

**CHILD PROTECTION PLAN  
WORTHINGTON CHRISTIAN SCHOOL  
WORTHINGTON, OHIO  
Adopted: May 7, 2008**

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## I. INTRODUCTION

Worthington Christian School ("WC" or "School") is committed to its duty of the protection and safety of children. This commitment follows the fundamental mission of WC to instruct students in a biblical worldview, to give authentic witness to the teaching of the Scriptures, and to uphold the human dignity of every person. WC is fully resolved to use every effort to prevent the occurrence of any acts of abuse within the School and to confront any act of abuse immediately and forthrightly. The policy listed within this document will guide the schools' response to allegations of sexual abuse against school personnel. We believe this is our duty as followers of Christ. (Psalm 140:1, 103:6)

To more fully carry out this mission, WC has adopted this Child Protection Plan (referred to as the "Plan"). As one publication has noted:

"[Schools] need to develop a premeditated plan or strategy to respond to sexual abuse allegations. An effective response strategy recognizes the following underlying principles:

1. All allegations need to be taken seriously.
2. Situations must be handled forthrightly with due respect for people's privacy and confidentiality.
3. Immediate notification should be given to the school's insurance carrier and attorney.
4. Full cooperation must be given to civil authorities under the guidance of the school's attorney.
5. Adequate care must be shown for the well-being of victims and their families."

The provisions of this Plan are adopted to fulfill the commitment of WCS to the protection and safety of children. In addition to the provisions of this Plan, the standards for behavior of staff, employees and others are subject to other mandates, guidelines and civil law which retain the force proper to each. Matters which may be more fully treated elsewhere or are determined by other Biblical direction or School policies or civil law are not repeated in this Plan.

## II. DEFINITIONS

For purposes of implementing this Plan, the following definitions apply:

- A. "Advisory Team" means the WC Advisory Team, or such other governing board as may be established to oversee WC.
- B. "Intake Coordinator" means the Head of School, except in any case where a claim may involve the Superintendent, in which case Intake Coordinator means the Head of School's immediate supervisor.
- C. A "Minor" is any person enrolled at WC or any person under the age of 18 at the time an act of sexual abuse occurs, or a mentally or physically handicapped child under age 21.
- D. "School Personnel" subject to this Plan shall be any employee or volunteer authorized by the School to have care, custody, or control of a Minor, and having responsibility for the care, control or custody of a Minor when an act of sexual abuse of that Minor occurred.
- E. "Head of School" means the chief officer of WC.

- F. "Mandatory Reporter" means a reporter subject to Ohio Rev. Code Section 2151.421(A)(1)
- G. "Civil authorities" means the county children's service agency or a county or municipal peace officer in the county in which the child resides or in which the abuse is occurring or has occurred.

### III. ORGANIZATIONAL MATTERS

1. The Head of School shall be responsible for the administration of the Plan and its policies.
2. A Child Protection Committee (the "CPC") is hereby established by WCS to function as a confidential consultative body to assist the Head of School in discharging the procedures describes herein. The CPC shall be governed by the policies outlined in Articles V through XII of this plan. The actions of the CPC are to assist in the protection of children in the School, and are taken as part of the internal administration of the disciplinary process of the School. The CPC will assist the School by:
  - Determining whether claims of sexual abuse of Minors by School Personnel require reporting to civil authorities if School Personnel have not already reported the allegations to civil authorities; and
  - Making determinations concerning fitness for continued service and other recommended courses of action in regards to School Personnel who have been accused of sexual abuse of a Minor; and
  - Reviewing the policies and procedures of the School for dealing with allegations of sexual abuse of Minors at least every three years so as to recommend to the School any appropriate modifications to this Plan.
3. The Staff-Student Relationship Guidelines (the "Guidelines") set forth in Appendix 3, which have been adopted by the School, are incorporated as part of this Plan. These Guidelines will be provided to each administrator, teacher, employee and volunteer (who has interaction with minors) at WC. These Guidelines may be reviewed and revised periodically by WC, and any such revised Guidelines will be considered part of this Plan.
4. The Restrictions on Identified Sex Offenders set forth in Article VII of this Plan will be applied by the CPC and carried out by the Head of School as it considers cases brought before it. These Restrictions may be reviewed and revised periodically by WC, and any such revised Restrictions will be considered part of this Plan.
5. A competent person will be designated by the Head of School to coordinate assistance for the immediate pastoral care of persons who claim to have been abused when he/she was a Minor by School Personnel. It will be the responsibility of this person to assist with the provision of counseling, spiritual assistance and other social services to the abused persons who seek such advice.
6. The Plan will be provided to each WC employee and will be made available to the community on the School web site.

#### IV. FLOW OF RESPONSE TO A CLAIM OF ABUSE

See Appendix 1.

## V. INITIATION OF AND RESPONSE TO A CLAIM OF ABUSE BY SCHOOL PERSONNEL

An allegation of sexual abuse of a Minor by School Personnel may be initiated in various ways, including the filing of a complaint form (see Appendix 2), direct contact with a teacher, counselor or School Personnel by the party alleging sexual abuse or a family member thereof, or by a claim presented in a civil law action. The allegations may be by or for a specified identified claimant. Allegations cannot be made under condition of anonymity.

The following actions shall be taken immediately upon receipt of any such allegation, regardless of who presents the allegation or how the allegation is received:

- A. The allegation shall immediately be referred to the Intake Coordinator (the "IC"). Any subordinate person in the School who receives such an allegation, in whatever manner shall promptly forward it to the IC. If the allegation is received in the form of a civil action, the School's counsel shall immediately be notified and shall take appropriate action to respond to the civil claim.
- B. A preliminary evaluation of the allegation will be initiated by the IC and, if applicable, School Personnel who brought the allegation to the IC, and conducted promptly and objectively to determine if there is reasonable cause to suspect sexual abuse. If it has not already been prepared, the IC shall obtain a completed claim form (see Appendix 2) from the accuser (or parent if the accuser is still a Minor).
- C. If the allegation does not show reasonable cause to suspect sexual abuse (for example, if it lacks specificity, is irreconcilable with known facts, or cannot be deciphered), the IC will inform the CPC of his/her judgment on the claim. The CPC will then determine whether it needs to investigate. If the CPC agrees with the IC that the claim does not show reasonable cause to suspect sexual abuse, nothing further will be done and the claimant and the accused will be so notified. All appropriate action to clear the name of the accused will be taken. The claimant and any other Mandatory Reporter who disagrees with this determination will retain the right, and perhaps the obligation, to report the claim to civil authorities. All claims should be taken seriously and handled with due respect.

If the CPC believes the claim shows reasonable cause to suspect sexual abuse and requires reporting under applicable law, it will immediately direct the IC and any other Mandatory Reporter aware of the allegation jointly to report the claim to civil authorities. The IC will notify the claimant and the accused of the action to be taken.

- D. If the Intake Coordinator determines the allegation shows reasonable cause to suspect sexual abuse, the following actions will be taken:
  1. If the matter is something which requires reporting pursuant to applicable law, the IC and any other Mandatory Reporter aware of the allegations shall immediately and jointly report the claim to civil authorities. The claimant shall be advised of the claimant's right also to report the allegations to the civil authorities if the claimant has not previously reported. The School will cooperate with any civil or criminal investigation as required by law.
  2. The IC will immediately contact the CPC, which will be no later than 48 hours of the filing of the claim. With the claim already reported to civil

authorities, the CPC will determine what action by the School will be taken in regards to the accused.

3. At any time, the person designated by the Head of School to coordinate the pastoral care of the victims will determine the appropriate actions for healing and reconciliation with the claimant and the claimant's family. The actions may include provision of counseling, spiritual and/or pastoral assistance and other social services available and agreed to by the claimant and the School. The Senior Pastor of Grace Polaris (GP), Ohio or his representative will offer to meet with the accuser and the accuser's family in recognition of a sincere commitment to the spiritual and emotional wellbeing of the accuser and the accuser's family.
4. Care must be taken lest anyone's good name be endangered by any preliminary investigation. Appropriate information as to the facts involved in the allegations as determined by the IC or the CPC shall be communicated to the public pursuant to the communications policy found in Article VIII, Section F.

E. As part of its proceedings, the CPC shall consider the following additional guidelines:

1. The CPC shall always listen to relevant facts and be sensitive to avoid any level of communication or fact finding-either with the alleged victim, the alleged perpetrator, or their families-that might compromise any later investigation by legal authorities. The relevant facts include the identities and places of residence of the alleged victim and perpetrator; the nature, place, time, and frequency of the alleged misconduct; and any other information such as witnesses, confessions, or medical evidence. If the allegation is brought by a Minor, the CPC shall listen to relevant facts and shall immediately inform the reporting Minor's parents, unless they are an alleged perpetrator.
2. The CPC should normally not approach the alleged perpetrator. However, if any action of banning from School property or placing on administrative leave is taken, the alleged perpetrator (or his/her parents for a Minor) shall immediately be informed of this action.
3. Pastoral-penitent privilege may not apply in the case of child abuse, and so the CPC shall listen to relevant facts with that understanding.
4. The CPC shall maintain close contact with the School's attorney for legal counsel throughout the fact finding and, if deemed necessary, reporting steps.
5. All contacts with the person bringing an allegation, the alleged victim, or the victim's parents should contain assurances of the School's support and commitment to its Child Protection Plan.

## VI. PROTOCOLS CONCERNING ACTIONS REGARDING AN ALLEGED PERPETRATOR

If a criminal charge of alleged abuse of a Minor by School Personnel has been filed by the appropriate civil authority, so long as the criminal case is pending, the CPC shall

recommend safeguards and procedures. This is to include placement of the alleged perpetrator on immediate administrative leave, and also may include a recommendation that the alleged perpetrator be banned from School property during school hours and School-sponsored or School-related events or other action that would be implemented if Article VII is applicable. A no-trespass order is never to be made lightly and such an action is never to be confused with or replace the Church's spiritual responsibility concerning ecclesiastical Church discipline. However, in the circumstance of accusations of child abuse, it is the Christian duty of both WC and the alleged perpetrator(s) to be concerned for the physical, mental, and spiritual well-being of the alleged child victim(s) first [Mark 12:28-31; and Matthew 19:13-15]. Love for our neighbor and care for our children demand that an alleged perpetrator not be the occasion of further distress to an alleged Minor victim, even before the facts and merits of the case are settled in a formal criminal proceeding. Alleged perpetrators who are found to be innocent may, under appropriate circumstances, have restrictions lifted and full exoneration made.

If the alleged perpetrator is convicted, WC will implement the policy established regarding convicted or admitted offenders found in Article VII.

If the authorities dismiss the criminal case or do not convict for insufficient or inconclusive evidence, the CPC may still recommend that restrictions on the accused School Personnel stand based on information it has, because the standard of evidence for such action may be less stringent than that which is involved in a criminal proceeding.

If the accused has not admitted, been charged, or been convicted of criminal sexual misconduct, there may still exist a situation in which the CPC deems it necessary to recommend some restrictions or sanctions upon a person accused of sexual abuse of a Minor if such action is in the best interest of the students and School community. The CPC will consider the facts and circumstances of each case and shall make any recommendation it deems appropriate to the Head of School, or his/her supervisor.

Any action of banning from the property or termination of employment shall be taken only after consultation with counsel for the School.

## VII. RESTRICTIONS ON IDENTIFIED SEX OFFENDERS

This policy is to apply to the following individuals:

- A. Registered sex offenders.
- B. Individuals who have been convicted of an offense against a Minor.
- C. Individuals who have admitted to conduct which would be a criminal offense against minors.

The intent of this policy is primarily to provide appropriate protection for students enrolled at WCS. This policy attempts to balance the offender's ability to participate meaningfully in their own child's educational experience and spiritual life, while providing reasonable accountability and protection to all of the children entrusted to the care of WC.

1. WCS will not employ nor continue to employ any person who has admitted to or been convicted of criminal sexual misconduct.

2. Offenders are not permitted on School grounds during School hours except for occasions arranged in advance with a building principal and requires an escort at all times by the principal, a teacher, or an adult designated by a principal or principal's designee.
3. All public services and activities of the School are open for attendance. However, if contact with Minors is possible during any of these times, then there must be an adult escort approved by the building principal. This includes the use of public restrooms. Examples of such activities would include, but are not limited to: athletic events, graduation ceremonies, concerts, and drama productions.
4. Individuals who are parents or guardians of a student may pick up or drop off their own children but may not enter the School building without making arrangements with the building principal ahead of time that are subject to item 2 listed above.
5. Each offender will be asked to meet with a member of the CPC and either a pastor or building principal to review the restrictions. They will sign an agreement that (a) outlines the restrictions, (b) includes an acknowledgement that they have been made aware of these restrictions, (c) specifies that GP and School administrators may notify any and all persons that they deem necessary to be informed of the person's background and (d) affirms the individual's willingness to abide by these restrictions.
6. Based on the nature of the legal restrictions and terms of probation or parole for the individual, the CPC may add additional restrictions as deemed necessary. These restrictions cannot reduce any court-imposed requirements.
7. In some cases, the CPC may require the individual to have regular contact with an assigned mentor.
8. Failure to abide by the agreed upon restrictions may result in the CPC restricting the individual from all School-sponsored activities.
9. The duration of these restrictions or any modifications upon these restrictions will be made by the CPC with a report made to the Head of School and GP Senior Pastor.
10. Specific questions on this policy and its interpretation are to be directed to the CPC.

## VIII. SCHOOL RESPONSIBILITIES

WCS will undertake the following matters:

### A. Application for Employment or Volunteers

All applicants for a staff position at WC shall include references and grant permission to conduct BCII and FBI background checks. Written notes shall be kept on each reference check and, if the applicant is hired, kept in the employee's file.

WC will receive applications from all potential staff and review those applications, conduct interviews, check references, and review the results of BCII and FBI background checks. Volunteers who will be working in positions identified as having direct independent contact with students shall undergo a social security number background check as well.

All employees shall re-submit to BCII and FBI background checks every five years. Licensed faculty shall complete this as part of their license renewal. All other staff, included contracted workers, shall complete this according to a five-year cycle set up by the school.

Failure to either complete or be truthful on the application and permissions to check references and conduct background checks shall be grounds for dismissal or declining to appoint.

Any application or employee whose background check indicates any disqualifying conviction as identified in Ohio Revised Code section 3319.39 will be terminated or not appointed. Additionally, any employee or applicant who admits to such a crime without a conviction will be terminated or not appointed.

### B. Retaining Records

WCS will retain appropriate records arising from this Plan both securely and confidentially.

All applications, screening materials, or investigative files shall be held in a secure and confidential location. To the maximum extent possible, WC and the CPC are to document and retain complete records of any claim related to alleged sexual abuse of a Minor.

### C. Training

All employees shall receive training on the identification and prevention of sexual abuse of Minors and their mandatory reporting requirements. Staff and volunteers shall each receive copies of and training on the WC Staff-Student Relationship Guidelines found in Appendix 3.

### D. Reporting

WC will promptly report to appropriate civil authorities where required or appropriate. The requirement for reporting to legal authorities is based on Ohio Revised Code section 2151.421, in which a mandatory reporter acting in a  
Child Protection Policy (1)

professional or official capacity knows of or has reasonable cause to suspect abuse of a child. WC will also consult with the School's attorney with respect to other required or suggested actions.

If there is reasonable cause to suspect allegations of sexual abuse of a Minor may be true, WC shall urge the person bringing the allegation – either the alleged victim's parents, another individual, or a self-confessing perpetrator - also to report the allegations to civil authorities.

E. Self-Reporting

In the event a current employee of WC comes under review, arrest and/or conviction by a civil authority, the employee must inform their immediate supervisor of the action. It is the employee's responsibility to provide necessary information and documentation about the on-going event within 72 hours.

F. Requests for Information

WC will identify a person to serve as the focal point for responding to requests for information from members of the School community or from the media.

While an investigation is pending, no information concerning the identity of an alleged victim or the alleged circumstances of the event shall be shared with the School community, except for members of the CPC and School administration, to protect the privacy rights of all involved and not to impede any civil authorities' actions. Only if such information becomes public knowledge from other sources shall WC consider responding selectively to requests for information, and then only if there is a legitimate need to know.

For any alleged incident that is deemed reportable, if appropriate, the CPC may recommend other appropriate steps, which may include an announcement to be made first to the WC Advisory Team and GP Board of Elders and then to the School community and Church congregation that there has been an allegation of child abuse and any actions which have been taken as a result thereof.

If the case becomes known to the media, WCS will respond to inquiries by reinforcing the existence of the Child Protection Plan, stating our institutional concern to protect the children of the School, confirming our cooperation with investigating authorities, but releasing only such information as is approved by the School's attorney and is consistent with the communications policy set forth here.

If criminal charges are filed or a conviction occurs, the Head of School shall consult with the CPC about other public comments or statements.

## IX. OPERATING PROCEDURES FOR THE CHILD PROTECTION COMMITTEE

### A. Formation

The CPC shall consist of at least five members, the majority of which will be members of the Grace Polaris of Columbus, Ohio, not in the employ of, or related to the employees of, GP or WCS. At least two members of the CPC shall be females, and at least one member shall have expertise in the treatment of sexual abuse of Minors.

The initial members of the CPC shall be appointed by the WCS Advisory Team to terms of staggered length. One member shall be appointed to a one-year term, one to a two year, one to a three-year term, one to a four-year term, and one to a five-year term. All terms after the initial appointment shall be five years in length. In the event of an open position on the CPC, the remaining members of the committee shall nominate a replacement member. The nomination shall be presented to the Advisory Team, and upon approval by the Advisory Team, the nominee shall become a member of the CPC.

### B. Operating Procedures

1. The members of the CPC shall annually elect a member to be Chairperson and a member to be Secretary. The Chairperson shall act as spokesperson for the CPC, and the Secretary shall maintain the records of the CPC. Members are eligible for reelection to these positions without limitation. The Chairperson shall preside over the meetings of the CPC, and if the Chairperson is not present, the Secretary shall preside over the meeting. If neither officer is present, the members present shall elect a member to preside over the meeting, and a member to maintain the records of the meeting. A quorum shall consist of at least 50% of the membership.
2. The CPC may adopt any operating rules which the members determine appropriate for the conduct of business. It is anticipated that the deliberation of matters before the CPC will be primarily and preferentially by discussion, and that actions of the CPC will be taken by consensus of the members. If consensus is not reached, a matter presented to the CPC may be decided by vote, with each member having one vote, and a majority of the votes of the members present shall control. The actions taken by the CPC shall be formalized in minutes which shall be prepared under authority of the Secretary, and signed by the Secretary.
3. All deliberations and actions taken by the CPC shall be confidential. The minutes and records of the CPC shall remain in a locked storage area at the School designated by the Head of School. A disclosure of any information shall be made solely to the IC. If the CPC desires or recommends further disclosure of any matters, the CPC shall advise the IC as to the matter the CPC wishes to disclose and the method of disclosure. The IC and the CPC review and discuss information prior to disclosure. Within the confines of law and the Plan, and of respect for the privacy and the reputation of the individuals involved, the CPC will deal as openly as possible with members of the School and Church.

## X. PROCEDURES FOR ASSISTANCE IN ASSESSING ALLEGATIONS

When an allegation is referred to the CPC according to the procedures detailed in Articles V and VI, the following procedures will be observed.

- A. The Secretary of the CPC will call a meeting of the CPC to be held by the end of the next calendar day. The Intake Coordinator or his/her representative shall present to the CPC the allegations, and all the materials received and considered by the Intake Coordinator. The Intake Coordinator shall personally attend the meeting of the CPC to discuss the allegations. If the IC has already determined that the allegations should not be reported to civil authorities, the CPC will determine whether they are in agreement with that judgment. If the IC or other Mandatory Reporters have already reported the claim to civil authorities, the CPC will determine what kind of actions should be taken in regards to the School Personnel who have been subject to the report.
- B. The information presented to the CPC must include a completed claim form and may include and written statements presented by the alleged victim, and any statements by the School Personnel involved.
- C. The CPC may request information in addition to the information presented by the Intake Coordinator. The additional information may consist of written materials or statements, and may include a personal appearance by the alleged victim or the School Personnel involved, if the CPC determines such a personal appearance would be appropriate.
- D. After receipt of all information determined necessary by the CPC, the CPC will prepare a written determination to the Intake Coordinator stating the determination of the CPC as to the allegations presented. The CPC shall present its determination regarding reporting obligations to the Intake Coordinator within 24 hours of their initial meeting. The CPC shall present any other determinations pertaining to the accused School Personnel or the claim of sexual abuse within three business days of any such determinations.
- E. The determinations of the CPC and any resulting actions shall be promptly communicated to the alleged victim and to the School Personnel involved.

## XI. REVIEW OF POLICIES AND PROCEDURES

The Plan provides that a printed form will be available on the website for use in presenting an allegation of sexual abuse. The written form must be completed and provided to the IC and CPC at the outset of any investigation or assessment of a claim by the IC or CPC.

The existence and location of the complaint form shall be a part of periodic public announcements so that the public will be aware of the procedure to make allegations of abuse of Minors.

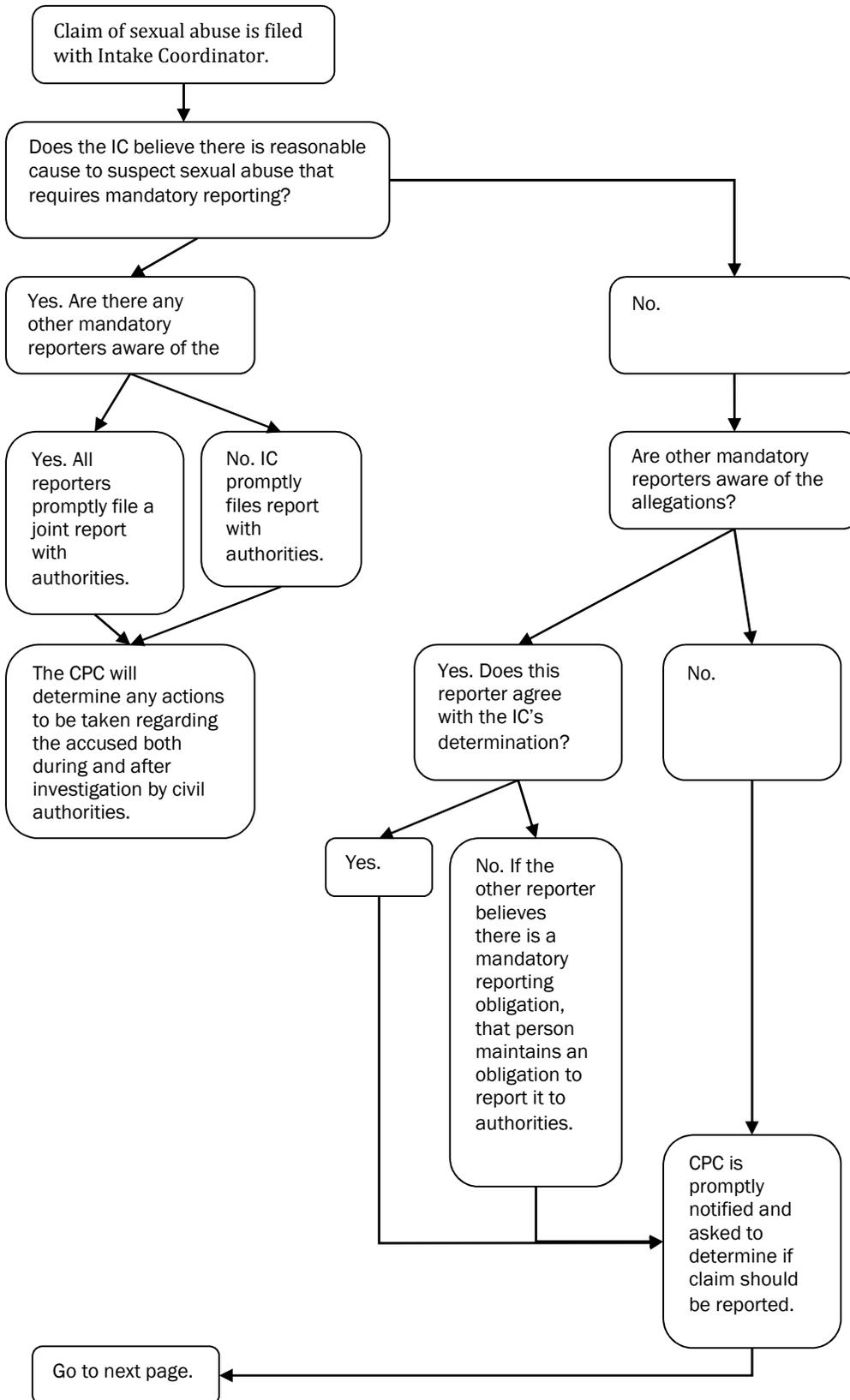
The abuse policies and procedures of the School shall be subject to review and modification by the School, if appropriate or necessary. Any proposed amendments shall be presented to the CPC for consideration prior to adoption by the School, and the CPC shall provide the School with any comments as to the proposed amendments.

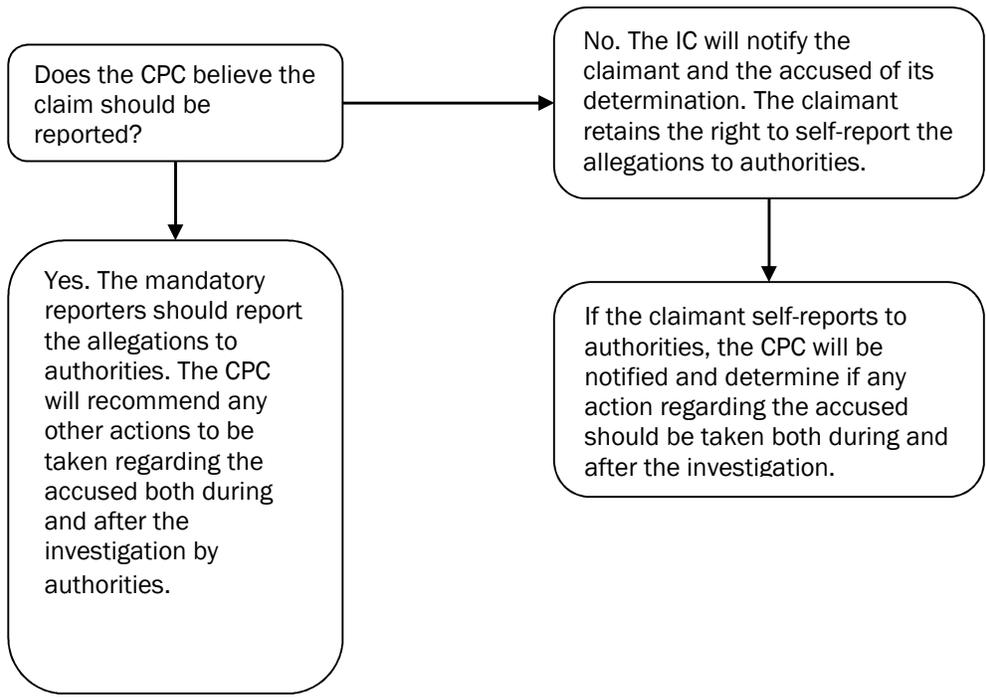
The CPC shall make a full review of the current policies and procedures of the School at least once in each three-year calendar period. The CPC shall recommend to the School any modifications which the CPC determines to be appropriate to ensure that the policies and procedures are in full compliance with the Plan and provide for the protection of Minors within the spirit and letter of the Plan. The CPC shall present to the Head of School any recommendations for changes in the policies and procedures.

## XII. PROVIDING ADDITIONAL ADVICE OR RESPONSES

In addition to those actions described above, the CPC may provide any other advice to the Head of School or the School as to sexual abuse of Minors as requested by the Head of School or the School, or as determined to be appropriate by the CPC. This advice or response may be applied retrospectively or prospectively. The CPC may also offer assistance in the cooperation with other churches, religious bodies, institutions of learning and other interested organizations in conducting research in the area of sexual abuse of Minors.

APPENDIX 1





APPENDIX 2

WORTHINGTON CHRISTIAN SCHOOLS  
COMPLAINT FOR ALLEGATIONS  
OF SEXUAL ABUSE OF A MINOR

I. INFORMATION AS TO MINOR

Full Name: \_\_\_\_\_

Address: \_\_\_\_\_

Date of Birth: \_\_\_\_\_

Name and Address of Parent(s) or Guardian:

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone No.: \_\_\_\_\_

School campus attended: ES \_\_\_\_\_ MS \_\_\_\_\_ HS \_\_\_\_\_

II. INFORMATION AS TO ACCUSED

Name: \_\_\_\_\_

Position: \_\_\_\_\_ Staff \_\_\_\_\_ Employee \_\_\_\_\_ Volunteer

Name and Address of place of employment: \_\_\_\_\_

Has accused been confronted or informed of allegation? \_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, when and by whom: \_\_\_\_\_

III. INFORMATION AS TO ALLEGATIONS

Brief description of alleged abuse (time, place and acts): \_\_\_\_\_

Have the allegations been reported to any civil authorities or Church personnel?

\_\_\_\_\_

If yes, when, how and to whom:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Date of Report

\_\_\_\_\_

Signature of Person Reporting

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone: \_\_\_\_\_

## APPENDIX 3

### STAFF-STUDENT RELATIONSHIP GUIDELINES

The Ohio Principles of Professional Conduct outlines standards of honesty and integrity to which every teacher in Ohio, including those at Worthington Christian, is expected to adhere. As a school committed to biblical principles, WC would like to further define what a healthy and biblical staff-student relationship looks like and what the staff person's role is within that relationship.

This relationship is a vital one. When Jesus claims that a student is fully trained when he is like his teacher (Luke 6:40), He speaks to its significance. We believe that our educational ministry to our students and the relationships contained within it are strengthened, not weakened, by these practices.

This is a broad statement of what healthy relationships ought to look like, limited by specific boundaries. It is not an exhaustive statement nor does it address every possible situation. Staff members will need to use common sense and wise judgment in applying the spirit of these guidelines in situations not specifically addressed.

The kinds of things that will define a healthy teacher-student relationship in our school include:

- Academic pursuit
- Discipleship and nurturing
- Professionalism
- Mentorship rather than peerage
- Rightful authority
- Community
- Parental involvement
- Honor and respect
- Reasonable boundaries

The following boundaries are limiting features of this relationship. Although some of the actions these limitations prohibit are not inherently wrong, we have judged them to be imprudent and therefore should be avoided. (1 Corinthians 6:12) The general intent of the guidelines is that staff contact with student should take place in public areas unless other people are present.

#### 1. Definitions

- 1.1. Public area: any area where the expectation is that anyone could view the parties in those areas from locations outside of those areas; or an enclosed area that is occupied by multiple people.
  - 1.1.1. Examples of public areas: any area such as a classroom or an office in which an individual is viewable through an open door or window; a library, a gymnasium, a commons area or hallway, a playing field outdoors, or a similar area outside of school grounds; a locker room occupied by a coach and multiple students from his/her team.
  - 1.1.2. Examples of private (non-public) areas: Any of the following areas if the only occupants are a staff person and a single student: locker rooms, offices without a window; areas of a classroom not viewable from a hallway.

- 1.2. Mentorship/Discipleship: The process of transmitting wisdom and other virtues from one person to another. These may be one-on-one relationships but they should always be gender-based; i.e. male staff person to male student or female staff person to female student. Such a relationship should always have a deeper level of parental knowledge and involvement as the mentor relationship grows.
  - 1.3. School related activities: School sponsored activities including scheduled class periods, field trips, extracurricular activities, school sponsored Bible studies or prayer groups, or normal tutoring activities that take place within the realm of the regular classroom instruction.
  - 1.4. Non-school related activities: Activities involving staff persons and students but not officially sponsored by the school including Sunday School classes or other church activity, personal activities involving families of both parties, or private tutoring or instruction.
  - 1.5. Prior permission: Either a written or verbal consent on the part of a person to approve of a particular activity taking place. Written consent is typically recommended but a verbal consent is acceptable when deemed appropriate.
  - 1.6. Adult: an individual over the age of 18 and graduated from high school.
2. Contact within school hours
    - 2.1. Contact within school should always demonstrate the values listed in the introduction.
    - 2.2. Such contact should always occur in a public area.
    - 2.3. A staff-student lunch or other activity within school hours but outside the school grounds must always:
      - Take place in a public area.
      - Consist of a group of at least two students.
      - Have the prior permission of each student's parent.
3. School related contact outside of school hours
    - 3.1. Contact during school related activities outside of school hours should always demonstrate the values listed in the introduction.
    - 3.2. Staff contact with students should always occur in a public area even if the contact is not on school grounds.
    - 3.3. Such activities should have school administrative approval and prior parental permission. Parents and administrators should be notified of the specific activity and its frequency.
    - 3.4. Caution and wisdom should be used by the staff person when using phone calls, emails and other electronic communication as a form of communication with students. When possible, the staff person shall first receive permission from a student's parent to conduct such communication. If that does not occur, then the communication should also be directed to the parent (i.e. copy them on an email). Such communication should always demonstrate high standards of professionalism and ethics. All communication with students should be free from inappropriate sexual content or innuendo.
    - 3.5. Transportation of a student or students by a staff member (i.e. home from school or practice) requires the prior permission of the student's parent. Caution should be exercised by the staff person and, if possible, this should be done with at least one other person in the vehicle.

4. Non-school related contact outside of school hours
  - 4.1. It is recommended that staff follow the same guidelines for non-school related contact as listed in section 3.
5. Coaching
  - 5.1. Any coach to student-athlete contact should demonstrate the values listed in the introduction.
  - 5.2. Coaches should always meet with student-athletes in a public area. This includes all times before, during and after practices and games.
  - 5.3. If the gender of the coach is different than the gender of the student-athletes, any contact in a locker room or private area must be in the presence of another adult of the same gender as the student-athletes.
6. Physical contact
  - 6.1. Physical contact with a student should occur only when a) completely nonsexual and otherwise appropriate, and b) never in private.
7. Health Services
  - 7.1. The nature of the school nurse position and privacy statutes which govern the practice of nursing may require that the school nurse be exempted at times from these guidelines. The exemptions may take place when, in the professional judgment of the nurse, it is necessary to provide appropriate and professional health care to the student.

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