



WESTOVER SCHOOL

Excerpted from the Westover School Employee Policy Manual

1-6A. Sexual Harassment

Sexual harassment, like other forms of harassment, will not be tolerated. It is the policy of the School that any form of sexual harassment or discrimination is forbidden whether by faculty, staff, individuals under contract with the School, volunteers, or other persons subject to the control of the School.

Sexual harassment is defined as conduct of a sexual nature whether verbal, physical or in writing, where submission to such conduct is made either explicitly or implicitly a term or condition of employment; submission to or rejection of such conduct is used as the basis for employment decisions; or such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment. Although not an exhaustive list, examples of the type of conduct prohibited by this policy include the following behaviors: unwelcome sexual advances, requests for sexual favors; obscene gestures; unwanted hugs or physical touches; displaying sexually graphic images; sending sexually suggestive or explicit emails or text messages; sexual or dirty jokes; unwelcome attention of a sexual nature, such as suggestive or lewd remarks or prolonged staring or leering at others; the threat or suggestion that continued employment or advancement depends on whether the employee will submit to or tolerate harassment; and other verbal or physical conduct of a sexual nature.

Depending upon the circumstances, improper conduct can also include sexual joking, vulgar or offensive conversation or jokes, commenting about an employee's physical appearance, conversation about your own or someone else's sex life, or teasing or other conduct directed toward a person because of his or her sex which is sufficiently severe or pervasive to create an unprofessional and hostile working environment.

1-6B. Sexual Harassment of Students

Faculty, staff and all others in our School community are expected to adhere to a standard of conduct that is respectful of our students. Accordingly, the School's prohibition of sexual harassment extends to our students. As applied to students in a school setting, sexual harassment is defined as conduct that is sexual in nature, unwanted, and denies or limits a student's ability to

participate in or benefit from the School's educational programs. Although not an exhaustive list, examples of conduct that could constitute sexual harassment include such things degrading sexual remarks, statements or other conduct that indicate that a student's submission to, or rejection of, a sexual overture will affect her grades, unwelcome attention of a sexual nature including verbal comments, physical touching or leering, displays of sexually suggestive objects or use of sexually suggestive remarks, emails, text messages, jokes, pictures or gestures, telling sexual or dirty jokes, or sending emails or displaying websites of a sexual nature.

Any School employee who witnesses or is otherwise aware of conduct towards a student that could constitute discrimination based on sex, sexual harassment or any improper conduct involving a student must immediately report such concerns in accordance with Section 1.6 of this policy.

1-6C. Professional Boundaries with Students

There are no circumstances in which a romantic, intimate or sexual relationship between any school employee and a student should ever occur. As a boarding community, faculty and staff must be acutely aware of the need to maintain appropriate boundaries between professional and personal obligations. While the School values the close relationships that are fostered based on mutual respect between the adults in our community and our students, it is imperative that all faculty and staff role model expected behavior at all times. Regardless of an employee's role at our School, all faculty and staff must ensure that they maintain appropriate professional boundaries with students at all times, including during less structured times of the School day, such as after regular instructional hours or off campus School events. Any violation of this policy, or failure to maintain appropriate professional relationships and boundaries with students, will result in consequences, up to and including termination of employment.

If concerns are raised regarding professional boundaries with students, an employee may be put on an immediate leave of absence while an investigation occurs if the circumstances warrant.

Safe School Training

Training and Support - Safe School Training Platform

Westover provides on-demand and supplemental training through Safe School Training. This online training platform is intended to supplement annual sexual abuse prevention and other training provided to faculty and staff. Training requirements will be assigned upon initial hiring by the School. Certain training will be mandatory for all employees; supplemental training may be assigned based upon an employee's job requirements. If an employee is hired in the middle of the academic year and misses any in-person training, they will be assigned to the Safe School

Training with a follow up conversation with their direct supervisor and any relevant administrator the direct supervisor deems appropriate.

The training portal can be accessed at: <https://westover-ct.safeschools.com/login>

1-10. Child Abuse and Mandated Reporting Policy

Because our work involves regular contact with children, Connecticut law requires certain individuals, known as mandated reporters, to report suspicions of abuse or neglect to appropriate authorities. These individuals, referred to as mandated reporters include all Westover School faculty, staff and other school employees or individuals under contract with the School who have regular contact with students and who provide services to or on behalf of our students.

Any employee or other individual who has questions about whether he or she is a mandated reporter and/or about these reporting obligations should consult with the Assistant Head of School and/or Head of School.

Beyond the legal obligations for mandated reporters, the School also believes that it is important for all adults who are part of the Westover community to be vigilant regarding the safety and well-being of students. For this reason, it is the policy of the School that all employees, regardless of whether they meet the definition for being a mandated reporter, as well as any adults who live on campus or who are part of the school community, to report concerns or suspicions of abuse, neglect, assault or any other form of inappropriate conduct involving any of our students to the Dean of Students, Assistant Head of School, Director of the Health Center and/or the Head of School.

What Must Be Reported?

Mandated reporters are required to report, or cause a report to be made, to the Connecticut Department of Children and Families (DCF) or to the police when, in the ordinary course of their employment or profession, they have reasonable cause to suspect or believe that a child under the age of 18 has been abused, neglected, or is placed in imminent risk of serious harm. The suspicion or belief of a mandated reporter may be based on factors including, but not limited to, observations, allegations, facts or statements by the child or victim, or a third party. Such suspicion does not require certainty or probable cause, and may include rumors or 3rd hand information.

In addition, if any mandated reporter or other adult member of our community has reasonable cause to suspect or believe that a School employee has sexually assaulted a student, regardless of the student's age, the employee or other individual should immediately report such suspicion to the Dean of Students, Director of the Health Center and/or Head of School, who will then in turn contact appropriate authorities and/or take other intermediate measures as needed to support the student.

For purposes of this policy, "abused" means that a child: (a) has had physical injury inflicted upon him or her other than by accidental means; (b) has injuries at variance with history given of them; or (c) or is in a condition resulting in maltreatment, such as, but not limited to, malnutrition, sexual molestation or exploitation, deprivation of necessities, emotional maltreatment or cruel punishment. "Neglected" means

that a child: (a) has been abandoned; (b) is being denied proper care and attention physically, emotionally, or morally; or (c) is being permitted to live under conditions, circumstances or associations injurious to his well-being.

Reporting Procedures for Mandated Reporters

Once a mandated reporter has reasonable suspicion of abuse or neglect, the mandated reporter is required to make a report, or cause a report to be made, as soon as practicable, but within 12 hours, to DCF and/or to law enforcement. Given this timeline, it is important for a mandated reporter to immediately notify the Dean of Students, Director of the Health Center and/or the Head of School of any suspicions of abuse or neglect and ensure that an oral report is made within the 12-hour timeline. The oral report can be made by calling the DCF Hotline: 1-800-842-2288.

Not later than 48 hours after making the oral report, the mandated reporter (or other individual acting on behalf of the mandated reporter) is required to submit a written report to DCF (DCF-136 Form) and should submit a copy of this form to the Dean of Students. The Dean of Students and/or Head of School will provide assistance and guidance to the mandated reporter with respect to the procedures for contacting DCF and submitting written reports and will coordinate any ensuing investigation with appropriate agencies.

If the allegation involves suspected abuse, neglect or sexual assault of a student by a school employee, the Head of School or his/her designee will immediately notify the student's parent(s) or guardian(s). While there is no legal obligation to notify parents regarding other reports to DCF, the Dean of Students and/or Head of School (or their designee) may notify parents/guardians if it is necessary and/or beneficial to do so following consideration of a variety of factors, including, but not limited to, the identity of the alleged abuser, any potential risks to the student and/or whether disclosure might impede an investigation by DCF or other authorities.

Retaliation Prohibited

Westover will not discharge or permit discrimination or retaliation against any employee who in good faith makes a report of abuse, neglect or sexual assault under this policy or applicable law or who testifies in any proceeding involving abuse or neglect. The School also prohibits any employee from hindering or preventing any mandated reporter from making a report to DCF under this policy. Any violation of this policy should be reported to the Assistant Head of School and/or Dean of Students.

Training and Professional Development

All faculty and staff are required to participate in child abuse prevention education and training that specifically addresses sexual and physical abuse among students. New employees will typically be expected to participate in this training during the first month of their employment at Westover.