



Child Maltreatment and Mandated Reporting Policy

Section 1: Introduction

- 1.1 Policy Statement:** Worthington Christian School (Worthington Christian) is committed to its duty of the protection and safety of children. This commitment follows the fundamental mission of WCS 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. Worthington Christian 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 child abuse and maltreatment. We believe this is our duty as followers of Christ (Psalm 140:1, 103:6).
- 1.2 Purpose:** The provisions of this policy are adopted to fulfill the commitment of Worthington Christian to the protection and safety of children. In addition to the provisions of this plan, the standards for behavior of 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, school policies, or civil law are not repeated in this policy.

Section 2: Definitions

- 2.1 Child Maltreatment** is any "act or failure to act on the part of a parent or caretaker which results in death, serious physical or emotional harm, sexual abuse or exploitation," or "an act or failure to act which presents an imminent risk of serious harm." ([Child Abuse Prevention and Treatment Act](#)) Child maltreatment can be in the form of physical abuse, emotional abuse, sexual abuse, dependency, or neglect.
- 2.2 Physical Abuse** is evidence of any physical or mental injury or death, inflicted other than by accidental means resulting in cuts, bruises, or abrasions to areas of the body other than the buttocks, arms, and legs, or an injury or death in which there is a variance in the history given. Corporal punishment or other physical discipline by a parent, guardian, or custodian shall not be considered physical abuse except when injury occurs to a sensitive area of the body (area other than arms, buttocks and legs), injury requires medical attention, injury is widespread or excessive, or there is evidence of excessive discipline. Excessive discipline is discipline that is inappropriate to the age of the child; inconsistent, arbitrary, and designed not to educate, but to instill fear; the result of

unreasonable expectations or demands on the child, and/or caretaker loses control during discipline.

- 2.3 Neglect** is when a child lacks adequate parental care because of the faults or habits of the child's parent, guardian, or custodian. Neglect occurs when any of the following conditions occur: a child whose parent, guardian, or custodian neglects the child or refuses to provide proper or necessary food, shelter, education, medical or surgical care or treatment, or other care necessary for the child's health, morals, or well-being. ([Ohio Revised Code 2151.03](#))
- 2.4 Sexual Abuse** is any sexual contact or conduct between a child under eighteen years of age or a child with a developmental disability or physical impairment under the age of twenty-one years of age with an adult who is the victim's parent, guardian, custodian, person acting in loco parentis, teacher, administrator, coach, school employee, pastor, or other adult in authority over the child.
- 2.5 Sexual Contact** means any touching of an erogenous zone of another, including without limitation to the thigh, genitals, buttock, pubic region, or, if the person is a female, a breast, for the purpose of sexually arousing or gratifying either person. ([Ohio Revised Code 2907.01](#))
- 2.6 Sexual Conduct** means vaginal intercourse between a male and female; anal intercourse, fellatio, and cunnilingus between persons regardless of sex; and, without privilege to do so, the insertion, however slight, of any part of the body or any instrument, apparatus, or other object in the vaginal or anal opening of another. Penetration, however slight, is sufficient to complete vaginal or anal intercourse. ([Ohio Revised Code 2907.01](#))
- 2.7 Emotional Abuse:** Emotional abuse occurs when a parent threatens a child with extreme or vague, but sinister punishment, a parent encourages a child to engage in delinquent behavior, or a parent repeatedly involves child in activities that cause significant distress to the child. Emotional abuse is synonymous with "mental injury" which means any behavioral, cognitive, emotional, or mental disorder in a child caused by an act or omission that is described in [ORC Section 2919.22](#). Suspicion of mental injury of a child may include multiple or a combination of stress-related behaviors as a result of parental harm or threat of harm, such as bedwetting, nightmares, cowering, etc.
- 2.8 Dependency** means a child is homeless or without adequate parental care, through no fault of the child's parents, guardian or custodian. This includes when a parent is incapacitated due to hospitalization, illness, or incarceration and there is no other available, appropriate caretaker. It also may include when a parent, caregiver, or custodian is overwhelmed with or incapable of providing for the extreme special needs of the child. ([Ohio Revised Code 2151.04](#))

- 2.9 Civil Authorities** means local child protection services and/or law enforcement. Child protection reports shall be made to the county where the parent/guardian resides. Reports to law enforcement shall be made to the police jurisdiction where the alleged child maltreatment occurred, even if this differs from the law enforcement jurisdiction of the child's residence. A report to either civil authority satisfies the law for mandated reporters.
- 2.10 School Personnel** means any person, whether paid or unpaid, performing official duties for the school during the school day or school-sponsored activities, including, but not limited to, athletics, academics, field trips, music, and the arts.
- 2.11 The Reporter** is defined as the person with knowledge of the alleged child maltreatment.
- 2.12 Building Administrator** is the principal or assistant principal assigned to the campus where the child is enrolled.

Section 3: Reporting Procedures

- 3.1 Who Must Report:** All school personnel, whether paid or volunteers, are considered Mandated Reporters under [Ohio Revised Code 2151.421](#). Any school personnel who knows or has reasonable cause to suspect that a child known to him or her in her professional capacity has been or is in immediate danger of child maltreatment (as defined above) by any parent, guardian, or other person who has permanent or temporary care or custody or responsibility for the supervision of a child (including school employees) or any household or family member of such child, shall make a report to Civil Authorities as directed below.

Such report must also be made if school personnel knows or has reasonable cause to suspect a child known to him or her in his or her professional capacity has been or is in immediate danger of being a victim of sexual abuse or attempted sexual abuse as prohibited in [Chapter 2907 of the Ohio Revised Code](#).

An employee must act on the basis of any reasonable information and belief.

3.2 Reporting to Civil Authorities

Any report required to be made under this policy, shall be made as follows:

1. The reporter shall immediately verbally notify their assigned building administrator via phone or face-to-face contact.
 - a. If the building administrator is not immediately available but will be available later in the same school day, the reporter can send an email to the administrator

- to immediately notify them and speak to them later in the day when they are available.
- b. If no building administrators will be available during the same school day, the school personnel with reason to suspect child maltreatment will make the report to the appropriate authorities without waiting to notify building administrators.
2. Following verbal notification (or in the absence of notification if building administrator is unavailable), a formal report will be made to the proper civil authorities. The law stipulates that this report be made immediately. For the purposes of this policy, it is stipulated that the report be made as soon as possible after the information is known, preferably within the same school day or within no more than 24 hours.
 - a. It is strongly recommended that this report be made with two school personnel present (i.e., reporter and administrator, counselor, or other school personnel with knowledge of the situation).
 - b. In the event that the report is being made by a school volunteer or substitute teacher, school personnel must be present while the report is being made.
 3. Immediately following the report to Civil Authorities, the reporter will complete The Confidential School Report of Suspected Child Abuse/Neglect form (Appendix A) and submit to the building principal.
 - a. This form will be signed by the reporting employee, assigned school counselor, and building principal.
 - b. The building principal will submit the completed form to the Assistant Head of School.
 - c. The Assistant Head of School will submit the completed form to the Head of School.

The Head of School will notify the school's attorney and the President of the Board of Directors.

3.3 Emergency Situations

In the event that the reporter or building administrator determines that the child is in imminent risk of harm if they should return home that day or the child has visible injuries alleged to have been caused by physical abuse, law enforcement may be immediately contacted by the school. In this situation, the school will follow law enforcement directions regarding next steps. A report to Child Protection Services shall still be made in the manner described in section 3.2 of this policy.

3.4 Contacting Parents

Worthington Christian seeks to partner with parents to the greatest extent possible. School personnel will notify a student's parent if the student is involved in a situation necessitating a mandatory report. However, the school may make a professional judgment if there are reasonable concerns that the student's well-being would be jeopardized by the parental notification. One specific scenario in which parents would

not be notified is if the parent is reasonably suspected to have engaged in child abuse or maltreatment.

Ohio law allows anonymity in reporting child abuse and neglect, and a child protection agency will never disclose who reported the child maltreatment to them. Professional judgement will be employed and the circumstances examined to determine whether parents will be contacted at the time of the report being made to civil authorities.

As an effort to provide care for the student and the family, administrators and other employees will be available to speak with families should they have questions or concerns regarding civil authority involvement. At all times, the identity of the reporter will be protected by administration and counselors. There are times the reporter may speak with parents directly and inform them they made the referral to civil authorities. This is permissible if it is deemed to be helpful to all parties.

In the event that school personnel learn of a concern of potential sexual abuse or maltreatment that does not warrant a referral to civil authorities by the school, parents will be informed of their right to contact law enforcement on their own, if they and their student desire.

Section 4: Reporting and Investigation Information

A report is required to be made if school personnel has reasonable suspicion that a child under their care, custody, or control may be the victim of any child maltreatment. Circumstances surrounding each individual situation are nuanced; therefore, it is not possible to capture every possible scenario. However, please reference Franklin County Children Services' publication linked [here](#) for signs of potential abuse to help you make a decision regarding the need to call civil authorities.

Child abuse reporting law can be confusing. There are some situations that may seem reportable but are not abuse by definition. It is wise to discuss situations like these with administration or counselors to determine if a report should be made. If you are in doubt or unable to consult with someone, you should default to making a report.

4.1 Surrounding County Child Protection Services Contact Information

School personnel should utilize the contact information below in accordance with Ohio law and Worthington Christian policy:

- Franklin County Children Services – (614) 229-7000 (24-hour hotline)
- Delaware County Children Services – (740) 833-2340 (24-hour hotline)
- Union County Children Services – (937) 644-1010 (Monday-Friday from 8:00 a.m.- 4:30 p.m.)
- Union County Sheriff's Office – (937) 645-4110 (outside of above hours)
- Licking County Child Protective Services – (740) 670-8888 (Monday-Friday from 8:00 a.m.-5:00 p.m.)

- Licking County Sherriff's Office – (740) 670-5500 (outside of above hours – ask for on-call social worker)

4.2 Cooperating with Local Authorities

If local authorities are investigating a child abuse or maltreatment case involving students or employees, Worthington Christian will cooperate with the local authorities. This would involve, but not be limited to, providing information, sharing evidence, and timing the school's investigation.

Section 5: Other Policies

School personnel should keep in mind that this policy deals only with child abuse and maltreatment. School personnel should be mindful of other policies (e.g., sexual harassment, FERPA, student and employee discipline procedures) when responding to concerns of this nature.

Section 6: School Responsibilities

Worthington Christian will undertake the following matters:

6.1 Application for Employment or Volunteers

All applicants for a employment at Worthington Christian shall include references and grant permission to conduct BCI 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.

Worthington Christian will receive applications from all potential employees and review those applications, conduct interviews, check references, and review the results of BCI and FBI background checks. Volunteers who will be working in positions identified as having direct independent contact with students shall undergo a volunteer background check as well.

All employees shall re-submit to BCI and FBI background checks every five years. Licensed faculty shall complete this as part of their license renewal. All other employees, including 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.

6.2 Retaining Records

Worthington Christian will retain appropriate records arising from this policy 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, Worthington Christian is to document and retain complete records of any claim related to alleged maltreatment of a minor.

6.3 Training

All employees shall receive training on the identification and prevention of child maltreatment and their mandatory reporting requirements. Employees and volunteers shall each receive copies of and training on the Worthington Christian Employee-Student Relationship Guidelines found in Appendix B.

6.4 Self-Reporting

In the event a current employee of Worthington Christian 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 ongoing event within 72 hours.

6.5 Requests for Information

As with all media inquiries, any requests related to child maltreatment should be referred to the Head of School. If members of the school community have questions, they should be referred to the Head of School as well.

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 school administration to the extent necessary, 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 Worthington Christian 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 school's administration may disclose that an allegation of child maltreatment has been made and any actions which have been taken as a result thereof. Any disclosures of this nature will be made only after consultation with the school's attorney.

If the case becomes known to the media, Worthington Christian will respond to inquiries by reinforcing its policies, stating our institutional concern to protect its students and confirming our cooperation with investigating authorities. Only information approved by the school's attorney that is consistent with the school's policies will be shared.

Section 7: Child Maltreatment Organizational Matters

- 7.1** All school employees are required to abide by the Employee-Student Relationship Guidelines set forth in Appendix B. These guidelines will be provided to each administrator, teacher, employee, and volunteer (who has interactions with minors) at Worthington Christian. These guidelines may be reviewed and revised periodically by Worthington Christian.
- 7.2** The Restrictions on Identified Sex Offenders set forth in Section 8 of this policy will be administered by the Head of School. These Restrictions may be reviewed and revised periodically by Worthington Christian.
- 7.3** A competent and qualified person will be designated by the Head of School to coordinate assistance for the immediate care of persons who claim to have been abused by school personnel when he/she was a minor. It will be the responsibility of this person to assist with the provision of counseling, spiritual assistance, and other social services to the person alleging abuse.
- 7.4** The policy will be provided to each Worthington Christian employee and will be made available to the community on the school's web site.

Section 8: Restrictions on Identified Sex Offenders

This section of 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 section of this policy is primarily to provide appropriate protection for students enrolled at Worthington Christian. 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 Worthington Christian.

- 8.1** Worthington Christian will not employ nor continue to employ any person who has admitted to or been convicted of criminal sexual misconduct.
- 8.2** 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.
- 8.3** 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.

- 8.4** 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 7.2.
- 8.5** Each offender will be asked to meet with the Head of School, a building principal, or one of their designees to review the restrictions. They will sign an agreement that:
- outlines the restrictions,
 - includes an acknowledgement that they have been made aware of these restrictions,
 - specifies that school administrators may notify any and all persons that they deem necessary to be informed of the person's background, and
 - affirms the individual's willingness to abide by these restrictions
- 8.6** Based on the nature of the legal restrictions and terms of probation or parole for the individual, the school's administration may add additional restrictions as deemed necessary. These restrictions cannot reduce any court-imposed requirements.
- 8.7** In some cases, the school's administration may require the individual to have regular contact with an assigned mentor.
- 8.8** Failure to abide by the agreed upon restrictions may result in the school restricting the individual from all school-sponsored activities.
- 8.9** The duration of these restrictions or any modifications upon these restrictions will be made by the school administration with a report made to the Head of School.
- 8.10** Specific questions on this policy and its interpretation are to be directed to the Head of School.

The Child Maltreatment and Mandated Reporting Policy was adopted by the Worthington Christian Board of Directors on May 17, 2023. This policy along with the Title IX Sexual Harassment and Non-Discrimination Policy supersedes the Child Protection Policy.

Appendix A

Confidential School Report of Suspected Child Abuse/Neglect

Confidential School Report of Suspected Child Abuse/Neglect

- Employees are required by law and Worthington Christian School policy to report suspected child abuse/neglect.
- The employee reporting suspected child abuse/neglect must complete this form.
- The principal should forward a completed form to the Assistant Head of School.

Date & time reported to Child Protective Services: _____ Campus (circle): LS/US

Child protective services intake screener name: _____

Intake ID Number: _____

Police Notification: ☐ Yes ☐ No Date & time reported to police: _____

Law Enforcement Agency Contacted: _____ Name of office: _____

Police Response: _____

Child's name: _____ Grade: _____ Date of birth: _____ Sex: _____

Child's address: _____

Other children in home: _____

Parent/Guardian name: _____ Phone: _____

Circumstances leading up to the suspicion that the child is the victim of abuse/neglect including the nature of injuries; if any: _____

Other pertinent information: _____

Alleged Perpetrator (if known): _____

Reporting Employee Signature

Date

School Counselor Signature

Date

Building Principal

Date

Appendix B

Employee-Student Relationship Guidelines

Employee-Student Relationship Guidelines

The [Licensure Code of Professional Conduct for Ohio Educators](#) 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, Worthington Christian would like to further define what a healthy and biblical employee-student relationship looks like and what the employee'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. Employees 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 employee contact with students 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 an employee 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 employee to male student or female employee 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 employees and students but not officially sponsored by the school including a 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 An employee-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 Employee 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 employee when using phone calls, emails, social media, and other electronic communication as a form of communication with students. When possible, the employee 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 (e.g., 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 an employee (e.g., home from school or practice) requires the prior permission of the student's parent. Caution should be exercised by the employee, 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 employees follow the same guidelines for non-school-related contact as listed in section 3.

5. Coaching

- 5.1 Any contact between a coach and a student-athlete 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 care school nurses and counselors provide and the required privacy in accordance with their professional licensure may require that persons serving in these positions be exempted at times from these guidelines. The exemptions may take place when, in the professional judgment of the nurse or counselor, it is necessary to provide appropriate and professional care to the student.

The Employee-Student Relationship Guidelines were adopted on February 6, 2008, were revised on June 19, 2023, and updated on August 12, 2025.