

# IST Community Safeguarding Framework

---

## OVERVIEW

---



**INTERNATIONAL SCHOOL OF TIANJIN**

UPDATED SEPTEMBER 11, 2018

## TABLE OF CONTENTS

<b>Rationale .....</b>	<b>4</b>
<b>A. Child Protection.....</b>	<b>5</b>
<b>B. Safer Recruitment.....</b>	<b>6</b>
<b>C. Code of Conduct and Management of Safeguarding Concerns.....</b>	<b>7</b>
<b>D. Health &amp; Safety .....</b>	<b>9</b>
<b>Health, Wellbeing &amp; Inclusive Education .....</b>	<b>10</b>
<b>F. Digital Citizenship .....</b>	<b>Error! Bookmark not defined.</b>
<b>G. Behavior Management.....</b>	<b>12</b>
<b>H. Student Support Services .....</b>	<b>13</b>
<b>C. Code of Conduct and Management of Safeguarding Concerns.....</b>	<b>15</b>
1. <i>*Our Board and Administration requires that any adult who comes into contact with students as a result of their association with our school maintain appropriate boundaries and conduct. ....</i>	<i>16</i>
1.1. Guidelines: In safeguarding appropriate boundaries and conduct, all adults should .....	16
1.2. Expectations: Adults in contact with students at IST must.....	16
1.3. Prohibitions: Adults in contact with students at IST must never .....	16
2. <i>Our Employees work, learn, and act together in partnership with parents to shape each student’s purposes and acts toward socially acceptable ends, and to pursue the aspirations of the school’s Guiding Statements. ....</i>	<i>17</i>
2.1. Guidelines: In upholding the integrity and purposes of the school, IST employees should .....	17
2.2. Expectations: In pursuing the aspirations of our school’s Guiding Statements, IST employees must .....	17
3. <i>Our Employees and any other adult that provides direct service in support of students and student learning must demonstrate professional conduct at all times. ....</i>	<i>18</i>
3.1. Guidelines: In safeguarding appropriate conduct, all adults providing direct service to students must .....	18
3.2. Expectations: Adults providing direct service to students must.....	18
3.3. Prohibitions: Adults providing direct service to students must never .....	19
4. <i>Our Employees have a contractual obligation to conduct themselves at all times in such a manner so as not to jeopardize their legal status or to bring discredit to the school. ....</i>	<i>19</i>
4.1. Guidelines: In fulfilling their contractual obligations to the school, IST employees must .....	19
4.2. Expectations: In fulfilling their contractual obligations to the school, IST employees must .....	19
4.3. Prohibitions: In fulfilling their contractual obligations to the school, IST employees must never .....	20
5. <i>Our School prioritizes the highest level of protection for students through the provision of clear procedures that govern the management of student safeguarding concerns.....</i>	<i>20</i>
5.1. Guidelines: In managing safeguarding concerns and allegations about the conduct of staff .....	20
5.2. Purpose .....	20
5.3. Timeline .....	20
5.4. Reporting an allegation.....	21
5.5. Strategy Discussion .....	21
5.6. Inquiry.....	21

- 5.7. Supporting those involved ..... 22
- 5.8. Confidentiality..... 22
- 5.9. Resignations..... 23
- 5.10. Record Keeping..... 23
- 5.11. Action on conclusion of the case ..... 23
- 5.12. After the case..... 24
- 6. *Our School provides support processes for any employee that may be the subject of inquiries into misconduct or abuse.* ..... 24
  - 6.1. Staff Complaints and Grievances: Guidelines ..... 24
  - 6.2. Workplace Harassment..... 25

## **RATIONALE**

The Community Safeguarding Framework sits at the center of our school-wide efforts to promote the social, emotional and physical wellbeing of the entire IST Community. It is decidedly child-centered and places matters of child protection and safety at the forefront of school policies, community practices and administrative decision making. IST policies, practices and procedures aimed at child protection and child welfare are further guided by the United Nations Declaration of the Rights of the Child (1990) and reinforced by our School Philosophy.

The Community Safeguarding Framework Model contains Eight Essential Domains arising from IST Board of Governors 'Community Safeguarding' Policy 5.1j, that both govern the scope of our commitment and demonstrate the depth of our efforts to preserve the integrity and wellbeing of all members of the IST Community. Each of the Essential Domains is further structured by Mission and Objectives statements. These statements are written in such a way as to reflect the assertive and inclusive statements of the IST School Philosophy.

- A. *Child Protection*
- B. *Safer Recruitment*
- C. *Code of Conduct & Management of Safeguarding Concerns*
- D. *Health & Safety*
- E. *Health, Wellbeing & Inclusive Education*
- F. *Digital Citizenship*
- G. *Student Behavior Management*
- H. *Student Support Services*

# A. CHILD PROTECTION

## A. CHILD PROTECTION

Child Protection provides child-centered, family-focused services to protect children and young people from significant harm caused by abuse or neglect within the family or by others. It aims to ensure that children and young people receive support and services to deal with the effects of abuse and/or neglect on their wellbeing and development. We ensure that all students in our care are afforded a safe and secure environment in which to grow and develop.

### **Mission and Objectives**

1. *Our School provides an environment where students feel safe, learn, develop and have a voice.*
2. *Our School promotes community awareness of, and provides training for, safeguarding students.*
3. *Our Child Protection Officer monitors and reviews child protection practices and procedures.*
4. *Our Teachers equip and develop in students, the agency, skills and knowledge needed to keep themselves safe.*
5. *Our School has procedures for the identification and reporting of cases where harm or risk of harm to a student is suspected and ensures that all staff are aware of such procedures.*
6. *Our Staff supports students who have suffered abuse or who may be at risk.*
7. *Our School has procedures in place to facilitate and promote the safe use of technology.*
8. *Our Administration ensures safe practices to verify the suitability of staff, volunteers and visitors.*

IST endorses the United Nations Convention on the Rights of the Child (UNCRC), of which the host country, China, is a signatory. The People’s Republic of China (PRC) declares that it protects a wide range of children’s rights through domestic legislation and by ratifying and joining the relevant international treaties such as the UNCRC. The PRC Constitution provides for the state protection of children and prohibits maltreatment of children. Among many laws and regulations providing children’s rights protection, the primary law in this field is *The PRC Law on the Protection of Minors* (first passed in 1991, revised in 2006, and entered into force in 2007). This law details responsibilities of families, schools, and the government with regard to the protection of children’s rights, and judicial protection.

### **Forms of abuse and neglect**

<b>Forms of abusive behavior are defined as:</b>	
<i>Physical Abuse</i>	Non-accidental injury including bruises, burns, human bites, or beatings which have been intentionally inflicted.
<i>Sexual Abuse</i>	Where a child is used for the sexual gratification of another person as in obscene conversation, exposure to pornographic material, exhibitionism, molestation, incest, rape, or sexual exploitation.
<i>Emotional Abuse</i>	Behaving in an excessive or aggressive manner such as teasing or verbal abuse that demeans and belittles the child, bullying, and lack of support or guidance.
<i>Neglect</i>	Inadequate supervision, persistent lack of provision of basic human necessities such as food, clothing, shelter, medical care, or the failure to protect the child from exposure to any kind of danger, which affects the child’s health or development.

*List 1—Critical Definitions*

## B. SAFER RECRUITMENT

### B. SAFER RECRUITMENT

Community members shall conscientiously follow all school procedures intended to assure the safety, health, security and wellbeing of students and all others participating in school activities or using school facilities. This shall include compliance with any and all requirements and regulations as set by the government of China, and school regulations pertaining to safeguarding.

This document shall be read in conjunction with the IST Board of Governors Policy Manual (specifically Section 5.4 Personnel: Selection and Deployment) and the IST Community Safeguarding Framework.

IST is committed to safeguarding and promoting the welfare of children and young people and requires that all staff and volunteers share in this commitment. It is recognized that this can only be achieved through sound safeguarding procedures, ongoing training, and the recruitment and retention of competent, motivated employees who are suited to, and fulfilled in, the roles they undertake. IST implements robust recruitment procedures and checks for appointing staff and volunteers to ensure that all reasonable steps are taken not to appoint a person who is unsuitable to work with children, or who is disqualified from working with children, or does not have the suitable skills and experience for the intended role.

#### **Mission and Objectives**

- 1. Our School is fully committed to equality of opportunity in the recruitment, selection, and promotion of employees.*
- 2. Our School seeks to recruit and appoint suitably experienced and qualified personnel with formally verified qualifications.*
- 3. Our Administration implements robust recruitment procedures when appointing staff, externally contracted workers and volunteers to ensure that all reasonable steps are taken not to appoint a person who is unsuitable to work with children, or who is disqualified from working with children, or does not have the suitable skills, experience of physical well-being for the intended role.*
- 4. Our School provides an orientation program for both new and returning staff which prepares them to function well within the school generally, effectively execute their specific roles, familiarizes them with the IST Community Safeguarding Framework and associated regulations and procedures, and (in the case of expatriates new to Tianjin) become familiar with local living conditions.*
- 5. Our Administration maintains two files for expatriate employees (both HR and Director), and one for local employees, externally contracted workers and volunteers (HR only), verifying that appointments conform to the guidelines outlined in the IST Community Safeguarding Framework, and specifically Section B - Safer Recruitment.*

## C. CODE OF CONDUCT & MANAGEMENT OF SAFEGUARDING CONCERNS

### C. CODE OF CONDUCT AND MANAGEMENT OF SAFEGUARDING CONCERNS

In our school we embrace an ethos of community and caring, and as such IST is fully committed to safeguarding the rights and wellbeing of all members of our community. At the same time we recognize that our primary responsibility as an educational institution is to ensure the safety and protection of the students in our care, and this requires that adults interacting with students or providing service in our school are men and women of integrity, high ideals, and sensitivity in human relationships. To maintain and promote these essentials, all IST employees, external contract staff, volunteers, and visitors to the school who interact directly with children are required to adhere to the IST Code of Conduct. As adults associating with young people in an educational setting we formally acknowledge that we must at all times –*be it in our professional or private lives*– be aware of our ethical and legal responsibilities towards our school and host country, and towards the safeguarding of children enrolled in or visiting the school.

All IST employees, external contract staff, volunteers, and visitors to the school who interact directly with children are required to sign the relevant IST Personal Declaration Form (inclusive of Code of Conduct), declaring:

- A. *Acknowledgement of having read and understood the school's Safeguarding Framework Overview;*
- B. *Commitment to strictly follow the rules and guidelines in the Code of Conduct –including those related to the management of safeguarding concerns and allegations about the conduct of staff– as a condition of providing services to students and the school;*
- C. *Commitment to comply with the mandatory regulations of IST to report suspected misconduct or child abuse; and–*
- D. *Commitment to cooperate fully in any inquiry into misconduct or the abuse of a student or students.*

NOTE: Asterisked (\*) Item 1 in the following 'Mission and Objectives' shall apply to all adults. Non-asterisked items 2-6 apply to IST employees and any other adult whose purposes require that they interact directly with students. **The IST Administration reserves the broad authority to exercise discretion in applying non-asterisked items 2-6 to any adults for any reason when they are present on the IST campus; even those guidelines that may not be specifically enumerated for a given role, group or individual.**

#### **Mission and Objectives: Code of Conduct**

1. *\*Our Board and Administration requires that any adult who comes into contact with students as a result of their association with our school maintain appropriate boundaries and conduct.*
2. *Our Employees work, learn, and act together in partnership with parents to shape each student's purposes and acts toward socially acceptable ends, and to pursue the aspirations of the school's Guiding Statements.*
3. *Our Employees and any other adult that provides direct service in support of students and student learning must demonstrate professional conduct at all times.*
4. *Our Employees have a contractual obligation with respect to employment to conduct themselves at all times in such a manner so as not to jeopardize their legal status or to bring discredit to the school.*

5. *Our School prioritizes the highest level of protection for students through the provision of clear procedures that govern the management of student safeguarding concerns.*
6. *Our School provides support processes for any employee that may be the subject of inquiries into misconduct or abuse*

## D. HEALTH & SAFETY

### D. HEALTH & SAFETY

Our commitment to Health & Safety is reflected in a comprehensive approach to a multitude of items and issues that relate to community safety and wellbeing. Health & Safety Policies, Practices and Procedures are a matter of priority that receive continued, ongoing attention from the entire community under the guidance of the Board of Governors and the Director.

#### **Mission and Objectives**

1. *Our Director is duly empowered to ensure that comprehensive Health and Safety Policies and Practices exist.*
2. *Our Health & Safety Committee assists in routine oversight and management of health and safety practices and concerns.*
3. *Our Staff takes responsibility for all community members in their care.*
4. *Our Health & Safety Policies and Practices contain detailed guidance for emergency evacuations, drills and necessary procedures to keep all community members safe.*
5. *Our School maintains detailed procedures for medical emergencies and contacts with relevant, local health care providers and emergency responders.*
6. *Our School has effective plans and contingencies in place to anticipate environmental safety issues and disease vectors.*
7. *Our Policies and Procedures prioritize the emotional and physical health and safety of students.*
8. *Our School asserts that clean and well-cared for facilities contribute greatly to child safety and community wellbeing.*
9. *Our Policies and Procedures ensure clean and healthy foods and food service to foster student and community wellbeing.*
10. *Our Policies and Procedures ensure a safe and secure campus for all community members and visitors.*

## E. HEALTH, WELLBEING & INCLUSIVE EDUCATION

### HEALTH, WELLBEING & INCLUSIVE EDUCATION

Health, Wellbeing and Inclusive Education is a critical component of our commitment to student welfare. Our curriculum promotes agency among students according to their individual needs, interests and abilities while maintaining an awareness of the unique and sometimes differing norms and expectations within different cultures and contexts. The curriculum also aims to help students take proactive measures to maintain their own ethical, mental, physical and emotional integrity as they grow and mature.

#### **Mission and Objectives**

- 1. Our Teachers help all children to understand themselves and the changes that they encounter as a natural part of the growth process.*
- 2. Our Teachers help all children to negotiate feelings in themselves and in others while remaining respectful of proper boundaries and behaviors.*
- 3. Our Curriculum helps all children to recognize and be able to articulate difficulties by feeling safe and secure in seeking out help and guidance when necessary.*
- 4. Our Curriculum encourages all children to be open-minded, balanced, ethical, thoughtful, and resilient actors in their own lives and in the lives of those around them.*

## F. DIGITAL CITIZENSHIP

### F. DIGITAL CITIZENSHIP

Digital citizenship guides students to be kind, respectful and responsible agents in the digital world. Students learn about the rights, responsibilities and opportunities of living, learning and working in an interconnected digital world, and they act and model in ways that are safe, legal and ethical. The digital citizenship curriculum is the responsibility of all teachers.

#### Mission and Objectives

1. *Our Students learn to engage in positive, safe, legal and ethical behaviors when using technology, (including social interactions online or when using networked devices) through our Responsible Use Policy.*
2. *Our Teachers develop in students, the agency, skills and knowledge to exercise responsible digital citizenship.*

DIGITAL CURRICULUM OUTLINE	
<b>K-2</b>	<ul style="list-style-type: none"> <li>• <i>Searching the internet</i></li> <li>• <i>Staying safe online</i></li> <li>• <i>Show respect online</i></li> </ul>
<b>3-5</b>	<ul style="list-style-type: none"> <li>• <i>Protecting digital identity</i></li> <li>• <i>Citing sources</i></li> <li>• <i>Privacy for everyone</i></li> <li>• <i>Cyberbullying and staying safe online</i></li> </ul>
<b>6-8</b>	<ul style="list-style-type: none"> <li>• <i>Strategic searching</i></li> <li>• <i>Cyberbullying and staying safe online</i></li> <li>• <i>Balancing tech-time</i></li> <li>• <i>Citing sources and remixing content</i></li> <li>• <i>Impact of words and actions online</i></li> </ul>
<b>9-12</b>	<ul style="list-style-type: none"> <li>• <i>Strategic searching</i></li> <li>• <i>Cyberbullying and staying safe online</i></li> <li>• <i>Balancing tech-time</i></li> <li>• <i>Citing sources and remixing content</i></li> <li>• <i>Online relationships</i></li> <li>• <i>Sexting, trolling and negative online behaviors</i></li> <li>• <i>Data protection</i></li> <li>• <i>Impact on your future</i></li> </ul>

## G. STUDENT BEHAVIOR MANAGEMENT

### G. BEHAVIOR MANAGEMENT

Our code of student behavior rests on the principles of: respect for themselves; respect for others; respect for their own and others' property. All detailed school regulations, bus rules, etc. will be logical extensions of these three basic expectations and will be explained to students in those terms.

#### **Mission and Objectives**

1. *Our Policies are intended to protect student rights and responsibilities while rewarding success and positive social behavior.*
2. *Our Students represent their homes, the school and their cultural community through courteous and exemplary conduct both in school and in public.*
3. *Our Policies and practices are age appropriate, considerate of student and community welfare and impartially applied.*
4. *Our Teachers and students work together to foster a community of respect and inclusivity.*
5. *Our School implements policies and practices that ensure student wellbeing and ensure the consistent implementation of behavior expectations among all community members.*

## H. STUDENT SUPPORT SERVICES

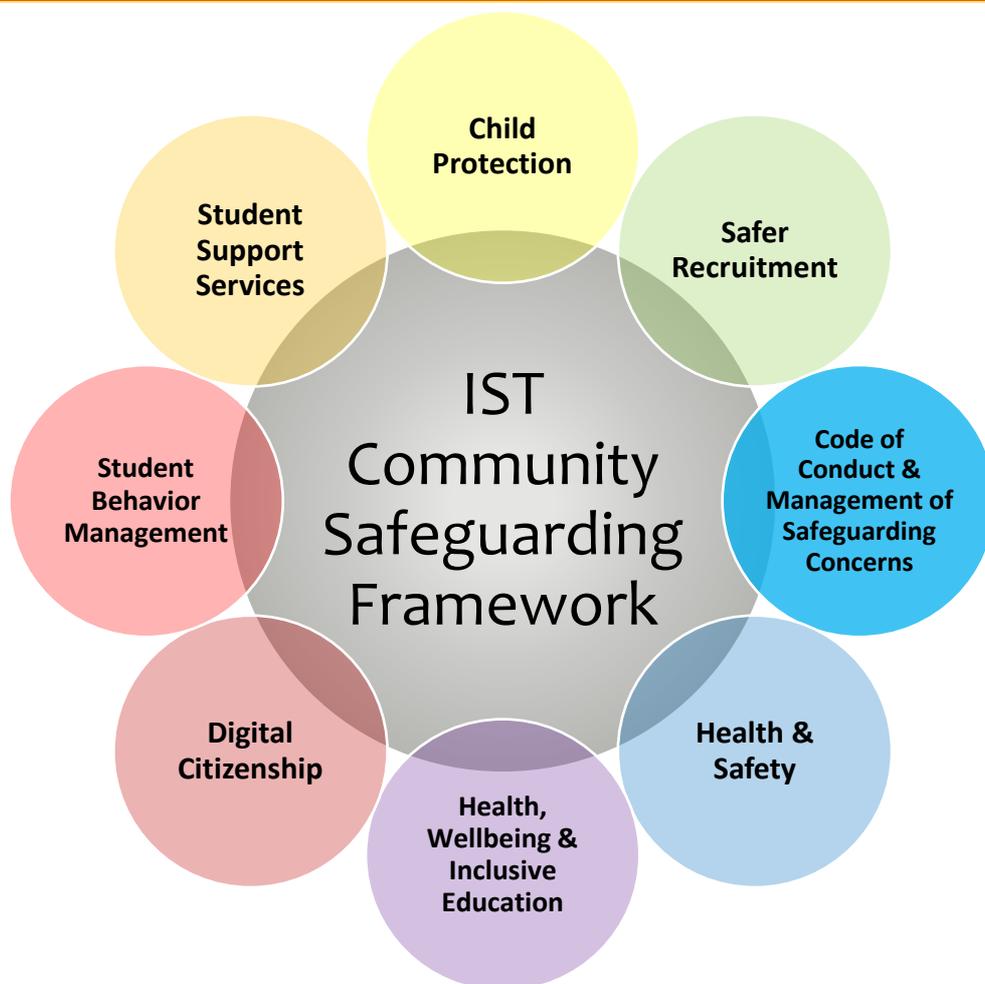
### H. STUDENT SUPPORT SERVICES

IST supports the belief that all students should be allowed to demonstrate their knowledge and understanding under conditions that meet their individual needs. To that end, IST offers an array of accommodations including, but not limited to, specialized staff, in-class support, small classes and appropriately structured lessons.

#### **Mission and Objectives**

1. *Our Student Support Services ensure that the language and learning needs of all students are met effectively and compassionately by appropriately qualified staff.*
2. *Our Student Support Services support individual needs of students through dedicated and comprehensive approaches based on appropriate data.*
3. *Our School provides counselling programs that are developmentally appropriate and help students develop skills, disciplines and dispositions necessary to succeed in school and life.*

## C. CODE OF CONDUCT & MANAGEMENT OF SAFEGUARDING CONCERNS



### IST BOARD OF GOVERNORS POLICY 5.1J COMMUNITY SAFEGUARDING

Community members shall conscientiously follow all school procedures intended to assure the safety, health, security and wellbeing of students and all others participating in school activities or using school facilities. This shall include compliance with any and all requirements and regulations as set by the government of China, and school regulations pertaining to safeguarding, including:

- A. *Child Protection*
- B. *Safer Recruitment*
- C. *Code of Conduct & Management of Safeguarding Concerns***
- D. *Health & Safety*
- E. *Health, Wellbeing & Inclusive Education*
- F. *Digital Citizenship*
- G. *Student Behavior Management*
- H. *Student Support Services*

## C. CODE OF CONDUCT AND MANAGEMENT OF SAFEGUARDING CONCERNS

In our school we embrace an ethos of community and caring, and as such IST is fully committed to safeguarding the rights and wellbeing of all members of our community. At the same time we recognize that our primary responsibility as an educational institution is to ensure the safety and protection of the students in our care, and this requires that adults interacting with students or providing service in our school are men and women of integrity, high ideals, and sensitivity in human relationships. To maintain and promote these essentials, all IST employees, external contract staff, volunteers, and visitors to the school who interact directly with children are required to adhere to the IST Code of Conduct. As adults associating with young people in an educational setting we formally acknowledge that we must at all times –*be it in our professional or private lives*– be aware of our ethical and legal responsibilities towards our school and host country, and towards the safeguarding of children enrolled in or visiting the school.

All IST employees, external contract staff, volunteers, and visitors to the school who interact directly with children are required to sign the relevant IST Personal Declaration Form (inclusive of Code of Conduct), declaring:

- A. *Acknowledgement of having read and understood the school's Safeguarding Framework Overview;*
- B. *Commitment to strictly follow the rules and guidelines in the Code of Conduct –including those related to the management of safeguarding concerns and allegations about the conduct of staff– as a condition of providing services to students and the school;*
- C. *Commitment to comply with the mandatory regulations of IST to report suspected misconduct or child abuse; and–*
- D. *Commitment to cooperate fully in any inquiry into misconduct or the abuse of a student or students.*

NOTE: Asterisked (\*) Item 1 in the following 'Mission and Objectives' shall apply to all adults. Non-asterisked items 2-6 apply to IST employees and any other adult whose purposes require that they interact directly with students. **The IST Administration reserves the broad authority to exercise discretion in applying non-asterisked items 2-6 to any adults for any reason when they are present on the IST campus; even those guidelines that may not be specifically enumerated for a given role, group or individual.**

### **Mission and Objectives: Code of Conduct**

1. *\*Our Board and Administration requires that any adult who comes into contact with students as a result of their association with our school maintain appropriate boundaries and conduct.*
2. *Our Employees work, learn, and act together in partnership with parents to shape each student's purposes and acts toward socially acceptable ends, and to pursue the aspirations of the school's Guiding Statements.*
3. *Our Employees and any other adult that provides direct service in support of students and student learning must demonstrate professional conduct at all times.*
4. *Our Employees have a contractual obligation with respect to employment to conduct themselves at all times in such a manner so as not to jeopardize their legal status or to bring discredit to the school.*
5. *Our School prioritizes the highest level of protection for students through the provision of clear procedures that govern the management of student safeguarding concerns.*
6. *Our School provides support processes for any employee that may be the subject of inquiries into misconduct or abuse*

**1. \*Our Board and Administration requires that any adult who comes into contact with students as a result of their association with our school maintain appropriate boundaries and conduct.**

**1.1. Guidelines: In safeguarding appropriate boundaries and conduct, all adults should**

- a) *Remain wholly mindful of our own and other persons’ vulnerability, especially when working alone with students, and remain particularly aware that we are responsible for maintaining physical, emotional, and sexual boundaries in such interactions.*
- b) *Default to doing what is safe in the event of needing to determine whether to do what is safe versus what is expedient.*

**1.2. Expectations: Adults in contact with students at IST must**

- |  |   |
|--|---|
| <ul style="list-style-type: none"> <li>a) <i>Show prudent discretion before touching a student, and awareness of how physical touch may be perceived or received, and whether it would be appropriate.</i></li> <li>b) <i>Ensure that physical contact with students never occurs in a way that might be construed or misconstrued as sexual in nature.</i></li> <li>c) <i>Organize work and the workplace in such a way as to minimize any risks.</i></li> <li>d) <i>Hold one-on-one meetings with students in public areas whenever possible so that the interaction can be observed. If rooms do not have glass panels, the door will be open during one-on-one meetings. In addition, another staff member will be notified of the time and place of any such meeting.</i></li> <li>e) <i>Quickly identify situations that may place a student at risk and know how to deal with such situations.</i></li> <li>f) <i>Always intervene when evidence or other reasonable cause leads us to suspect that a student is being mistreated or abused in any way. Suspected abuse or neglect will be immediately reported to a Child Protection Officer.</i></li> </ul> | <ul style="list-style-type: none"> <li>g) <i>Report any concerns, suspicions or certainties about possible abuse or maltreatment of a child in accordance with the IST Code of Conduct ‘Mission and Objectives’ (Management of Safeguarding Concerns Item 4) and IST’s overarching Safeguarding Framework.</i></li> <li>h) <i>Always be as visible as possible to other adults when working with students.</i></li> <li>i) <i>Ensure that members of staff develop a sense of responsibility with regard to the way they operate so that any actions or forms of behavior that are inappropriate or may lead to abuse of children do not go unnoticed or are tolerated.</i></li> <li>j) <i>Maintain the highest personal and professional profile.</i></li> <li>k) <i>Respect children’s rights as identified by the UNCRC and treat them with fairness, honesty, dignity and respect.</i></li> <li>l) <i>Refrain from the use of any language that trivializes reference to safeguarding and the protection of children.</i></li> <li>m) <i>Obtain administrative approval to use non-IST sanctioned communication platforms (e.g. WeChat) before engaging with students for such purposes.</i></li> </ul> |
|--|---|

**1.3. Prohibitions: Adults in contact with students at IST must never**

- |   |   |
|---|---|
| <ul style="list-style-type: none"> <li>a) <i>Hit, physically assault or physically or psychologically abuse any student.</i></li> <li>b) <i>Act in ways intended to shame, humiliate, belittle or degrade students, or otherwise perpetrate any form of emotional abuse.</i></li> <li>c) <i>Act in ways that set a negative example for any student present.</i></li> <li>d) <i>Engage in sexual activity or have sexual relations with any student under any circumstances, regardless of the student’s age</i></li> </ul> | <ul style="list-style-type: none"> <li><i>and the definition of legal consent and the age of majority in the PRC.</i></li> <li>e) <i>Have relations with a student that in any way constitutes exploitation, maltreatment or abuse.</i></li> <li>f) <i>Act in ways that may be abusive or put a child at risk of exploitation, maltreatment or abuse.</i></li> <li>g) <i>Use language, make suggestions or offer advice that is inappropriate, offensive or abusive.</i></li> </ul> |
|---|---|

- h) *Behave in a manner that is inappropriate or sexually provocative.*
- i) *Establish or engage in private/personal contact with students, be it in person or using communication tools and devices, including but not limited to, e-mail, chats, SMS, and social networks. Communications with students must use school-sanctioned processes and be for the purpose of supporting student learning and welfare.*
- j) *Sleep in the same bed as a student.*
- k) *Sleep in the same room as a student, with the exception of school sanctioned and monitored activities.*
- l) *Do things for students of a personal nature that the student can do themselves.*
- m) *Give or accept money, goods or other benefits to/from a student without the knowledge of their senior administrator.*
- n) *Offer transport in their car to a student without parental consent, except in cases of emergency, in which case a member of the senior administration must be notified.*
- o) *Condone or participate in any behavior by students that is illegal, abusive or endangers their safety.*
- p) *Discriminate against, show differential treatment towards or favor particular students to the exclusion of others.*
- q) *Possess, share, display or distribute pornography or images/text that could be construed as being pornographic in nature on any devices.*

This list is neither exhaustive nor exclusive. The basic principle is that adults must avoid behaviors that may be inappropriate or potentially abusive towards children.

## **2. Our Employees work, learn, and act together in partnership with parents to shape each student's purposes and acts toward socially acceptable ends, and to pursue the aspirations of the school's Guiding Statements.**

### **2.1. Guidelines: In upholding the integrity and purposes of the school, IST employees should**

Embrace the school's Guiding Statements, and actively seek to promote intercultural learning and international mindedness within physical and social environments that ensure the safeguarding of community members.

### **2.2. Expectations: In pursuing the aspirations of our school's Guiding Statements, IST employees must**

- |  |  |
|--|--|
| <ul style="list-style-type: none"> <li>a) <i>Act with honesty, integrity, and fairness at all times.</i></li> <li>b) <i>Work to improve education in the community and to strengthen the community's moral, spiritual, and intellectual life.</i></li> <li>c) <i>Participate in community activities with due consideration for obligations to students, family, and ourselves.</i></li> <li>d) <i>Respect the basic responsibility of parents for their children, while seeking to establish friendly and cooperative relationships with the home.</i></li> <li>e) <i>Keep parents informed about the progress of their children with respect to the purposes of the school.</i></li> </ul> | <ul style="list-style-type: none"> <li>f) <i>Provide parents with information that will serve the best interests of their children and are discreet with information received from parents.</i></li> <li>g) <i>Discuss controversial issues from an objective point of view, thereby keeping classes free from partisan opinions.</i></li> <li>h) <i>Deal justly and impartially with students regardless of their physical, mental, emotional, political, economic, social, racial or religious characteristics.</i></li> <li>i) <i>Recognize the differences among students and seek to meet their individual needs.</i></li> <li>j) <i>Encourage students to formulate and work for high individual goals in the development of their physical, intellectual, creative, and spiritual endowment.</i></li> </ul> |
|--|--|

- |   |  |
|---|--|
| <p>k) Aid students to develop an understanding and appreciation not only of the opportunities and benefits of democratic government but also of their obligations to it.</p> <p>l) Respect the right of every student to have confidential information about him/herself withheld</p> | <p>except when it is released for school personnel, authorized external agencies, or is required by law.</p> <p>m) Discuss matters relating to any given student with their parents alone.</p> |
|---|--|

**3. Our Employees and any other adult that provides direct service in support of students and student learning must demonstrate professional conduct at all times.**

**3.1. Guidelines: In safeguarding appropriate conduct, all adults providing direct service to students must**

Adhere to all reasonable patterns of social behavior and personal conduct accepted in the community for professional persons.

**3.2. Expectations: Adults providing direct service to students must**

- a) Comply with IST’s Digital Citizenship Guidelines, with student communications governed accordingly.
- b) Conform to appropriate standards of grooming and attire for a professional setting. Clothing choices must not conflict with standards expected of the students, should be suitable for the discharge of professional duties, and should comply with standards of modesty so as to cause neither offence nor embarrassment to community members. The administration, at their discretion, will handle individual cases of dress that may need special attention.

**GENERAL GUIDELINES**

- |  |   |   |
|--|---|---|
| <ul style="list-style-type: none"> <li>• Hats should not be worn inside the school building during school hours</li> <li>• Non-prescription sunglasses may not be worn inside the school building during school hours</li> <li>• Obscene/suggestive designs, offensive slogans or pictures, drug and alcohol references</li> </ul> | <p>(slogans and pictures), may not be displayed on clothing or accessories</p> <ul style="list-style-type: none"> <li>• Clothing should be clean and neat without holes, fraying or tears</li> <li>• ‘Sweats’ may not be worn, except for PE and at special events</li> </ul> | <ul style="list-style-type: none"> <li>• Blue jeans (including faded, frayed, torn, or acid- or stone-washed) may not be worn; however, more formal non-blue and ‘trouser’ varieties may be permitted if clearly distinct from standard jean cuts.</li> <li>• Undergarments may not be exposed</li> </ul> |
|--|---|---|

**MALE STAFF**

- Collared shirts are required (includes soft-collar or traditional and fold-over turtleneck, but not mock turtleneck or rollover)
- Shirts with tails must be tucked in
- Full length trousers are to be worn (but not parachute/cargo pants)
- Shorts may not be worn

- Shoes: closed leather shoes are to be worn (no sandals or sneakers may be worn)
- Sweaters: turtleneck (zip or other), V-neck and crewneck (if appropriate shirt is visible) may be worn

**FEMALE STAFF**

- Spaghetti straps and halter tops may not be worn (necklines must be modest)
- No revealing garments (e.g. overly sheer)

- Women's skirts/dresses/shorts/culottes and slits and other openings shall terminate no more than (10 - 15cm) above the knee
- Leggings may be worn only under a dress/skirt
- Footwear must be worn at all times. Shoes traditionally worn around the home (i.e., slippers, crocs, house shoes, etc.) or to the beach (i.e., flip-flop/jandal designs) are not permitted. Dress sandals require straps.

**Note:** Certain dispensations may be approved by the administration upon personal request, or when staff members have no formal contact with students and parents.

### 3.3. Prohibitions: Adults providing direct service to students must never

- |  |  |
|--|--|
| <ul style="list-style-type: none"> <li>a) Swear or use other expletives or profanities.</li> <li>b) Proselytize or commercially solicit services, products or memberships without written permission by the Director.</li> <li>c) Provide students with or use tobacco products, alcohol and drugs, or inappropriate images or material deemed inappropriate by the school.</li> </ul> | <ul style="list-style-type: none"> <li>d) Possess, use, distribute or sell illegal drugs at any time, whether on or off school premises. To do so shall be deemed cause for dismissal.</li> <li>e) Possess, share, display or distribute pornography or images/text that could be construed as being pornographic in nature on any devices.</li> </ul> |
|--|--|

## 4. Our Employees have a contractual obligation to conduct themselves at all times in such a manner so as not to jeopardize their legal status or to bring discredit to the school.

### 4.1. Guidelines: In fulfilling their contractual obligations to the school, IST employees must

- |   |  |
|---|--|
| <ul style="list-style-type: none"> <li>a) Respect the community in which we are employed and are loyal to our school in deed, word and disposition.</li> <li>b) Conduct professional business through proper channels.</li> </ul> | <ul style="list-style-type: none"> <li>c) Show respect for the people of the PRC, their customs, language and mores through both our speech and behavior.</li> </ul> |
|---|--|

### 4.2. Expectations: In fulfilling their contractual obligations to the school, IST employees must

- |  |   |
|--|---|
| <ul style="list-style-type: none"> <li>a) Act in accordance with the laws of the People's Republic of China at all times.</li> <li>b) Accept and comply with the regulations governing the management of personnel as outlined in the IST Personnel and Procedure Manual, and including those related to disciplinary procedures and contract and employment suspension and termination <b>5.2 (see point 5.2f)</b></li> <li>c) Familiarize ourselves with the IST Community Safeguarding Framework and any contractual implications outlined therein.</li> <li>d) Understand and accept the terms and conditions of our written contracts.</li> </ul> | <ul style="list-style-type: none"> <li>e) Discuss any problems directly with administrators or other staff members who are most immediately responsible.</li> <li>f) Refrain from discussing confidential and official information with unauthorized persons.</li> <li>g) Actively discourage anonymous communication at the school and not respond or react to anonymous letters or messages unless there is a clear and direct threat to the safety of students or community members.</li> <li>h) Follow established IST procedures governing the registration of 'Complaints and Grievances' and 'Workplace Harassment' (<b>see Staff Complaints and Grievances: Guidelines</b>) at any time that we believe that discussions and actions to address problems and concerns have been insufficient or inappropriate.</li> </ul> |
|--|---|

**4.3. Prohibitions: In fulfilling their contractual obligations to the school, IST employees must never**

- |   |   |
|---|---|
| <ul style="list-style-type: none"> <li>a) <i>Bring either the school or themselves into disrepute with the people and government of the People’s Republic of China.</i></li> <li>b) <i>Solicit or accept, directly or indirectly, any gift, gratuity, favor, entertainment, loan, or any other thing of monetary value from any person, organization or government which appears to be offering the gift with the hope or expectation of obtaining advantage or preference for any purpose in dealing with the school.</i></li> <li>c) <i>Accept gifts at an estimated value greater than RMB 1000 without permission from the Director.</i></li> </ul> | <ul style="list-style-type: none"> <li>d) <i>Engage in any activity that may constitute a conflict of interest.</i></li> <li>e) <i>Engage in employment or any private activity that would interfere with time or energy required for schoolwork, or would compromise the school, or would negatively affect the school in any other way, unless otherwise approved by the Director.</i></li> <li>f) <i>Make decisions about hiring, promotion, salaries, benefits, or any other employment-related matter involving an immediate family member.</i></li> </ul> |
|---|---|

**5. Our School prioritizes the highest level of protection for students through the provision of clear procedures that govern the management of student safeguarding concerns.**

**5.1. Guidelines: In managing safeguarding concerns and allegations about the conduct of staff**

- |   |   |
|---|---|
| <ul style="list-style-type: none"> <li>a) <i>Our school commits to the thorough and efficient management of any concern raised about the conduct of a member of staff or allegations of abuse perpetrated by a teacher, or any other adult, child, or volunteer in our school.</i></li> </ul> | <ul style="list-style-type: none"> <li>b) <i>Our school ensures that all relevant adults and children are aware of the procedure for the management of concerns and the inquiry into allegations of abuse.</i></li> <li>c) <i>Our school ensures that students feel comfortable and have safe means through which to voice their concerns.</i></li> </ul> |
|---|---|

**5.2. Purpose**

The procedure for dealing with concerns and allegations against staff depends upon the situation and circumstances surrounding the allegation. This protocol must be followed when dealing with concerns and allegations but may be adapted to each case. This protocol will be used alongside the school’s Board of Governors Policy Manual and the IST Safeguarding Framework to detail the procedures outlined in both for managing an allegation. The protocol will be used in any case where it is suspected or alleged that a member of staff or a volunteer at the school has:

- |   |   |  |
|---|---|--|
| <ul style="list-style-type: none"> <li>• <i>behaved in such a way that may have harmed a child or may have intended to harm a child acted outside of the law</i></li> </ul> | <p style="text-align: center;"><i>in relation to dealings with a child.</i></p> <ul style="list-style-type: none"> <li>• <i>behaved in any way that suggests they may be</i></li> </ul> | <p style="text-align: center;"><i>unsuitable to work with children.</i></p> <ul style="list-style-type: none"> <li>• <i>behaved in a way that is harmful to the reputation of the School.</i></li> </ul> |
|---|---|--|

**5.3. Timeline**

It is imperative that concerns and allegations against staff are dealt with as quickly as possible to:

- *minimize the risk to the child*

- *minimize the impact on the child's progress*
- *ensure a fair and thorough inquiry for all parties.*

To enable this to happen, all relevant adults and students should be aware of the procedures set out in this document.

#### 5.4. Reporting an allegation

All allegations should be reported immediately to the Director. Complaints about the Director should be reported to the Presiding Vice-Chair of the IST Board of Governors.

Staff who are concerned about the conduct of a colleague towards a child - may feel that they are placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardize their colleague's career. All staff must remember that the welfare of the child is paramount and must report their concerns immediately as outlined in all safeguarding training and policy.

Upon receiving a report of concern or an allegation, the Director will contact the Presiding Vice-Chair and together they will decide, in an initial discussion on the basis of all available information, the appropriate level of seriousness of the concern or allegation and whether:

- *more information is required; or*
- *no further actions are needed; or*
- *a strategy discussion should take place; or*
- *the matter should be dealt with informally in school; or*
- *there should be immediate involvement of the police or other external agencies.*

#### 5.5. Strategy Discussion

All allegations concerning abuse must be the subject of a Strategy Discussion. The Presiding Vice-Chair of the IST Board of Governors must be informed about all Strategy Discussions.

Strategy Discussions may involve: The Presiding Vice-Chair of the IST Board of Governors, the Director, the Principal/s, the school's designated Child Protection Officer, the HR Manager, and IST legal counsel. Representatives from other agencies may be invited to the discussion and could include representatives from health, social care agencies and police.

When creating the response team and in any communications the Director must ensure that any sensitivities around conflicts of interest are respected.

#### 5.6. Inquiry

The school normally conducts an inquiry into the allegation with the investigative committee agreed at the Strategy meeting. In very serious or complex and difficult cases, external professional investigators may be employed to conduct the inquiry.

The following definitions should be used when determining the outcome of the inquiry:

- *Substantiated: there is sufficient evidence to prove the allegation*
- *Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive*

- *False: there is sufficient evidence to disprove the allegation*
- *Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.*

## 5.7. Supporting those involved

### The person(s) who makes the allegation and their parents/caretakers

Parents and caregivers will be notified if their child makes or is involved in an allegation if they do not already know. A young person over the age of 18 is entitled to insist that his/her parents are not informed, provided the police are not involved, however this should always be a matter of discussion by the school with the young person. If the police or social services (if these services exist locally) are to be involved, they will be contacted first and will advise as to what information may or may not be disclosed to the parents. There will be a staff member designated to the role of liaising with the parents and child about the case and ensuring that they are fully informed as far as is possible. Parents and caregivers will be made aware of any progress in the inquiry, and where there is no criminal prosecution, the outcome will be explained to them. This may be a disciplinary outcome. During a disciplinary hearing the deliberations and information used for making decisions are usually confidential, but parents will be told the outcome.

- *External agencies and the police may be involved and will provide the school with advice on what type of additional support the child may need.*
- *Any staff member or adult raising an allegation can be assured that this will be treated in confidence.*

### The Employee

IST has a duty of care to its employees and will ensure that there is a fair and complete investigative process. The person who is the subject of the inquiry will be informed as soon as possible and usually after the initial discussion with the Director. The employee will then be advised on what the next course of action will be. However, if the police or social services are to be involved, they will be contacted before the employee, and will advise as to what information may be disclosed to the person under inquiry.

A named member of staff, who will normally be the non-investigating principal, will keep the employee informed of the progress of the case and any other work-related issues.

The employee may need additional support and the school will consider what might be appropriate to best accommodate this. If it is a criminal investigation and the police are involved, they may provide this additional support. The employee also has recourse through the school's 'Staff Complaints and Grievances' protocol.

## 5.8. Confidentiality

The school will make every effort to guard the privacy of all parties during and after an inquiry into an allegation. It is in everyone's best interest to maintain this confidentiality to ensure a fair inquiry with minimum impact for all parties.

***A breach of confidentiality will be taken seriously and may warrant its own inquiry.***

## 5.9. Resignations

If an employee resigns when the allegation is made against them or during an inquiry, the inquiry will continue until an outcome has been reached, with or without the employee's cooperation. They will be given full opportunity to answer the allegation.

## 5.10. Record Keeping

A record of all concerns and allegations, including concerns which are considered to be comparatively insignificant, will be kept in separate files within a safe in the Director's Office. Only the Director and his or her deputy will have the combination or key to the safe.

Where an allegation is found to be malicious, it will be removed from the record of the employee concerned and all records destroyed.

For all other allegations, records of inquiries and outcomes will be kept in the Director's safe. The record will be kept indefinitely, including for people who leave the organization, at least from the date of the allegation.

## 5.11. Action on conclusion of the case

On conclusion of an inquiry the Director will call a further meeting. The membership of this meeting will normally be the same as that of the Strategy Meeting.

A prescribed agenda for this meeting is found at Appendix B.

The purpose of this meeting is:

1. *to make a final determination of the outcome of the Inquiry*
2. *to determine what disciplinary action, if any, is to take place*
3. *to consider any issues relating to referral to external agencies*

### **In the case of an unsubstantiated allegation:**

Where an allegation is proved to be false, the Director may seek external support or advice to determine whether the child needs support or has been abused by someone else.

If a person who is not a child has made the claim, the school may pass the information to the police who may take further action against that person.

If the case is unsubstantiated and it is decided that the employee may return to school after a suspension, provisions will be put in place by the school to ensure that the transition is as smooth as possible. This may involve a phased return for a trial period or the use of another member of staff as a support system in the short term. If the child who made the allegation is still at the school, the school will consider what needs to be done to manage the contact between employee and child.

### **In the case of a substantiated allegation:**

If the case is substantiated a decision will be made as to the next steps according to the IST Safeguarding Framework, Board of Governors Policy Manual and the legal context of the PRC.

### 5.12. After the case

No matter what the outcome is of an allegation of abuse against staff, the school will review the case to see if there are any improvements that can be made in its practice or policy that may help to deal with cases in the future.

## 6. Our School provides support processes for any employee that may be the subject of inquiries into misconduct or abuse.

### 6.1. Staff Complaints and Grievances: Guidelines

- |   |  |
|---|--|
| <p>a) Our school recognizes that at times opinions may differ regarding the implementation of school policies and procedures (including those related to the safeguarding of students) and that a transparent process must be available whereby parties can resolve such differences in an amicable way.</p> <p>b) Our school recognizes the right of all employees to file a grievance should they believe that school policy has been violated as stipulated in the Board Policy Manual, in the IST Safeguarding Framework, or the employee's written employment contract.</p> <p>c) We commit to attempting to resolve any grievance as quickly as possible and at the lowest supervisory level.</p> | <p>d) We accept that a grievance may not be made against the way school policies are carried out; the school's Administration has latitude in determining the way in which it implements school policies so long as their actions do not in effect contravene the policy in question.</p> <p>e) When a satisfactory solution cannot be reached informally, we agree the steps noted below shall be followed in order to reach a solution. The time limits noted may be adjusted by the mutual consent of the parties involved, but this must fall between the first and last days of the official school year. If a grievance arises late in the school year, all parties shall undertake to expedite the grievance procedure so that the grievance can be solved, if possible, before the end of the school year.</p> |
|---|--|

### Protocols Governing the Filing of Staff Grievances

- |  |   |
|--|---|
| <p>a) For a grievance to be accepted, it must be presented within 20 working days after the staff member was notified of the condition or action that is the basis of the grievance.</p> <p>b) Any steps in the process which the involved parties mutually agree are not necessary may be waived.</p> <p>c) If the complainant (the person filing the grievance) fails to meet the time limit at any step in the procedure the grievance shall be considered as waived, unless otherwise determined by the Director. If the Director fails to meet a time limit, then the claimant may proceed independently to the next step of the grievance procedure.</p> | <p>d) All parties may request the presence and assistance of third parties at any meeting provided for in the grievance procedure. All parties to the grievance shall have the right to question any participant who presents himself/herself at any meeting stipulated in the procedure. Any oral statements from third parties that are to be included as part of the official record of the case shall be taken only in the presence of the complainant.</p> <p>e) At no point in the handling of the grievance may the school's administration or board consider any statements or other material that may be against the interests of the complainant without his/her knowledge.</p> <p>f) The school's administration shall be charged with keeping an official record of all proceedings and documents. This record shall be available to the complainant for copying if he/she desires.</p> |
|--|---|

**TIMELINE****Step 1**

- a) *The employee who feels he/she has a grievance should present the grievance in writing to his/her immediate supervisor within 20 working days from notification of the condition or action that is the basis of the grievance.*
- b) *The statement should include a precise written statement indicating the nature of the grievance and the fact that the employee is commencing a formal grievance procedure.*
- c) *The statement should also identify the specific school policy or part thereof, or part of the written employment contract that the complainant believes has been violated, misapplied, or misinterpreted.*
- d) *In addition, the statement should suggest a remedy or proposal that could lead to resolving the matter.*

**Step 2**

- a) *The Director should schedule a meeting with the complainant within five (5) working days from receipt of the complainant's statement to discuss the grievance.*
- b) *The Director should render a written decision to the complainant regarding the grievance within five (5) working days of this meeting.*

**Step 3**

- a) *If the complainant feels the grievance is unresolved after Step Two, he/she may request in writing a formal hearing by the board within five (5) working days of the receipt of the Director's decision.*
- b) *Within fifteen (15) working days of receipt of the complainant's request, the board shall schedule a special session for the hearing of the grievance or place it on the agenda of the next regularly scheduled board meeting.*
- c) *The written grievance, as well as copies of all relevant documents, shall be supplied to the school board by the Director and complainant.*
- d) *At the end of the hearing, the complainant or his/her representative shall be the last one to submit a summation. After the hearing the board will meet without any parties involved in the grievance in order to arrive at a final decision.*
- e) *The board shall communicate its final decision in writing to the parties involved within ten (10) working days after the hearing. This shall include an explanation of the reason(s) for its decision, which shall be based solely on the matters contained in the official record.*
- f) *The board is responsible for keeping minutes of the hearing. All parties to the grievance have a right to keep a personal record during the hearing and shall receive a copy of the official record afterwards.*
- g) *The decision of the board is final and not subject to further appeal.*

**6.2. Workplace Harassment**

Our school is committed to creating and maintaining a positive school climate in which every person is treated with fairness and dignity. In supporting this commitment, the school does not tolerate harassment of any kind or form. Those found in violation of the policy are subject to disciplinary action.

Our school defines harassment as any unwelcome conduct, whether sexual, physical or verbal, or subtle or overt, when

- |   |   |   |
|---|---|---|
| a) <i>Submission to such conduct is made, either explicitly or implicitly, a term or condition of employment or is used as the basis for employment decisions, or</i> | b) <i>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.</i> | c) <i>Harassment is not limited by the gender of either party, nor by superior-subordinate relationships.</i> |
|---|---|---|

**Filing of a Harassment Complaint**

Employees who feel that they have been subjected to harassment, whether by employees or non-employees, should report such conduct to their supervisor, human resource manager, principal or Director.

An inquiry will be conducted whenever the appropriate member of management or administration is made aware of such allegations and timely and appropriate corrective action will be taken. The affected employee can lodge a complaint without fear of reprisal or retaliation.

### **Guidelines for Harassment Inquiries**

Once a complaint of harassment is received, the supervisor, or administrator should advise the complainant that an inquiry will be conducted, as confidentially as possible, once specifics of the complaint have been determined. The complainant will be encouraged to provide an account in writing of the alleged harassment, detailing the information in clauses 1 and 2 below. Initially, the manager, with another member of the administration present (if necessary, a supervisor or administrator of the same sex as the complainant), should determine the following:

- a) *the specifics of the alleged harassment (e.g., frequency, location, duration, circumstances in which it occurred, witnesses to the event(s), etc.);*
- b) *the steps taken by the complainant to address or alleviate the alleged conduct; and*
- c) *whether the complaint falls within the harassment policy or may require some other type of managerial action.*

The Director and the human resource manager must be notified of any complaint of harassment. At all stages of the process, the investigator must document the steps taken. Once the specifics of the allegation have been determined, the manager should assure the complainant that the complaint will be taken seriously and that confidentiality will be maintained to the extent possible. The complainant should be reminded not to breach this confidentiality or to take any retaliatory action of his or her own. The complainant should also be reminded that the policy prohibits retaliation for filing a complaint, and that he/she should notify the human resource manager or Administration if retaliation occurs.

### **Inquiry**

The alleged harasser and witnesses identified by either party should be interviewed and provided an opportunity to present information. The alleged harasser and witnesses should be reminded that the policy prohibits retaliation of any kind for the filing of a complaint. Inquiries should be conducted as promptly as possible but should be concluded within thirty (30) days after the initial complaint.

### **Disciplinary Action**

If an inquiry supports the fact that a violation of the harassment policy has occurred, disciplinary action may include one or more of the following, depending on the nature and severity of the harassment:

- a) *oral warning notice;*
- b) *written warning notice;*
- c) *transfer, demotion, and/or period of close supervision;*
- d) *termination of contract at completion; and/or*
- e) *immediate termination in accordance with the contract.*

The complainant should be advised that the inquiry has been completed and that disciplinary action has been taken, without specifying the nature of the action.

If it is determined that a violation of the harassment policy did not occur, the human resource manager or Administration will remind both parties of the prohibition of retaliation and provide employee counseling as needed.