need help and protection. As such, educators have a professional and ethical obligation to identify children who are in need of help and protection and to take steps to insure that the child and family avail themselves of the services needed to remedy any situation that constitutes child abuse or neglect.

It is the goal of Concordia International School Shanghai to maintain a school environment for all students free from abuse. No Concordia Shanghai employee or volunteer may engage in any activity constituting abuse.

### **Policy:**

All staff employed at Concordia International School Shanghai must report suspected incidences of child abuse or neglect whenever the staff member has reasonable cause to believe that a child has suffered or is at risk of suffering abuse or neglect. Reporting and following up of all suspected incidences of child abuse or neglect will proceed in accordance with administrative regulations respective to this policy. **Chinese law stipulates that schools report to the Public Security Bureau (PSB) any case they find of someone with limited ages (10-18) or no civil capacity (age 10 and under) suffering or seemingly suffering from family violence.** Anyone who fails to report a case that results in serious consequences will bear responsibility, as stipulated in article 34 of the Domestic Violence Law (2016). The laws of the People's Republic of China apply to all people residing in, or visiting, China for the full duration of their stay (no matter how long or short the duration is). The laws apply equally to local and international citizens at all times. Furthermore, cases of suspected child abuse or neglect may be reported to the appropriate employer, to the respective consulate in Shanghai, to the appropriate child protection agency in the home country, and/or to local authorities.

Concordia International School Shanghai endorses the United Nations Convention on the Rights of the Child (UNCRC), of which the host country, China, is a signatory and seeks to be a safe haven for students who may be experiencing abuse or neglect in any aspect of their lives. Concordia International School Shanghai will distribute this policy annually to all parents and applicants, will communicate this policy annually to students, will review the policy with staff annually, and implements hiring practices to insure the safety of children.

First contact in regard to a suspicion of abuse will be the division counselor who will work directly with the division administrator and the Head of School.

In the event that a staff member is reported as an alleged offender, the School will conduct a full investigation following due process as defined in the Safety Handbook.

# **Harassment, Intimidation, Bullying & Discrimination Policy**

## **Preamble**

Concordia International School Shanghai is committed to an environment in which all individuals, students and adults, are treated with respect and dignity. Each individual has the right to an atmosphere, which promotes equality and is free from discriminatory practices and strives to provide students with optimal conditions for learning by maintaining a school environment where everyone is treated with respect and no one is physically or emotionally harmed.

In order to ensure respect and prevent harm, it is a violation of school policy for an individual to be harassed, intimidated, bullied, or discriminated against by others in the school community, at school sponsored events, or when such actions create a substantial disruption to the educational process. The school community includes all students, school employees, school board members, contractors, unpaid volunteers, families, patrons, and other visitors. Individuals will not be harassed because of their race, color, religion, ancestry, national origin, gender, sexual orientation, including gender expression or identity, mental or physical disability, or other distinguishing characteristics.

Any school staff who observes, overhears, or otherwise witnesses harassment, intimidation, or bullying or to whom such actions have been reported must take prompt and appropriate action to stop the harassment and to prevent its reoccurrence.

## **Definition**

Harassment is unwelcome verbal, visual or physical conduct creating an intimidating, offensive, or hostile work environment that interferes with work performance. Examples of harassment include verbal (including slurs, jokes, insults, epithets, gestures or teasing), graphic (including offensive posters, symbols, cartoons, drawings, computer displays, or e-mails) or physical conduct (including physically threatening another, blocking someone's way, etc.) that denigrates or shows hostility or aversion towards an individual because of any protected characteristic. Such conduct constitutes harassment when: 1) it has the purpose or effect of creating an intimidating, hostile, or offensive working environment; or 2) it has the purpose or effect of unreasonably interfering with an individual's work performance; or 3) it otherwise adversely affects an individual's employment opportunities.

A single incident of sufficient severity may constitute harassment. In determining whether or not a specific act or pattern violates this policy, the circumstances surrounding the conduct shall be considered together with the above definitions.

## **Policy**

Concordia is committed to providing an environment that is free from all forms of discrimination and conduct that can be considered harassment, coercion, intimidation, or bullying, including sexual harassment. Concordia encourages the practice of restorative justice and our counseling staff support students using this process. The School prohibits any form of discipline or retaliation for reporting in good faith the incidents of harassment in violation of this policy, pursuing any such claim or cooperating in the investigation of such reports.

All staff members shall intervene when witnessing or receiving reports of harassment, intimidation or bullying. Minor incidents that staff are able to resolve immediately, or incidents that do not meet the definition of harassment, intimidation, or bullying, may require no further action under this procedure.

It is the employee's/student's responsibility to:

1. Conduct himself/herself in a manner that contributes to a positive school environment.
2. Avoid any activity that may be considered discriminatory, intimidating or harassing.
3. Consider informing anyone harassing him or her that the behavior is offensive and unwelcome.
4. All staff are expected to forward any oral and written reports to the appropriate personnel. Reports of discrimination or harassment will be directed to the division Assistant Principal for cases involving students. Reports involving employees will be directed to the Director of HR and/or Assistant Head of School-Personnel. Use of the Harassment Report and Action Plan form is encouraged.
5. If informed he or she is perceived as engaging in discriminatory, intimidating, harassing or unwelcome conduct, to discontinue that conduct immediately.

#### **Employee/Volunteer Procedure**

1. If an employee experiences or witnesses harassment in the workplace, it must be reported immediately to the employee's supervisor. If the supervisor is unavailable or the employee believes it would be inappropriate to contact that person, immediately contact Human Resources or any other member of Concordia's Admin Council. Concerns may be addressed and reports made without fear of reprisal or retaliation.
2. All allegations of harassment will be quickly and discreetly investigated. To the extent possible, the employee's confidentiality and that of any witnesses and the alleged harasser will be protected against unnecessary disclosure.
3. When the investigation is completed, he/she will be informed of the outcome of the investigation.
4. Any supervisor or manager who becomes aware of possible harassment must immediately advise the Assistant Head of School-PA or the Human Resources Dept. so it can be investigated in a timely and confidential manner.
5. Any employee, regardless of title, who knew about the prohibited harassment, but took no action to report or stop it, may be subject to discipline, up to and including termination.
6. Upon completion of the investigation, if necessary, corrective measures will be taken. These measures may include, but are not limited to, training, counseling, warning, suspension, or immediate dismissal. Anyone, regardless of position or title, found through investigation to have engaged in improper behavior, as defined above, will be subject to discipline up to and including discharge.
7. If the investigation is inconclusive, Concordia may still provide counseling or take other appropriate steps.
8. A Harassment Report and Action Plan (form) will be completed and kept on file in the HR Dept. for staff and in the division counselor's office for students following each report.

### **Supervision of Students Policy**

#### Campus hours:

- Between 10 p.m. and 7 a.m. the campus is closed and no one other than an employee with a Concordia ID will be allowed to enter unless authorized by a school administrator.
- Students, families, and their visitors may be on campus on school evenings and on weekends between 7:00 a.m. and 10:00 p.m. by following the sign in procedures and requirements established by the school and available in the Security Policy under the Policies, Procedures & Forms on the Student and Parent Portals of the school website.

- On official holidays and other non-school days, students/families are not allowed on campus unless authorized by a school administrator.

### CCTV Cameras

If a safety or security issue arises, members of the Concordia community should make divisional administrators or the Operations Department [operations@concordiashanghai.org](mailto:operations@concordiashanghai.org) aware of the concern.

CCTV footage from school cameras may be reviewed by school administration to better understand the circumstances related to the concern. Footage is not available for public viewing and members of the Concordia community do not have a right to view CCTV footage. An administrator may, however, choose to use CCTV footage as a tool in addressing a concern if:

- There is an educational opportunity with the student(s).
- The administrator determines that the footage is conclusive and will assist in clarifying a profound disagreement.
- The administrator receives approval from the AHOS-PA to share the video.

### Supervision by Parents: Parents bear primary responsibility for the supervision of their children on school grounds based upon the following conditions:

- Before 7:45 a.m., after dismissal on school days and on weekends, unless the student is participating in a Concordia school-sponsored activity.
  - Elementary aged students must be accompanied by a parent or adult chaperone.
    - ES students may be picked up at the end of the day, or after CCAs, by an adult (parent, grandparent, aunt/uncle, driver, helper) or by a sibling who is in Grade 8 or above.
    - ES staff will remain with students until the last student has been returned to the appropriate chaperone identified above or to the ES Office.
  - Parents may choose to allow MS and HS students to remain on campus afterschool to use the school's facilities for research and group study in an **unsupervised** capacity until 7:00p.m. Open, unsupervised spaces are identified as the PC Lounge, Café, or Commons.
    - After 7:00p.m. students should only be on campus as part of a supervised school activity.
    - MS students who arrive on campus before 7:45 a.m. on school days should report to the PC commons unless they have an appointment with a teacher.
    - **At no time should a student be in a classroom unless a teacher is present or in an athletic/fine arts facility without proper supervision.**
    - If a Concordia community member feels the student is conducting him/herself inappropriately, they may ask the student(s) to leave the campus. The student's name and photo may also be taken and reported to the division administrators.
- Access to school grounds is limited to public outdoor locations: the playground and field and the following indoor open spaces--Phoenix Lounge, Phoenix Café, and Phoenix Commons.
  - The Intermediate Building Gym is available for student use after school on school days until 5:00 p.m./, if not being used for school activities.
  - Practice studios are for MUSIC class-related use only and will remain locked each morning unless a student has requested and received permission by their MUSIC teacher to use the facility. All practice studio sessions must be scheduled with MUSIC teachers within the Fine Arts Department.
  - Use of any other space requires permission through the school facilities reservation system and/or supervision by a Concordia employee

- Activities that pose a significant injury hazard are not allowed. This includes, but is not limited to,
  - The flying of commercial/hobbyist drones and other similar products on/over the school.
  - Hoverboards are also not allowed on campus.
- School guards and/or other Concordia staff may request anyone on campus to stop an activity that they feel is posing a safety concern.

Supervision by Concordia Staff: All employees should participate in ensuring that students conduct themselves in a manner that reflects school's philosophy, policies and procedures.

All employees and volunteers must review, acknowledge, and agree to observe the policies and procedures in the Safety Handbook annually prior to supervising students.

Teachers have responsibilities for on-campus supervision:

- before and after school,
- during lunch, and
- throughout the buildings, including the halls and stairwells, and outdoors.
- At the close of the school day, teachers are to see that all students leave the classroom unless specifically asked to remain and are being supervised by a teacher. When leaving their classroom/office space at the end of the day the employee will lock their door.
- No cash/valuables should be left unsecured in classrooms/office spaces at any time. Cash being collected for a school event must be turned into the Cashier in the Business Office each day by 4:00 p.m.

Schedules will be set up within the divisions to indicate where and when this supervision is to take place. Safety at arrival and dismissal times and during school emergencies is important. All employees should assist in supervision at these crucial times.

Teacher's hours are typically from 7:45 a.m. until 3:45 p.m., plus any activities/CCAs for which they are the supervisor. Homeroom and teachers with first period classes should be available to greet students arriving and talk with parents.

Employees who wish to have their own child in their classroom/office outside of school hours may, provided they observe the following expectations:

1. Assume full responsibility for the child(ren).
2. Do not permit students other than their own child(ren) in the room.
3. Are actively supervising the child(ren) and inform them of where they will be should they need to step away from the room.
4. Will not allow the child(ren) to be anywhere other than the parent's classroom/office or a public area where they have permission to be.

After co-curricular sessions,

- MS/HS students should leave campus unless they are involved in another supervised event or move to an "open, unsupervised space," identified as the PC Lounge, Café, or Commons until 7:00p.m.
  - **At no time should a student be in a classroom unless a teacher is present or in an athletic/fine arts facility without proper supervision.**
  - Employees should ask students to leave the campus if they feel the student is conducting

him/herself inappropriately. The student's name and photo may also be taken and reported to the division administrators.

- ES students should be released to an adult (parent, grandparent, aunt/uncle, driver, helper), a sibling who is in Grade 8 or above, or taken to the ES Office.

#### Off-campus chaperoning:

During off-campus field trips, or school trips chaperones are expected to:

- Follow the procedures set out in the Safety Handbook.
- Monitor for compliance of all school rules and student conduct.
- Ensure that students are properly monitored/supervised during the event/activity.
- Manage medical emergencies and injury care.
- Manage all disciplinary issues according.
- Conduct curfew checks regardless of whether students are staying in a hotel or homestay.

Some group activities away from the School may permit youth to function in small, unsupervised groups for brief time periods. When group activities allow for this type of unsupervised functioning, staff members, faculty, and volunteers should set clear expectations for students concerning times to meet and "check-in" with staff members or workers in charge of the activity.

School sponsored trips will have male and female chaperones when both girls and boys are on the trip and at least two chaperones for overnight trips, unless approved by the division principal.

## **Overview of the Concordia Shanghai Safety System**

Because we care for children and desire to protect them, Concordia International School Shanghai (herein referred to as Concordia Shanghai or the School) requires all faculty and staff members to complete the following safety steps before employment begins.

### **STEP ONE: Screening Process**

Faculty and staff members are required to complete the entire screening process. The School requires volunteers who act in a teaching or supervisory role with students to complete steps two through four:

1. complete an Employment Application
2. provide references to be checked
3. complete a Criminal Background Check- Concordia Shanghai requires that all faculty, staff members, and volunteers who act in a teaching or supervisory role with students undergo a criminal background check. Depending upon position, differing levels or intensity of background check may be required.

### **STEP TWO: Sexual Abuse Awareness Training**

Concordia Shanghai policies and procedures require that faculty, staff members, and volunteers avoid abusive behavior of any kind. Faculty, staff members, and volunteers are required to report any policy violations to a supervisor or a member of the Concordia Admin Council.

Faculty, staff members, and volunteers who act in a teaching or supervisory role with students should have a basic understanding of the characteristics of sexual abusers and their behaviors in 'grooming' a child for sexual abuse. Grooming is the process used by an abuser to select a child, win the child's trust (and the trust of the child's parent or 'gatekeeper'), manipulate the child into sexual activity and keep the child from disclosing the abuse.



To equip the School faculty, staff members, and volunteers with information necessary to protect a child from sexual abuse, Concordia Shanghai requires all faculty, staff members, and volunteers to complete Sexual Abuse Awareness Training provided live or online through Abuse Prevention Systems ([www.AbusePreventionSystems.com](http://www.AbusePreventionSystems.com)) or MinistrySafe ([www.MinistrySafe.com](http://www.MinistrySafe.com)). This training will be renewed every 2 years.

Annually students receive age-appropriate information on the recognition and prevention of abuse, harassment, and intimidation on appropriate occasions and at student orientation sessions. The information will include the Abuse and Harassment Report & Action Plan forms.

### **STEP THREE: Policies & Procedures**

Faculty, staff members, and volunteers who act in a teaching or supervisory role with students are required to annually review the policies contained in this manual and sign the last page indicating he or she has read and understood the material, and agrees to comply with policy requirements.

Concordia Shanghai will foster a climate of “freedom to tell” with the recognition that abuse could take place at the School.

## **Abuse**

### **What constitutes abuse or neglect?**

As of March 2016 Chinese law mandates schools to report to the Public Security Bureau (PSB) any case or suspected case of child abuse or neglect. In keeping with practices from a variety of countries, Concordia recognizes four major types of maltreatment: neglect, physical abuse, sexual abuse, and emotional abuse. Although any of the forms of child maltreatment may be found separately, they often occur in combination.

Chinese law defines these types of abuse as follows:

- Neglect—getting little or no attention from parents.
- Physical Abuse—contact intended to cause feelings of pain, injury, or suffering. Abuse includes family discipline justified as, “Beating you is for your own good.”
- Sexual Abuse—forcing a child into having intercourse with someone against his or her will.
- Emotional Abuse—verbal abuse and constant criticism through intimidation and manipulation.

Child protection standards as defined by Concordia encompass all cultures as well as Chinese and international law. Concordia acknowledges that although many families come from different cultural backgrounds, with varying disciplinary practices, maltreatment of a child is never justified. When given reasonable cause to believe that these rights are violated, Concordia will seek all available resources to restore those rights. Therefore, we define abuse and neglect as follows.

### **Neglect:**

*Definition:* Neglect is failure to provide for a child's basic needs. These situations do not always mean a child is intentionally neglected. Sometimes cultural values, the standards of care in the community, and poverty may be contributing factors, indicating the family is in need of information or assistance from the school. When a family fails to use information and resources, and the child's health or safety is at risk, then intervention may be required. Neglect may be:

- Physical (e.g., failure to provide necessary food or shelter, or lack of appropriate supervision—this would include failure to provide proper adult guardianship such as leaving children unsupervised at home for any extended period of time.\*
- Medical (e.g., failure to provide necessary medical or mental health treatment)

- Educational (e.g., failure to educate a child or attend to special education needs)
- Emotional (e.g., inattention to a child's emotional needs, failure to provide psychological care, or permitting the child to use alcohol or other drugs, specific examples may include verbal humiliation, refusing to acknowledge presence of child invasion of privacy for no specific reason, violent threats, a pattern of actions that show contempt)

*Indicators of neglect:*

- Unkempt appearance
- Often hungry
- Low academic performance
- An unwillingness to go home
- Depression
- Complaints of extended parental absence\*

\* Concordia Shanghai requires one parent be a full-time resident of Shanghai. Should parents/ guardian leave the country for any reason, the responsibility for informing the school of all appropriate contact details lies with the parent or guardian. A form allowing temporary changes of guardian is available from the School and is to be completed prior to parents/guardians leaving the country.

**Physical Abuse**

*Definition:* Physical abuse is inflicting injury on a child by other than accidental means or creating a substantial risk of physical harm to a child's bodily functioning. It also includes committing acts that are cruel or inhumane regardless of observable injury. Such acts may include, but are not limited to instances of extreme discipline demonstrating a disregard of a child's pain and/or mental suffering. Physical abuse is also assaulting or criminally mistreating a child, engaging in actions or omissions resulting in injury, or creating a substantial risk to the physical or mental health or development of a child. Failure to take reasonable steps to prevent the occurrence of any of the above would also fall under the category of physical abuse.

*Indicators of physical abuse:*

- Unexplained bruises and welts on any part of the body
- Bruises of different sages (various colors)
- Injuries reflecting shape of article used (electric cord, belt buckle, paddle, hand)
- Injuries that regular appear after absence or vacation
- Unexplained burns, especially to soles, palms, back or buttocks
- Burns with a pattern from an electric burner, iron or cigarette
- Rope burns on arms, legs, neck or torso
- Injuries inconsistent with information offered by the child
- Immersion burn with distinct boundary line
- Unexplained laceration, abrasions or fractures

**Sexual Abuse**

*Definition:* Undesired sexual behavior by one person upon another. This includes both contact and non-contact forms. Contact action involves intentionally touching (either directly or through clothing) the genitals, anus, or breasts of a child other than for hygiene or childcare purposes or forcing the child to touch the adult in this manner. Non-contact sexual abuse includes making the child listen to or engage in inappropriate sexual talk or view sexually explicit materials.

*Indicators of sexual abuse:*

- Sexual knowledge, behavior, or use of language not appropriate to age level
- Unusual interpersonal relationship patterns
- Venereal disease in a child of any age
- Evidence of physical trauma or bleeding to the oral, genital, or anal areas
- Difficulty in walking or sitting
- Refusing to change into PE clothes or fear of bathrooms
- Running away from home and not giving any specific complaint
- Not wanting to be alone with an individual
- Pregnancy, especially at a young age
- Extremely protective parents

**Emotional Abuse**

*Definition:* Any pattern of behavior that impairs the child's emotional development, sense of self-worth, or self esteem such as constant criticism, threats, verbal rejection, name-calling, insults, bullying or put-downs on a regular basis. The non-verbal patterns of behavior can include isolation, ignoring, or rejection on a regular basis.

*Indicators of emotional abuse:*

- Speech disorders
- Delayed physical development
- Substance abuse
- Asthma or severe allergies
- Sucking, rocking, biting or head banging
- Antisocial or destructive behaviors
- Sleep disorders
- Inhibition of play
- Passive or aggressive behaviors
- Developmental delay in academics
- Delay in fine or gross motor skills

The severity of an indicator or statements by the child as to the non-accidental nature of the injury may indicate possible abuse. Staff members, as a guideline for reporting, should use these indicators of abuse and neglect. It is not necessary to know the details of the possible abuse or to be certain whether or not an indicator means that abuse has taken place in order to report. A report should be made when a staff member has reasonable cause to believe that a child has suffered abuse or neglect. Reasonable cause/suspicion exists when it is objectively reasonable for a person to entertain a suspicion based upon facts that could cause a reasonable person in a like position, drawing when appropriate on his or her training and experience, to suspect child abuse.

**Abuse Within the School Setting**

Abuse, within the Concordia setting, is described as the inappropriate behavior of an adult toward a Concordia Shanghai student, or by one student to another, particularly where there is a difference in power based on age or physical/emotional capability. The administrators of the respective divisions

have the responsibility for addressing inappropriate conduct that may occur between students in accordance with Concordia Shanghai's Student Policies.

### **PREVENTION OF STUDENT ABUSE**

1. Concordia Shanghai will not hire staff with a record of abuse. Background checks will be part of the hiring process for employees and volunteers who act in a teaching or supervisory role with students. Applicants for Concordia Shanghai positions will agree in writing with the terms of this policy as part of the contracting process.
2. Abuse prevention and awareness training is mandatory for School faculty, staff, and volunteers who act in a teaching or supervisory role with students
3. Concordia Shanghai will develop and maintain guidelines for faculty, staff, and volunteers who act in a teaching or supervisory role with students to address the prevention, reporting, and investigation of student abuse.
4. Concordia Shanghai provides opportunities within the curriculum for students to learn age appropriate ways to identify, avoid, and respond to areas such as bullying, personal safety, physical abuse, manipulation, grooming, online safety, healthy sexual behavior, neglect and negligent behavior, self-harm, staying safe away from home, and commercial exploitation.

### **ABUSE TOLERANCE**

Concordia Shanghai has a **zero tolerance for abuse** in school programs and activities. It is the responsibility of students, faculty and staff members, and volunteers at the School to act in the best interest of all children with which they interact.

In the event that faculty, staff members, or volunteers observe any inappropriate behaviors (i.e. policy violations, neglectful supervision, poor role-modeling, etc.) or suspected abuse (physical, emotional, or sexual) it is their responsibility to immediately report the information to an immediate supervisor or a member of the Admin Council, including, the Principals, Assistant Principals, Assistant Heads of School, or the Head of School.

It is a violation of Concordia Shanghai's Student Safety policies if a faculty, staff member and/or volunteer knows of misconduct, but takes no action to intervene on behalf of the student(s).

### **PEER-TO-PEER ABUSE**

Staff members and volunteer have an obligation to report peer-to-peer child abuse. Approximately 1/3 of all reported child sexual abuse occurs at the hands of other children or students. Whether sexual interaction between children constitutes 'sexual abuse' depends on the existence of an aggressor, the age difference between the children, and whether there is an imbalance of power between the parties, including physical or intellectual disabilities. **If you have concern that an interaction between students may constitute sexual abuse, immediately report the interaction to a school supervisor or administrator.**

#### **Peer-to peer sexual abuse risk is highest:**

1. Anywhere less easily seen.
2. Any time students are unclothed or changing clothes, for any reason.

Due to this risk, faculty, staff members and volunteers will be aware of locations in the School's facilities, as well as practice and competition locations, where this risk is higher, including restrooms, changing areas, locker rooms and areas less easily seen or supervised. While not practical to constantly monitor these areas, there will be monitoring by School personnel.

## **Reporting Suspicious, Inappropriate or Abusive Behavior**

All members of the Concordia community share collective responsibility for the safety of Concordia Shanghai students. Leadership responsibilities in regard to student safety and duty of care rest with the Admin Council made up of the Head of School, Assistant Heads of School, Division Principals and Assistant Principals. Concordia Shanghai supports and encourages a culture of communication related to abuse or suspected abuse of children.

Because sexual abusers 'groom' children for abuse, it is possible a staff member or volunteer may witness behavior intended to 'groom' a child for sexual abuse. Concordia Shanghai staff members and volunteers must be aware of their individual responsibility to report any questionable circumstance, observation, act, omission, or situation that is a violation of these policies or if you see or suspect inappropriate interaction with or between children, including 'grooming' behavior. This includes partial or inconclusive information concerning behavior, which may or may not be blameless.

Reasonable suspicion is described as a person being reasonably objective to entertain suspicion, based upon facts that could cause a similar person of similar experience and training to suspect abuse of a student. No person making a report in good faith will be penalized by Concordia Shanghai for making the report.

Staff members and volunteers are required to verbally report an incident to supervisory staff as soon as possible after the incident. Staff members and volunteers should share their questions, concerns, suggestions or complaints with the person who can address them properly. In most cases this will be your immediate supervisor. If you are uncomfortable discussing this matter with your immediate supervisor, you may go directly to the Head of School. If the concern is regarding the Head of School the report should be sent to the Governance Committee of the Board.

### **Response to a Report of Abuse or Harassment**

Any report of inappropriate behaviors or suspicions of abuse or harassment will be taken seriously. After receiving a report, the supervisor will consult, as soon as reasonably possible, with the Head of School who will speak with the person or volunteer in order to get detailed information about the entire conversation.

#### **ACTING IN GOOD FAITH**

Anyone filing a complaint concerning a violation or suspected violation of Concordia Shanghai policy must be acting in good faith and have reasonable grounds for believing that a violation of policy has occurred. Anyone acting in good faith will not be subject to adverse employment consequences as a result of raising a concern. Any allegations that prove to be unsubstantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

#### **CONFIDENTIALITY**

Violations or suspected violations may be submitted on a confidential basis or may be submitted anonymously. Complaints will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. All reports of suspected or disclosed abuse and any actions taken by the school are securely archived, regardless of the conclusions reached. For staff these records are

maintained by HR and the division counselor keeps records on students.

### **HANDLING REPORTED VIOLATIONS**

The supervisor or administrator will acknowledge receipt of the reported suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

### **INVESTIGATION**

Other than as required to investigate allegations or fulfill legal obligations, care must be given to protect the alleged victim(s), the alleged perpetrator(s), and the reporter by restricting information access to those who need and have the authority to know.

### **ENFORCEMENT OF POLICIES**

Concordia Shanghai staff members and volunteers who supervise other staff members or volunteers are charged with the diligent enforcement of all School policies. Violations of these policies are grounds for immediate dismissal, disciplinary action, or reassignment from positions for both volunteers and staff members. Final decisions related to policy violations will be the responsibility of the Head of School.

### **CONSEQUENCES OF VIOLATION**

Failure to report a prohibited act to supervisory personnel as designated in this policy is a violation of this policy and grounds for termination of employment of any employee. Volunteers who fail to report a prohibited act may be restricted from participation in any activities involving children, students or vulnerable populations at Concordia Shanghai.

Any person accused of committing a prohibited act or any act considered by the School to be harmful to a child will be immediately suspended from all child interaction and school-related activities while the school administration quickly and thoroughly investigate the situation. This suspension will continue during any investigation by law enforcement or child protective agencies. Concordia Shanghai employees and volunteers who violate any of these regulations will at a minimum be officially reprimanded in writing. This will take place in a meeting involving the Head of School, or a representative of the Admin Council. The first offense may lead to immediate termination depending on the circumstances.

If the investigation indicates that reasonable grounds do not exist to support allegations of abuse, a written statement to that effect will be given by the Head of School to the Concordia Shanghai employee in question.

If inappropriate behavior did exist but does not constitute abuse, the perpetrator will be subject to appropriate disciplinary consequences. The School Administration will determine suitable disciplinary action.

If the investigation indicates that reasonable grounds do exist to believe that abuse has occurred, the Head of School will submit a copy of the report to the Board President.

Any person found to have committed a prohibited act may be prohibited from future participation as a staff member or volunteer in all activities and programming that involves children, students or

vulnerable populations at Concordia Shanghai. If the person is a staff member or employee, such conduct may also result in termination of employment from Concordia International School Shanghai.

A report of inappropriate behaviors or suspicions of abuse may be followed up on with the respective consulate in Shanghai, to the appropriate child protection agency in the home country, and/or to local authorities including the Shanghai Police Security Bureau as required by law.

### **ON GOING TRAINING OF FACULTY AND STAFF**

The school will design and provide appropriate in-service training annually for faculty and Academic Support staff, which will include:

- The process the school will follow in abuse investigation, including staff roles and responsibilities.
- Warning signs of abuse and neglect
- Use of the Report and Action Plan form
- The important role teachers will need to play in assisting the child's recovery and future development
- How to monitor common areas

For all staff and volunteers, the online Sexual Abuse Awareness Training is required every two (2) years.

## **Steps for Reporting Harassment, Intimidation, Bullying, Discrimination**

### **STEP 1: FILLING OUT A HARASSMENT REPORT & ACTION PLAN FORM**

In order to protect a reporter from retaliation, the Harassment Report & Action Plan may be filed anonymously, confidentially, or the reporter may choose to disclose his or her identity (non-confidential).

#### Status of Reporter

a. Anonymous

Individuals may file a report without revealing their identity. No disciplinary action will be taken against an alleged aggressor based solely on an anonymous report. Divisions will identify drop boxes and develop other methods for receiving anonymous, unsigned reports. Any staff member who receives an anonymous report should pass it on to the division assistant principal. Possible responses to an anonymous report include enhanced monitoring of specific locations at certain times of day or increased monitoring of specific students or staff. *(Example: An unsigned Incident Reporting Form dropped on a teacher's desk led to the increased monitoring of the boys' locker room in 5th period.)*

b. Confidential

Individuals may ask that their identities be kept secret from the accused and other students. Like anonymous reports, no disciplinary action will be taken against an alleged aggressor based solely on a confidential report. *(Example: A student tells a playground supervisor about a classmate being bullied but asks that nobody know who reported the incident. The supervisor says, "I won't be able to punish the bullies unless you or someone else who saw it is willing to let me use their names, but I can start hanging out near the basketball court, if that would help.")*

c. Non-confidential

Individuals may agree to file a report non-confidentially. Complainants agreeing to make their complaint non-confidential will be informed that due process requirements may require that the district release all of the information that it has regarding the complaint to

any individuals involved in the incident, but that even then, information will still be restricted to those with a need to know, both during and after the investigation. The district will, however, fully implement the anti-retaliation provision of this policy and procedure to protect complainants and witnesses.

## **STEP 2: RECEIVING A HARRASSMENT REPORT & ACTION PLAN FORM**

All staff are responsible for receiving oral and written reports. Whenever possible staff who initially receive an oral or written report of harassment, intimidation, or bullying shall attempt to resolve the incident immediately. If the incident is resolved to the satisfaction of the parties involved, or if the incident does not meet the definition of harassment, intimidation, bullying, or discrimination, no further action may be necessary under this procedure.

All reports of unresolved, severe, or persistent harassment, intimidation, bullying, or discrimination will be recorded on a Harassment Reporting & Action Plan form and submitted to the principal or designee, unless the designee is the subject of the complaint.

## **STEP 3: INVESTIGATIONS OF UNRESOLVED, SEVERE, OR PERSISTENT HARASSMENT, INTIMIDATION, BULLYING AND DISCRIMINATION**

All reports of unresolved, severe, or persistent harassment, intimidation, bullying, or discrimination will be investigated with reasonable promptness. Any student may have a trusted adult with them throughout the report and investigation process.

- a. Upon receipt of the Harassment Reporting & Action Plan form the school designee will begin the investigation. If there is potential for clear and immediate physical harm to the complainant, the school will immediately contact law enforcement and inform the parent/guardian if the complainant is a student.
- b. During the course of the investigation, the school will take reasonable measures to ensure that no further incidents of harassment, intimidation, bullying or discrimination occur between the complainant and the alleged aggressor. If necessary, the school will implement a safety plan for the student(s) involved. The plan may include changing seating arrangements for the complainant and/or the alleged aggressor in the classroom, at lunch, or on the bus; identifying a staff member who will act as a safe person for the complainant; altering the alleged aggressor's schedule and access to the complainant, and other measures.
- c. Within two (2) school days after receiving the Harassment Reporting & Action Plan form, the school designee will notify the accused and, when a student is involved, the families of the students that a complaint was received and direct the families to the school's policy on harassment, intimidation, bullying and discrimination and the procedure defined in the Safety Handbook.
- d. In rare cases, where after consultation with a the student and appropriate staff (such as a psychologist, counselor, or social worker) the school has evidence that it would threaten the health and safety of the complainant or the alleged aggressor to involve his or her parent/guardian, the school may initially refrain from contacting the parent/guardian in its investigation of harassment, intimidation, and bullying. If professional school personnel suspect that a student is subject to abuse and neglect, they must follow the school's policy for reporting suspected cases of abuse.
- e. The investigation shall include, at a minimum:
  - An interview with the complainant.
  - An interview with the alleged aggressor.



- A review of any previous complaints involving either the complainant or the alleged aggressor.
  - Interviews with other students or staff members who may have knowledge of the alleged incident.
- f. The school designee may determine that other steps must be taken before the investigation is complete.
- g. The investigation will be completed as soon as practicable but generally no later than five (5) school days from the initial complaint or report. If more time is needed to complete an investigation, the school will provide the parent/guardian and/or the targeted individual with weekly updates.
- h. No later than two (2) school days after the investigation has been completed and filed, the school designee shall respond in writing or in person to the parent/guardian of the complainant and the alleged aggressor stating:
- The results of the investigation.
  - Whether the allegations were found to be factual.
  - Whether there was a violation of policy.
  - The process for the complainant to file an appeal if the complainant disagrees with results.

Because student records are confidential, the school designee may not be able to report specific information to the targeted student's parent/guardian about any disciplinary action taken unless it involves a directive that the targeted student must be aware of in order to report violations.

If professional school personnel suspect that a student is subject to abuse or neglect, as mandatory reporters they must follow school policy for reporting suspected cases of abuse to the Head of School.

#### **STEP 4: CORRECTIVE MEASURES FOR THE AGGRESSOR**

After completion of the investigation, the school designee will institute any corrective measures necessary. Corrective measures will be instituted as quickly as possible, but in no event more than five (5) school days after contact has been made to the families or guardians regarding the outcome of the investigation.

If in an investigation a principal or principal's designee found that a student knowingly made a false allegation of harassment, intimidation, or bullying, that student may be subject to corrective measures, including discipline.

#### **STEP 5: TARGETED STUDENT'S RIGHT TO APPEAL**

1. If the complainant or parent/guardian is dissatisfied with the results of the investigation, they may appeal to the Head of School (HOS) or his or her designee by filing a written notice of appeal within five (5) school days of receiving the written decision. The HOS or his or her designee will review the investigative report and issue a written decision on the merits of the appeal within five (5) school days of receiving the notice of appeal. The HOS's decision will be the final school decision.

#### **STEP 6: DISCIPLINE/CORRECTIVE ACTION**

The school will take prompt and equitable corrective measures within its authority on findings of harassment, intimidation, or bullying. Depending on the severity of the conduct, corrective measures may include counseling, education, discipline, and/or referral to law enforcement.

Corrective measures for a student who commits an act of harassment, intimidation, or bullying will be varied and graded according to the nature of the behavior, the developmental age of the student, or the student's history of problem behaviors and performance.

If staff have been found to be in violation of this policy and procedure, school districts may impose employment disciplinary action, up to and including termination. Contractor violations of this policy may include the loss of contracts.

#### **STEP 7: SUPPORT FOR THE TARGETED STUDENT**

Persons found to have been subjected to harassment, intimidation, bullying or discrimination will have appropriate school support services made available to them, and the adverse impact of the harassment on the complainant shall be addressed and remedied as appropriate.

No school employee, student, or volunteer may engage in reprisal or retaliation against a targeted student, witness, or other person who brings forward information about an alleged act of harassment, intimidation, bullying or discrimination. Retaliation is prohibited and will result in appropriate discipline.

#### **WHEN A CHILD HAS BEEN VICTIMIZED**

If a staff member or volunteer has knowledge or a suspicion that a child is a victim of abuse or other maltreatment, the information will be reported to supervisory staff and the appropriate authorities as outlined below.

#### **Steps for Reporting Abuse**

Where there is cause to suspect an incident of child abuse or neglect, it is the responsibility of the staff members to report their suspicions to the counselor responsible for that child, or if the counselor is not available, to the principal. In all cases, the principal will be notified and then will inform the Head of School. As a result of changes to the PRC laws relating to domestic violence and abuse, the Head of School or his or her assignee may determine that the abuse finding must be reported to the local Public Security Bureau (local PSB). The local PSB may open a file and proceed to conduct its own investigation. In those cases, the School's investigatory steps set forth below may be suspended, delayed or expanded. In the absence of a notice from the Head of School to proceed otherwise, the following steps will be taken:

#### **STEP 1**

The counselor will take initial steps to gather information regarding the reported incident. In all cases, follow up activities will be conducted in a manner that ensures that information is documented factually and that strict confidentiality is maintained. These steps will typically include the following:

1. Discussion between the child and counselor in order to gain more information.
2. Report to principal.
3. Observations of the child by the teacher, counselor, nurse and/or administrator.
4. Interview staff as necessary and document information relative to the case.
5. Consult with school personnel to review the child's history in the school.
6. Report status of case to the Head of School.
7. A consultation with the school attorney or other legal services if deemed appropriate.
8. Determine the course of follow-up actions.

In the event that the abuse or neglect allegation involves a staff or faculty member at Concordia, the administration will follow policy to ensure ethical professional behavior.

## **STEP 2**

Based on acquired information, a plan of action will be developed to assist the child.

Actions may include any/all of the following:

- Meeting with the family to present the school's concern and set action plan
- School provided guidance, counseling, and prevention education
- Referral of the student and family to external professional counseling.
- Report to the Public Security Bureau (PSB)
- Notification to the employer and/or consultation with the consulate of the country of the involved family.
- No further action required
- Expulsion from school if at an impasse

An Abuse or Harassment Report and Action Plan (forms) will be completed and kept on file in the HR Dept. for staff and in the division counselor's office for students following each report.

## **FOLLOW-UP AND CONTINUING SUPPORT**

Subsequent to a reported and/or substantiated case of child abuse or neglect:

- The counselor will maintain contact with the child and family to provide support and guidance as appropriate.
- The counselor will provide the child's teachers and the principal with ongoing support
- The counselor will provide resource materials and strategies for teacher use.
- The counselor will maintain contact with outside therapists to update the progress of the child in school.

All documentation of the investigation will be kept in the child's school confidential records file. Records sent to schools to which the student may transfer will be flagged to let receiving schools know there is a confidential file for the child. Concordia Shanghai and will make every attempt to share this information to protect the child.

## **RESOURCES**

- Convention on the Rights of the Child: <http://www.everychild.ca/uncrc> and [http://www.unicef.org/rightsite/484\\_540.htm](http://www.unicef.org/rightsite/484_540.htm)
- [Child Friendly Summary](#) of the UNCRC and [Flyer](#)
- State of Washington Office of the Superintendent: School safety Center <http://www.k12.wa.us/safetycenter/BullyingHarassment/default.aspx> ; this site offers parent, curricular, and toolkit resources
- Shanghai International Mental Health Association (SIMHA) <http://s-imha.com/> -hopes to have information about child safety in the near future
- Lifeline-a good resource for confidential telephone counseling. Call 6279-8990. A place that talks to people in distress who don't know where to turn.
- Shanghai Mental Health Centre (SIMHA) runs a similar Chinese language helpline. Call 021 123205 (8AM-10PM daily)
- Save the Children Organization [ShanghaiOffice.China@savethechildren.org](mailto:ShanghaiOffice.China@savethechildren.org); tel: 6075-2050; <https://china.savethechildren.net>

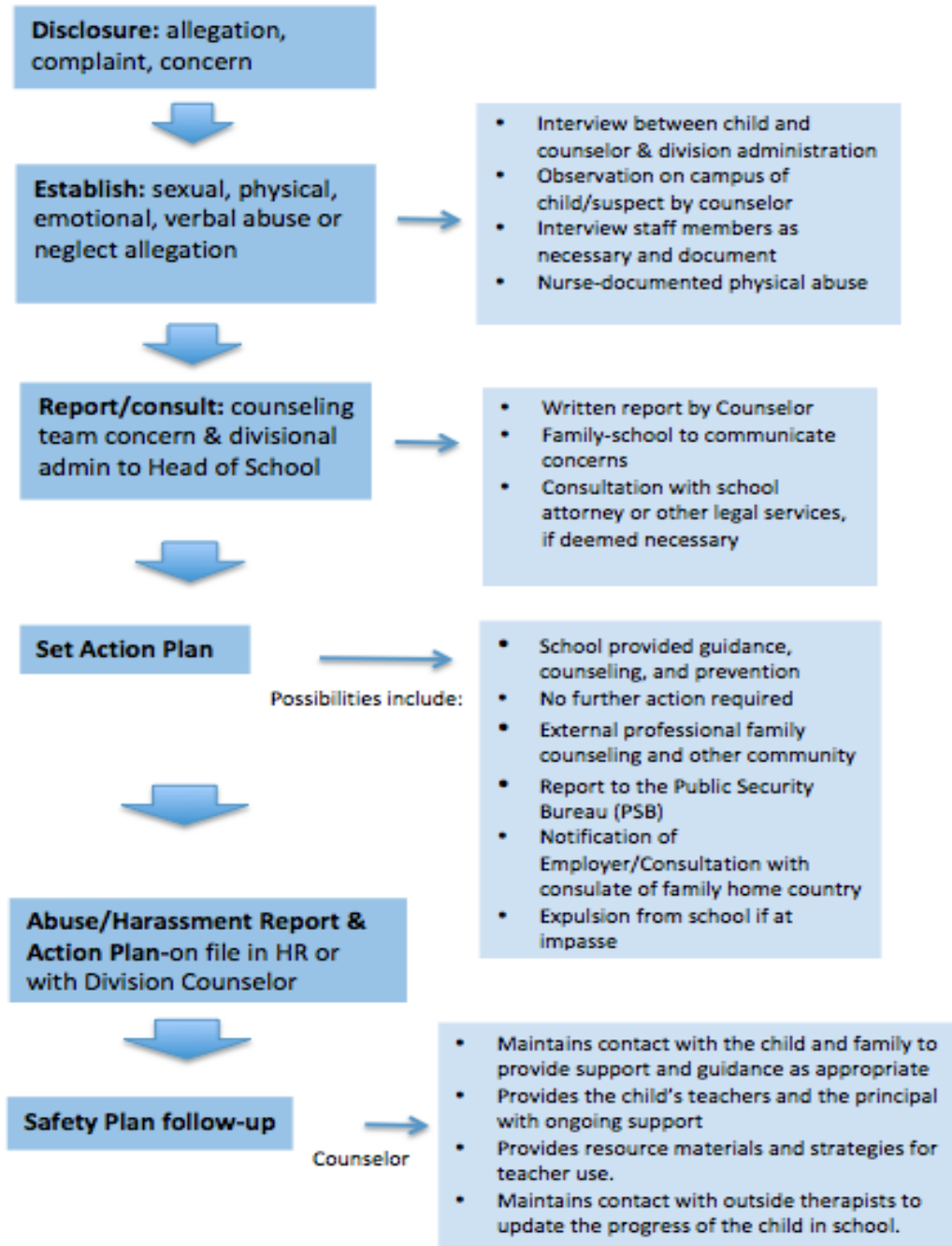
- China Charities Aid Foundation for Children [ccaafc@ccaafc.org.cn](mailto:ccaafc@ccaafc.org.cn); tel: 010 51660112 400 or Child aid: 400-006-9958
- A Family Resource Guide on International Parental Kidnapping, US Department of Justice; <http://www.ojjdp.gov/Publications/PubAbstract.asp?pubi=237060&ti=&si=&kw=kidnapping&strItem=Publications&strSingleItem=&p=search&PreviousPage=SearchResults>
- Counselors maintain resources for counseling services.

**ALSO SEE**

- Admin Policy (AP): Safety Handbook
- AP: Guardianship
- Form (F): Abuse Report & Action Plan
- Form (F): Harassment Report & Action Plan
- F: Counselor: Abuse Action Form
- F: Letter to Parents (English, Mandarin, Korean)
- F: Parent Out of Shanghai-temporary guardianship

## REPORTING ABUSE FLOWCHART

### Action at a Glance



## Procedures Regarding Child Safety

### **BATHROOM SUPERVISION AND ASSISTANCE GUIDELINE**

Staff members, faculty, and volunteers should avoid taking children to the restroom. Elementary students may be accompanied to the restroom for supervision and assistance when needed. (However, the student should receive the minimum amount of assistance needed based upon their individual capabilities.) If a staff member, faculty, or volunteer must go to the restroom to check up on an individual child they should:

- 1) Go to the exterior bathroom door, knock, and ask if the child needs assistance.
- 2) If the child requires assistance, the worker should leave the exterior bathroom door open when entering the bathroom area and try to verbally assist the child in completing their activities while the child remains behind the door of the bathroom stall.
- 3) If the child requires further assistance (this would typically be with young children) the adult must make choices which are reasonable and prudent, i.e. the stall door should remain open with the adult outside the stall and any physical contact limited to areas of the child's body that would not be covered by a bathing suit.

### **GIFT GIVING**

Staff members, faculty, and volunteers are prohibited from providing special gifts to any individual student. Special occasions or special accomplishments should receive group acknowledgement and can easily be rewarded with group recognition (i.e., give mention during announcements; have the entire class sing Happy Birthday, etc.) Any requests for variance from this policy must be addressed to the Principal or Head of School. When a student is fundraising, it would not be appropriate to give a gift in secret and the gift should not suggest that you are trying to build a special relationship with the child as these could be viewed as grooming behavior. It would be preferred that the gift be given directly to the organization sponsoring the fundraising/mission trip rather than directly to the student and the gift may be given anonymously. If you are uncertain, you may wish to discuss it with the AHOS-PA.

### **INTOXICANTS**

Staff members, faculty, and volunteers are prohibited from the use, possession, or being under the influence of alcohol or any illegal drugs while in the facility, during a school activity or while working with students at Concordia Shanghai. Any exception in regard to alcohol requires special approval from the Head of School. Staff members, faculty, and volunteers are prohibited from providing alcohol or illegal drugs to students.

### **TOBACCO**

Concordia Shanghai is a tobacco-free facility. The School requires staff members, faculty, and volunteers to refrain from the use or possession of tobacco products in the facility, and while in the presence of children and students or their parents. Concordia Shanghai staff members, faculty, and volunteers are prohibited from providing tobacco products to students.

### **NUDITY**

Staff members, faculty, and volunteers at Concordia Shanghai should never be nude in the presence of students in their care.

## **ONE-TO-ONE INTERACTIONS WITH CHILDREN AND STUDENTS**

Concordia Shanghai recognizes that meeting the educational needs of students may occasionally require that staff members and faculty interact with them on an individual basis. The employee is expected to be prudent and maintain good boundaries. Inappropriate behavior could result in immediate dismissal. Workers should observe the following guidelines when interacting with students:

### **Individual Meetings**

Staff members, faculty, and volunteers should conduct one-to-one meetings with an individual student at a time when others are present and/or where interactions can be easily observed. There will be no one-to-one meetings between a staff member or a faculty and a student behind closed doors unless the conditions from the previous sentence are met. If a circumstance arises where these conditions are not met, the staff member or faculty will notify the appropriate Principal or the Head of School immediately before or after the meeting.

### **Transportation**

Staff members and faculty may from time to time be in a position to provide transportation for students. The following guidelines should be strictly observed when workers are involved in the transportation of students:

- 1) Students should never be transported without parental permission.
- 2) Students should be transported directly to their destination. No unauthorized stops should be made.
- 3) Staff members, faculty, and volunteers should avoid physical contact with students while in vehicles.
- 4) No cell phones may be used by the driver while providing transportation for students.
- 5) Students should not use a vehicle belonging to a staff member, faculty, or volunteer.

## **PARENTAL CONTACT AND INVOLVEMENT**

Parents who leave their students in the care of Concordia Shanghai staff members, faculty, or volunteers for services and activities will be contacted if their child/student becomes ill, injured, or has a severe disciplinary problem while participating in school activities.

Parents are encouraged to be involved at Concordia Shanghai in ways that are appropriate.

## **FACULTY PARENTS**

If a Concordia Shanghai student other than a School employee's own child or legal guardian is living in an employee's home, the Assistant Head of School-AP should be notified.

## **COUNSELING**

Concordia Shanghai employees should be very cautious concerning counseling students about sensitive issues. The question should be asked: Is that staff member the best person to be counseling that student?

The Assistant Head of School-PC and the parent (s) should be aware of any counseling that is going on regarding abuse.

Concordia Shanghai employees should never agree to or suggest that confidential discussions be kept from school officials or parents when involving potential abuse.

## **PHYSICAL CONTACT**

Concordia Shanghai is committed to protecting the students in our care. The School has implemented a physical contact policy that will promote a positive, nurturing environment while protecting our students. Physical contact in any form should not give even the appearance of wrongdoing. The personal behavior of Concordia Shanghai staff members, faculty, and volunteers must foster trust at all times – personal conduct must be above reproach. The following guidelines are to be carefully followed by anyone working in School programs:

1. Hugging, pats on the back and other forms of appropriate physical affection between staff or faculty and students are important for student's development, and are generally suitable in the school setting.
2. Physical affection should be appropriate to the student's age. Inappropriate touching and inappropriate displays of affection are forbidden. Any inappropriate touching and inappropriate displays of affection should be immediately reported to the Head of School or the respective Principal.
3. Physical contact and affection should only be given when in the presence of other children or School staff, faculty, and volunteers. It is much less likely that touches will be inappropriate or misinterpreted as such when more than two individuals are present and the touch is open to observation.
4. Do not force any physical contact, touch or affection upon a reluctant child. A child's preference not to be touched must be respected.

## **SEXUALLY ORIENTED CONVERSATIONS**

Staff members, faculty, and volunteers are prohibited from engaging in any sexually oriented conversations with students. However, it is expected that from time to time staff may be called upon to address students regarding human sexuality. Staff members and faculty are not permitted to discuss any inappropriate or explicit information about their own personal relationships, dating, or sexual activities with any student in the School. This provision includes the use of cellular phones, text messages, e-mail, instant messaging and online chat rooms.

## **SEXUALLY ORIENTED MATERIALS**

Concordia Shanghai staff members, faculty, and volunteers are prohibited from possessing any sexually oriented materials (magazines, cards, videos, films, etc.) on School property or in the presence of students. If any such materials are purportedly necessary for classroom instruction, they must be approved in advance by the Principal.

## **INTERNET/ELECTRONIC MEDIA**

No computer at or related to Concordia Shanghai is to be used by staff members, faculty, volunteers, or students to visit pornographic or sexually inappropriate websites. Violation of this policy can lead to discipline from the Head of School. Any questions about inappropriate use of computers or the suitability of a particular website should be discussed with the Principal or Head of School.

## **SOCIAL MEDIA, ONLINE RESOURCES, & EMPLOYEE WEBSITES**

Concordia Shanghai generally views creating or contributing to social media (websites, blogs, message boards, social networks, etc.) by staff and community in a positive light. In fact, these tools can be a



blessing when used properly. They can increase communication, as well as build or maintain relational connections. We further recognize the desire by many to be a part of the exchange of ideas and social connection that these resources bring not only for those employed by Concordia but also with the broader community. In general, social media tools are neutral by nature: they can be used in both a positive and a negative way.

Parents entrust their children to Concordia. The School honors this trust by making every effort to provide a consistent, quality education that promotes the Expected Student Learning Results (ESLRs.) Each teacher is encouraged to maintain a website and/or other online resources for use in interactions with students and parents. Concordia's commitment to our students and families is reflected in our employees' respect for each individual.

As a part of the Concordia community you will be seen as a representative of Concordia and its mission. While you may view your blog, Facebook page, or a WeChat site as an extension of your personal life, others will associate you and the views you express as speaking for Concordia.

Please also keep in mind that technology changes rapidly, and as a result these policies may need to be changed from time to time. In all things we ask all to use good judgment when using social media, even if specific actions are not covered by these policies and the principles they express.

Guidelines for the entire community:

- **Maintain confidentiality.** Ask permission from others before including things they have said or the results of meetings, especially those that are meant to be for private or internal use only.
- **Use good judgment.** Remember that what you write is both permanent and public. You should always assume that what you write will be read by those you work with, by your boss, by your family, by other members of the community, and by the attorney of the person that doesn't like you. Always ask yourself if you are comfortable with ANYONE reading what you have written. Be careful that what you write will not hinder the work God has called you to do... now and in the future.
- **Never post when you are angry, upset, tired, or compromised in any way.** Think twice before you "hit send" and then, think a third time. Remember, once it is out there it cannot reliably be taken back.

We require all staff, volunteers, and students to follow the expectations listed below.

1. Online resources created by an employee which students and/or parents are directed to must be consistent with, and supportive of, the ethos cultivated by the School and identify the employee as a member of Concordia International School Shanghai.
2. Online resources must be consistent with, and supportive of, the school-approved curriculum. Questions regarding compliance are referred to the Assistant Head of School-Teaching and Learning.
3. **Misconduct:** Social media and electronic communication can be used inappropriately, e.g., emotional abuse, sexual abuse, bullying, harassment, and hazing. Such communication by faculty and staff members, volunteers, administrators, parents or students will not be tolerated.
  - a) Electronic communication should not contain or relate to any of the following:
    - Drugs or alcohol use;
    - Sexually oriented conversation, sexually explicit language or sexual activity;
    - An adult's personal life, social activities, relationship or family issues, or personal problems; and

- Inappropriate or sexually explicit pictures.  
A parent or guardian of a student who has concerns about contact with their child via electronic communication should meet with the division principal.
  - b) Any communication concerning a student's personal life, social activities, relationships, family issues or personal problems must be transparent, accessible and professional.
  - c) No computer at or related to Concordia Shanghai is to be used by staff members, faculty, volunteers, or students to visit pornographic or sexually inappropriate websites or other online information/activity that is incongruous with the mission and values of the School. Violation of this policy can lead to discipline from the Head of School. Any questions about inappropriate use of communication, computers, or the suitability of a particular website should be discussed first with the person who made the post and then, if necessary, with the Principal or Head of School. ***If you have concerns about an interaction you have with others online and connected to Concordia***, or concerns about your participation in social media, let your supervisor or the Head of School know immediately.
4. Students should not be directed to a faculty member's personal email, website, social networking site, etc. Contact with a student should be through their school accounts. i.e. Concordia email, Student Information System, Learning Management System, etc. Employees should not friend students on social media. **Exceptions:**
    - a) The student's family is personal friends with the employee and they have the permission of the student's family.
    - b) **Use of messaging systems (such as WeChat) or contacting students through personal phone numbers, may occur with the approval of the employee's supervisor and the student's parent.**
  5. **Use of Student Photos:** The parents' signature on the application and re-enrollment acknowledges that the parent knows the child may appear in materials used at and by the school and that when a student is selected as a featured marketing hero, the parent will be asked for explicit permission. However, no last name may be associated with a photo of a student without permission of the parent. In social media, employees of the school should not tag students.
  6. **Privacy:** School employees and students should recognize that there is no such thing as complete privacy on a social networking site. Take care in anything you post online. Please be aware that at all times you are a representative of Concordia Shanghai. Anything you post, including pictures, is a reflection upon the School. Keep your privacy settings at appropriate levels to protect yourself. Any violation in this policy may lead to disciplinary action, up to and including expulsion/termination of employment.
  7. Concordia employees will use US Copyright Law as the standard of practice when using online resources. Questions regarding compliance are referred to one of our librarians.
  8. Faculty, class, and club websites must be hosted via Concordia-provided or Concordia-authorized web services.
  9. Each employee must utilize school-provided technology (hardware, software, and systems), as specified by the Director of Technology, in carrying out school business.
    - a) This means that while performing their duties as a Concordia employee, faculty should use school-provided systems, e.g., Concordia email, Student Information System, Learning Management System, etc. for school-related activities, and
    - b) Not use email or host videos or websites on services not supported by Concordia, e.g., personal Gmail, video on YouTube outside of the school-supported account a WordPress website not hosted by Concordia, and so on.
    - c) Use of certain non-Concordia services, i.e., Quizlet, can generally be authorized as long as the service terms of use, such as proper self-identification, age limits, and location

restrictions, are observed. Note that the above list of school-supported services is by no means exhaustive. The Director of Technology can address questions and approve new sites.

d) When in doubt, ask.

10. The School can only maintain a limited set of online resources. However, to allow an employee to explore and evaluate new resources with a view to potential inclusion in the School online environment, the employee may, upon approval of the Director of Technology, utilize an online resource outside the current School online environment.
11. Should something you post generate interest from the press regarding anything that has a connection to Concordia, refer all those inquiries to your supervisor and/or the Head of School.

### **SOCIALIZING**

Concordia Shanghai employees should not be socializing with students off campus without approval of the student's parents.

### **SLEEPING ARRANGEMENTS**

It is anticipated that certain Concordia Shanghai activities may occasionally require that overnight sleeping arrangements be made for students and staff members or faculty. In the event that an activity requires sleeping arrangements, staff members and faculty will strictly observe the following rules; any exceptions to the below policies must be approved in advance by the Principal or HOS:

1. Staff members, faculty, and volunteers will monitor sleeping students periodically conducting visual bed checks to ensure that sleeping students remain in designated sleeping areas.
2. Only students of the same sex will be permitted to sleep in the same room.
3. At times, a staff member or faculty will sleep in the same room as students or in an adjoining room. However, staff members or faculty are prohibited from sleeping in a 1:1 ratio setting with students for any reason, unless the staff member or faculty is an immediate family member of the student.
4. In the event that overnight arrangements do not include standard beds, each staff member, faculty, and/or student will use single sleeping bags or blankets. In these instances a "one-person-to-one-bag or blanket" rule will be observed.
5. Staff members, faculty, volunteers, and students will be required to wear both top and bottom clothing while sleeping.
6. See specific expectations during student travel in the Travel Out of Shanghai policy.

### **VERBAL INTERACTIONS**

Verbal interactions between staff members, faculty, or volunteers and students should be positive and uplifting. Concordia Shanghai staff members, faculty, and volunteers should strive to keep verbal interactions encouraging, constructive, and be ever mindful of their mission of aiding parents in the educating children. Staff members, faculty, and volunteers are expected to refrain from swearing in the presence of students.

### **STUDENT SUPPORT OF EVENTS INVOLVING PARENTS**

On occasions students are recruited to support events sponsored by the school. This might be an event on campus where Student Ambassadors are used or it might be at an event off-campus. One off-campus event that happens annually is the Gala and Auction at which students must be juniors or seniors, be recommended by a teacher and have parental permission to participate. For this event all students will be dismissed no later than 10:45PM. At off-campus events there will be sufficient number of adult supervisors to ensure students are always within view of a supervisor.

**Safety Handbook**  
**Statement of Acknowledgment and Agreement**

I have reviewed Concordia International School Shanghai’s Safety Handbook and understand the importance of the matters set forth within the manual.

I understand that the handbook is subject to annual review and revision but may be modified at any time.

I acknowledge that any guideline may be amended, revised, or eliminated at any time by Concordia International School Shanghai and that it is my responsibility to review new guidelines that are created and distributed as well as those guidelines that are changed or deleted.

**For Volunteers:**

I further acknowledge and understand that the materials and guidelines contained in this policy statement in no way express or imply a contractual employment relationship between Concordia International School Shanghai and me. If I am applying as a volunteer, I acknowledge and agree that I will receive no compensation for hours that I have worked.

I have read the Safety Handbook and agree to follow and abide by these guidelines during my service at Concordia Shanghai.

\_\_\_\_\_  
Name (please print)

\_\_\_\_\_  
Signature

Date: \_\_\_\_\_

[This page is to be detached, signed, and delivered to the HR Department of the HOS Office. You may retain a copy for your files.]