



IT'S NOT JUST WHAT YOU LEARN.
IT'S WHO YOU BECOME.

SAR ACADEMY & HIGH SCHOOL

STUDENT SAFETY MANUAL



INTRODUCTION

Beginning in the 2019-2020 school year, Salanter Akiba Riverdale Academy/Salanter Akiba Riverdale High School ("SAR" or the "School") began an evaluation of School practices and policies to ensure that we are creating the safest possible environment for our students.

In order to best do this work, we engaged Praesidium Inc. Working with researchers at the University of Texas, Praesidium has emerged as a leader in risk assessment for organizations that work with children, with a particular focus on preventing child sexual abuse. They help identify who is at risk, what types of programs are the most dangerous, and where and under what circumstances incidents and false allegations are most likely to occur.

Praesidium completed a three-day on-site risk assessment at SAR in January 2020. Praesidium's visit consisted of observing school programming, during which Praesidium interviewed over 80 individuals, including various members of administration, faculty, and staff. In addition, Praesidium reviewed system-wide and program-specific policies and procedures, personnel files, critical incident data, and training curricula. Praesidium also conducted architectural inspections of the school property.

Following the on-site visit, Praesidium worked with SAR to provide feedback outlining areas of strength and areas of improvement for SAR. Our partnership with Praesidium has given SAR access to best practices, written resources to strengthen prevention efforts, and ongoing consultation with their experts. Utilizing Praesidium's feedback, we worked with experienced legal counsel with expertise in education and child safety to develop and adopt policies and procedures based on Praesidium's recommendations.

These policies and procedures, which will be implemented and formalized over the coming months, along with existing policies and procedures, form the enclosed SAR Student Safety Manual. It is important to note that this is a living document; over time, and as we learn more, we may update these policies and procedures. This work is ongoing.

Effective March 2021, SAR has been accredited by Praesidium, demonstrating our organization's commitment to safety and adherence to the highest standards in abuse prevention. Additionally, SAR has also joined the Aleinu Campaign, an organization funded by UJA-Federation of New York, which provides Jewish youth-serving organizations with the education and practical tools they need to prevent child maltreatment and take responsible action should instances or suspicions of maltreatment emerge. Our work with Aleinu is ongoing, and we intend to continue working with other Jewish organizations that specialize in this area to make sure that we are always employing best practices.



INTRODUCTION (CONT'D)

It is imperative that we remember we are all partners in ensuring a safe community. All parents, faculty and staff have a responsibility to review the enclosed Student Safety Manual carefully. If you have any questions or concerns about any of its policies, please contact StudentSafety@saracademy.org.

At all times, our priority is the safety of the students you have entrusted to us. We continuously appreciate your partnership and support in creating a joyful, warm, and safe educational environment for our students to thrive in and grow.

Rabbi Binyamin Krauss
Principal, SAR Academy

Rabbi Tully Harcsztark
Principal, SAR High School
Dean, Machon Siach

Rabbi Jonathan Kroll
Principal, SAR High School

Jack C. Bendheim
President, SAR Board of Trustees



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ZERO TOLERANCE FOR ABUSE

ZERO TOLERANCE FOR ABUSE

SAR is committed to providing a safe environment for students, faculty, and staff, and to preventing abusive conduct in any form. Every member of the organization is responsible for protecting the individuals we serve and ensuring their safety and well-being.

Abuse of any kind is not permitted at SAR. We do not tolerate physical, sexual, emotional or verbal abuse or misconduct in our community, and expect all community members to report any suspected instances of abuse.

This commitment extends beyond the environment of SAR itself. SAR will not, under any circumstances, recommend or serve as a reference for any former employee that it suspects or has reason to suspect is a danger to the safety of children.



POLICIES
GOVERNING
INTERACTIONS
BETWEEN
ADULTS AND
YOUTH

APPROPRIATE AND INAPPROPRIATE PHYSICAL INTERACTIONS BETWEEN ADULTS AND STUDENTS

SAR's physical contact policy promotes a positive, nurturing environment while protecting minors and adults. The School encourages appropriate physical contact with minors, as well as appropriate verbal interactions such as verbal praise. The School prohibits inappropriate displays of physical contact. Any inappropriate physical contact by adults toward minors in the school's programs will result in disciplinary action, up to and including termination of employment and reporting to appropriate authorities as needed.

The School's policies for appropriate and inappropriate physical interactions are:

APPROPRIATE PHYSICAL INTERACTIONS	INAPPROPRIATE PHYSICAL INTERACTIONS
<p>In All Grades:</p> <ul style="list-style-type: none"> ▪ Pats on the shoulder or back ▪ Handshakes ▪ High-fives and hand slapping ▪ Pats on the head, when culturally appropriate ▪ Touching hands, shoulders, and arms ▪ Arms around shoulders <p>In the ELC Only:</p> <ul style="list-style-type: none"> ▪ Holding a child in your lap for a short period of time to calm and comfort them <p>In the ELC & Lower School Only:</p> <ul style="list-style-type: none"> ▪ Holding hands while escorting students 	<p>In All Grades:</p> <ul style="list-style-type: none"> ▪ Hugging a student in an isolated area ▪ Hugging a student of the opposite gender after third grade ▪ Kisses ▪ Showing affection in an isolated area ▪ Lap sitting, outside of the permitted interactions in an ELC classroom ▪ Wrestling ▪ Piggyback rides ▪ Tickling ▪ Any type of massage given by or to a minor ▪ Any form of affection that is unwanted by the minor or the adult ▪ Compliment or comment relating to physique or body development ▪ Touching bottom, chest, or genital areas, with the exception of necessary toileting interactions in the ELC

In accordance with Jewish law and custom, the School does not permit faculty members to hug or embrace students of the opposite gender after third grade.



APPROPRIATE AND INAPPROPRIATE VERBAL INTERACTIONS BETWEEN ADULTS AND STUDENTS

School employees and volunteers are prohibited from speaking to minors in a way that is, or could be construed by any observer, as harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning, or humiliating.

Employees and volunteers must not initiate sexually oriented conversations with minors. In Middle School and High School, students are required to take coursework in Judaic Studies. This coursework includes classes in Health and Jewish Sexual Ethics. In the context of Jewish Sexual Ethics, discussions of pedagogy and ethical issues relating to Judaic law are encouraged. Discussions of an individual's sexual practices, whether student or staff member, are strictly prohibited.

Employees and volunteers are not permitted to discuss with minors their own sexual activities. SAR's policies for appropriate and inappropriate verbal interactions are:

APPROPRIATE VERBAL INTERACTIONS	INAPPROPRIATE VERBAL INTERACTIONS
<p>In All Grades:</p> <ul style="list-style-type: none"> ▪ Positive reinforcement ▪ Appropriate jokes ▪ Encouragement ▪ Praise 	<p>In All Grades:</p> <ul style="list-style-type: none"> ▪ Name-calling ▪ Discussing sexual encounters with students ▪ Discussing or in any way involving students in the personal problems or issues of employees and volunteers ▪ Secrets ▪ Cursing ▪ Inappropriate jokes, including those that are derogatory about gender, sexual orientation, race, cultural or religious beliefs ▪ Sexual jokes ▪ Shaming ▪ Belittling ▪ Derogatory remarks ▪ Harsh language that may frighten, threaten or humiliate minors ▪ Derogatory remarks about the minor or his/her family ▪ Bullying, hazing, sexual harassment and any other behavior that violates the SAR Anti-Harassment Policy



ONE-ON-ONE INTERACTIONS

In order to best protect the safety of our students and staff, SAR requires approval for one-on-one interactions outside of the School.

Staff members are not permitted to entertain students in their home, for any reason, without prior approval of the Principal.

In those situations where one-on-one interactions occur, adults should observe the following additional guidelines to manage the risk of abuse or false allegations of abuse:

- When meeting one-on-one with a minor, always do so in a public place where you are in full view of others.
- Avoid physical affection that can be misinterpreted. Limit affection to pats on the shoulder, high-fives, and handshakes.
- If meeting in a room or office, leave the door open or move to an area that can be easily observed by others passing by.
- If anything unusual occurs, such as a disclosure of abuse or maltreatment, immediately contact School Leadership (Principals, or in the case that families have a concern directly related to the Principal(s), they are directed to file a formal complaint with the Board of Trustees.)
- If any disciplinary issues, injuries, or any interactions that might be misinterpreted occur, immediately contact the Principals and document the interaction (see page 34).



INTERACTIONS BETWEEN STAFF AND STUDENTS OUTSIDE OF REGULARLY SCHEDULED PROGRAM ACTIVITIES

The School prohibits interactions between staff and students outside of regularly scheduled program activities unless approved by School Administration.

Approval of any activities outside of a regularly scheduled program will be granted if the School Administration feels the activity is appropriate outside contact. All outside contact with students is subject to parental permission.

Examples of appropriate outside contact include:

- Taking groups of four or more students on an outing.
- Attending sporting activities with groups of students.
- Attending functions at a student's home, with parents present.

Additionally, the School recognizes that the SAR community is small and interwoven. Many staff members have children who are students at the School. The School distinguishes between situations in which a staff member is acting as a parent or family member and interacting with their child's friend or a member of their family, and situations in which a staff member is acting as an employee of the School interacting with a student. When a staff member is acting as a member of the community, and not as a staff member, the burden is on the staff member to make sure that any interactions between themselves and a current student are approved by that student's parents. Regardless of how the staff member views the relationship, the School retains the right to inquire about the relationship and staff members must provide SAR with any requested information.



INTERACTIONS BETWEEN STAFF AND STUDENTS OUTSIDE OF REGULARLY SCHEDULED PROGRAM ACTIVITIES

(CONT'D)

In line with this policy, the School asks parents to identify all adults who may pick up their child from dismissal or drive their child home. As outlined below, parents must inform the School if a staff member is permitted to pick up their child from dismissal and/or drive them home. If parents do not inform the School that a staff member is permitted to pick up their child from dismissal and/or drive them home, that staff member is prohibited from picking up a child from dismissal or driving them home without first obtaining consent from the student's parent and providing notice to the Administration.

The School prohibits staff members from engaging in inappropriate outside contact, regardless of whether an employee is acting as a parent or an employee. Inappropriate outside contact includes:

- Taking students on an outing without their parent's written permission.
- Visiting students in their home, without a parent present.
- Entertaining groups of students which do not include a family member of the employee or volunteer, without permission from School Administration.
 - Even with permission from the Administration, staff members are only permitted to entertain groups of four or more students.



SHABBATONIM AND SCHOOL OVERNIGHT TRIPS

Any members of the SAR community participating in a Shabbaton or school overnight trip, including host families, faculty members, and students, must read and agree to abide by the policies and procedures listed in Appendix B.

SHABBATON GUIDANCE FOR FACULTY

If faculty would like to invite students to their home for a Shabbaton, they must review and agree to abide by the following guidelines:

- Faculty must receive approval from School Administration at least two weeks prior to hosting a Shabbaton (by end of day Friday, two weeks before) that they intend to host a Shabbaton and how many students they intend to host.
 - At least four students must be present at a Shabbaton. Groups of fewer than four students are prohibited.
 - Faculty must provide a list of the students that will be attending a Shabbaton by the end of the Thursday prior to a Shabbaton or the day before an overnight trip. The School will contact the parents to ensure that parental permission has been granted for students to attend.
- If students will be staying at homes of community members other than the faculty member, the faculty member must provide the School with the names, addresses, and phone numbers of the host families.
 - At least three students must stay in each host family's home. Groups of fewer than three students are prohibited.
 - Host families must be provided with a copy of the Host Family Shabbaton Guidance (see Appendix B).
- If neighbors, friends, or adults outside of the teacher's immediate family will be joining for Shabbat, the faculty member should provide the School with advance notice of those guests.
- Faculty members must create a safe environment for students, including taking reasonable steps to ensure that students do not have access to alcohol, drugs, or tobacco, including vaping products, or any other illegal substances.
- In addition to the foregoing, faculty members must abide by the Host Family Shabbaton Guidance, following.



HOST FAMILY SHABBATON GUIDANCE

Host families are members of the community who allow students to stay in their home for a Shabbaton. All host families must review and agree to abide by the following guidelines:

- At least three students must be staying at each host family's home. Groups of less than three students are prohibited.
- If a host family is unknown to the School Administration, they must be recommended in writing by a member of the community.
- Host families must review and sign the Host Family Shabbaton Guidance document and familiarize themselves with the expectations for students.
- Host families are encouraged to report to the School if students are in any way disrespectful.
- Students must have separate sleeping quarters from any adults in the home. Host families should not enter the bedroom that students are sleeping in except to wake them or monitor behavior, which should be done from the doorway.
- Students must have privacy. There may be no more than one student in the bathroom at one time when privacy is required; however, more than one student may be in the bathroom for use of the mirror and general hygiene (i.e., brush teeth or hair, apply makeup, etc.).
- Students may not enter the bedroom of the host family under any circumstances.
- Generally, students of the opposite sex must not stay in the same home. Occasionally, exceptions may be made if authorized in writing by a School Administrator. If an exception is approved, students of the opposite sex must have separate sleeping quarters.
 - Students of the same sex may share a double bed, but only two students may sleep in the bed, and only if comfortable.
- Generally, students will share a room with at least one other student. Occasionally, exceptions may be made if authorized in writing by a School Administrator.
- Host families must ensure that students do not have access to alcohol, drugs, or tobacco, including vaping products, or any other illegal substances.
- Students will be asked about their experience following a Shabbaton, including their interactions with the host family.
- If a host family wishes to stay in contact with a student following a Shabbaton, they must seek permission from the School and the student's parents before contacting the student.



CLASS SHABBATON / TRIP HOTEL OVERNIGHT GUIDANCE

Occasionally, students will travel on overnight trips or, in the High School, spend an overnight in the building. Faculty and staff must review and agree to abide by the following guidelines:

- At least three students must be staying in a room/area. Groups of less than three students are prohibited. Occasionally, exceptions may be made if authorized by a School Administrator.
- Students must have separate sleeping quarters from any adults. Faculty and staff will have their own hotel rooms or nearby sleeping quarters to monitor behavior. Students will be informed of those locations in case of emergency. A list is maintained of faculty and staff sleeping locations.
- Faculty and staff should wake students (by voice or knocking on a door) or monitor behavior from the doorway/entryway. Faculty and staff may enter the room, using appropriate discretion, as warranted. Faculty and staff are not to shake or touch students to wake them (or at any time).
- Faculty or staff may speak with a group of three or more students in a room with the door open.
- Students must have privacy. There may be no more than one student in the bathroom at one time when privacy is required; however, more than one student may be in the bathroom for use of the mirror and general hygiene (i.e., brush teeth or hair, apply makeup, etc.).
- Students of the opposite sex do not sleep in the same area of the hotel or school building. Occasionally, exceptions may be made if authorized by a School Administrator.
 - Students of the same sex may share a double bed, but only two students may sleep in the bed, and only if comfortable.
- Generally, students will share a room with at least two other students. Occasionally, exceptions may be made if authorized by a School Administrator.
- For Shabbatonim hosted at SAR, students are only permitted to sleep in the open classroom areas and in the open grade floor area (excluding the smaller nooks and locker areas). Classrooms with doors are locked and are not made available for sleeping.
- Students are given a time when they must return to their floor (sleeping area) for curfew and then a later quiet time. At least two faculty members remain on the floor until it is quiet and most students have fallen asleep.
- Faculty and staff must ensure that students do not have access to alcohol, drugs, or tobacco, including vaping products, or any other illegal substances.
- Students will be asked about their experience following a Shabbaton or overnight trip.



SUPERVISION AND TRANSPORTATION

SUPERVISING BATHROOM ACTIVITIES

Faculty and staff must only use adult restrooms. All staff and adults are prohibited from using student bathrooms. *(Note: this rule may be modified during the COVID-19 pandemic.)* Students must notify a faculty or staff member before leaving class to use the bathroom.

LOCKER ROOM SUPERVISION

When students are using the locker rooms in the High School, staff should stand outside but within earshot of the locker room. Staff should intermittently and briefly check inside the locker room so that students are aware that the locker room is monitored. To the extent possible, students of the same age should be using the locker room at the same time.

Locker room horseplay is prohibited. Staff should report any instances of suspicious or strange behavior in the locker room.



MONITORING TRANSPORTATION

Staff must notify the School Administrators before transporting students on field trips and extracurricular activities.

Staff may not transport students by car without permission from the Administration and the student's parent/guardian.

If transporting students via bus or van, there must be a staff member supervising the students. On overnight trips, there must be one staff member supervising every 12 students and the staff member driving the vehicle cannot be assigned as a supervisor.

- Staff should be randomly seated throughout the bus or van for easier supervision of students, with at least one staff member in the front of the bus and one in the far rear. Staff should sit in the aisle or in an outside seat so they can supervise students on the bus or van.
- On bus or van trips, male staff should not sit with female students and female staff should not sit with male students.
- On overnight trips, staff and students are prohibited from sitting together on the bus or van.
- On overnight bus or van trips, male students should not sit with female students and female students should not sit with male students.
- Staff must take a head count or roll call before loading and after unloading vehicles.

If transporting students via subway or public bus, there must be one staff member supervising every 12 students.

- Students should remain in one area of the train or bus, if possible.
- Staff that are assigned to a group should remain with that group on the train or bus.
- Staff must take a head count or roll call immediately after entering and leaving the subway/bus.



PICK-UP LIST POLICY

The School asks parents to identify all adults who may pick up their child from dismissal or drive their child home.

In the ELC and Lower School, students will only be dismissed to adults whom parents have listed on the pick-up list. Parents may make changes to the pick-up list at any time by contacting Seth Botnick at 718-548-1717 x1233 or sbotnick@saracademy.org. If a parent calls to make a change to the pick-up list, SAR Academy will confirm the change via email.

In the Middle School and High School, students self-dismiss. Parents are expected to speak with their children about who is on the pick-up list and make sure that students are aware of which adults they are permitted to travel home with. The School maintains this information in an abundance of caution, although it does not monitor it on a daily basis.



HIRING AND PERSONNEL POLICIES

INTERVIEW PROCESS

SAR will implement a consistent, multi-round interview process. This interview process will include, at a minimum:

- 1. Application**
- 2. Screening Call**
- 3. In-person Interview**
- 4. Reference Check**

Any individual entering the interview process will have to complete an application that includes questions to screen for abuse. The interview will be conducted by at least two SAR employees using a list of interview questions, including behaviorally based interview and reference questions that assess abuse risk, as well as standardized questions that all applicants for employment at SAR must answer.

Each applicant must submit three reference checks, including at least one personal, non-professional reference. Reference checks will also include behavioral questions that assess for abuse risk, and references will be asked directly to provide information about the candidate's experience working with children, and any concerns the reference might have about the candidate continuing to work with children.

SAR may get in contact for references beyond those named by the applicant.

All individuals must complete each step of the interview process, regardless of any prior association with SAR.



FINGERPRINTING AND BACKGROUND CHECKS

Every employee will be subject to a background check and fingerprint clearance through the New York State Department of Education, to the extent permitted by law. It is the responsibility of the employee to secure and pay for fingerprinting before beginning work with the School. The School will reimburse the employee for the cost of fingerprinting. In addition, the School asks that every staff member disclose previous criminal convictions and any pending criminal charges. Failure to do so may result in disciplinary action, up to and including termination.

EXTERNS, INTERNS, VOLUNTEERS, AND CONTRACTUAL WORKERS

Administration must inform the Business Office of any externs, interns, volunteers, and contractual workers. Any adults who are frequently in the SAR building, such as externs, interns, volunteers, or contractual workers, must acknowledge and abide by School policies, including the fingerprinting policy.

Before an extern, intern, volunteer, or contractual worker begins at SAR, the following steps must be taken by the Business Office:

1. A background check and/or fingerprint clearance for the extern, intern, volunteer, or contractual worker will be conducted.
2. The extern, intern, volunteer, or contractual worker will review all School policies.
3. Each extern, intern, volunteer, or contractual worker will sign the Certification & Acknowledgment of School Policies.
4. A meeting between the extern/intern and the Department Head, and/or meeting between the volunteer/contractor and the Principal will take place before the extern, intern, volunteer, or contractual worker begins working.



STAFF IDENTIFICATION

All staff and volunteers will be given an SAR identification badge. All staff must wear their SAR identification badge at all times while on the School premises.

If staff members see an adult in the building who is not wearing an identification badge, and they do not recognize that adult as a parent or guardian, staff members should approach the adult, introduce themselves, and ask who they are and for their connection to SAR. (*i.e.*, “Hi, I’m Mr. Smith, I don’t believe we’ve met before. What’s your connection to the School?”) If the adult is unable to provide a reason for being in the School, the staff member should escort him or her to the atrium or lobby and notify security.

ANNUAL TRAINING

SAR staff will be trained yearly on policies and procedures, including abuse prevention and reporting training. These trainings will provide an overview of mandated reporter training, the SAR Harassment Policy, and the policies and procedures contained herein. All new hires must complete the same training within 30 days of their start date.

School Leadership will complete annual reviews of employee guidance and training.

EVALUATION PROCESS

All SAR staff members will be evaluated by the Principals on a yearly basis with regards to their compliance with these policies and procedures. All annual reviews will be submitted to the board.



TUTORING

Staff members are permitted to tutor current SAR students as long as the student they are tutoring is not currently in their class. Teachers must receive approval from School Administration before beginning any tutoring outside of regular academic activities.

Any in-school tutoring or one-on-one support provided to students must be done in a public place (i.e., the cafeteria, Beit Midrash, or library) and/or in the presence of other individuals.

From time to time, during remote teaching, teachers may need to videochat with individual students. Additionally, teachers may tutor students virtually.

Whenever a staff member video chats or virtually tutors an individual student, they must take the following steps to make sure the student's parents are aware that they are meeting individually with that student: (1) add the student's parents' email addresses to the event invitation and (2) label the event 1:1 meeting. Staff are not allowed to video chat with individual students without following these guidelines.



MANDATED REPORTERS

Under Section 413 of the New York State Social Services Law, all school officials, including, but not limited to, administrators, faculty, guidance counselors, and health care professionals employed by SAR are "Mandated Reporters" and have an affirmative duty to report when they have "reasonable cause to suspect" that a child has been abused or maltreated by a parent or legal guardian or someone else legally responsible for their care and such information has come to the school official's attention in the course of his or her official or professional capacity.

- A "Mandated Reporter" must call the New York State Central Registry ("SCR") at 1-800-635-1522 upon having such "reasonable cause." This is the personal duty of the person who has such reasonable cause and is not satisfied by telling a supervisor at the School. Consulting with a supervisor at the School before making such a call, however, is allowable, and indeed advisable, but the consent or approval of such supervisor is never a requirement for making a call to the SCR.
- This reporting duty applies to knowledge obtained during the course of any out-of-school activity, as well as when on school premises, and indeed to any knowledge of abuse or maltreatment of a child "coming before them in their official or professional capacity" at any time or place.
- The SAR Administration is always available to discuss such situations, offer advice and support, and be present should a call to the SCR need to be made. Oral reports to the SCR must be followed up within 48 hours with a written report using form LDS-2221-A which can be obtained from the New York State Office of Children's Services (OCFS) website at www.ocfs.state.ny.us.
- Failure to report a suspected case of child abuse or maltreatment perpetrated upon a child by a parent, legal guardian, or someone else legally responsible for the child's care, as defined in the New York State Family Court Act, is a class A misdemeanor punishable by up to one year in jail and/or a fine of \$1000. In addition, it is a violation of SAR policy and is therefore an offense for which an employee may be terminated.
- Under New York State Social Services Law, any school employee who in good faith makes a report to the State has immunity from liability, civil or criminal, which might otherwise result by reason of such action.
- The Mandatory Reporting to the State is in addition to and not a replacement for the required reporting to the SAR Administration of any possible violation of this policy.



ELECTRONIC COMMUNICATIONS AND COMPUTER USE POLICY

SAR's computers, voicemail, email and other electronic devices (i.e., iPads, tablets, copiers, scanners, phones, facsimiles, etc.) are for School business only. They are not to be used for inappropriate or harassing purposes or in any manner that violates applicable law.

SAR may access its electronic communications systems and obtain the communications within the systems, with or without notice to users of the system, in the ordinary course of business when the School deems it appropriate to do so. SAR employees should have no expectation of privacy in the property of the School, which includes, but is not limited to, its technology systems such as email, voicemail, internet, and telephone systems.

The reasons for which the School may obtain such access include but are not limited to: maintaining the system; preventing or investigating allegations of system abuse or misuse; assuring compliance with software copyright laws; complying with legal and regulatory requests for information; investigating possible SAR policy violations; and ensuring that School operations continue appropriately during an employee's absence.

From time to time, for educational purposes only, a staff member may post information relating to coursework on a School website. SAR, within its sole discretion, may remove content posted by a staff member on any school hosted or maintained forum at any time. All system passwords must be available to SAR Administration.

SAR's policies prohibiting discrimination, sexual harassment or harassment, in their entirety, apply to the use of the School's communication and computer systems. No one may use any communication or computer system in a manner that may be construed by others as harassment or offensive based on age, race, creed, color, national origin, gender, gender identity, disability, marital status, partnership status, sexual orientation, alienage, citizenship status, or any other characteristic protected by applicable federal, state or local law, regulation or ordinance.

No one may use the School's communication or computer systems to access, display, possess, or distribute inappropriate information, including materials that:

- Are pornographic, obscene, or sexually explicit
- Violate SAR policies prohibiting discrimination, sexual harassment, or harassment, as outlined in the SAR Anti-Harassment Policy
- Engage in any illegal act or violate any local, state, or federal statute or law



ELECTRONIC COMMUNICATIONS AND COMPUTER USE POLICY (CONT'D)

Any use of the School's electronic communications and computer systems by a staff member constitutes consent to the inspection, search, or monitoring of such staff member's use of the system by the School. A failure to acknowledge affirmatively such consent or a failure to cooperate in an inspection, search, or monitoring activity may result in disciplinary action for the staff member up to and including immediate termination of employment.

Since our electronic communications systems are for School business use only, these systems may not be used to solicit for political causes, outside organizations, or other personal matters unrelated to School business. All email messages are part of SAR's records and, as such, may be disclosed without the staff member's permission. Therefore, staff members should have no expectation of privacy whatsoever with respect to their use of the School's electronic communications and information systems, including in any message, file, data, document, facsimile, or any other form of information transmitted to, received from, or stored on any electronic communication or information system owned, leased, used, maintained, moderated, or otherwise operated by SAR.

In using internal or external email, as with any other form of electronic communication, staff members must maintain confidentiality of all School business information, student, and family information and all information that is proprietary to the School. Staff members should further be aware that no right of exclusive confidentiality exists on the Internet. Its use may waive any confidentiality of proprietary products and information. Accordingly, consideration should be given as to sensitivity of information before transmission on external electronic communications. When in doubt, use an alternate method of transmission.

Violators of this Electronic Communications and Computer System Use Policy may be subject to discipline up to and including termination.



INAPPROPRIATE INFORMATION POLICY

No one may access, display, possess, or distribute inappropriate information and materials on SAR property, including materials that:

- Are pornographic, obscene, or sexually explicit
- Violate SAR policies prohibiting discrimination, sexual harassment, or harassment, as outlined in the SAR Anti-Harassment Policy
- Engage in any illegal act or violate any local, state, or federal statute or law

GUIDELINES FOR STAFF-STUDENT COMMUNICATIONS AND SOCIAL MEDIA

In order to clearly mark the boundaries so that we can protect and enhance the relationships between teachers at SAR and their students, the following policy guidelines should guide our communication with students and our use of social media.

Email: Students should only contact SAR Academy or SAR High School faculty and staff at their professional email addresses. Faculty and staff may only email students at the students' SAR email addresses. Faculty and staff may only email students from their SAR email account. If a student emails a faculty or staff member from a personal email account, the faculty or staff member must respond to the student's SAR email.

Phone calls: If a teacher needs to contact a student outside of school hours, he/she will do so by calling the student's home phone number or the parent's contact number. Students may not be contacted on their cell phones. At the Administration's discretion, faculty may call students' cell phones on school trips and Shabbatonim.

Texting (which may include iMessage, WhatsApp, Google Chat, and other messaging platforms): Teachers and students may not text each other. Communication between a student and teacher should be only through school email. At the Administration's discretion, texting may be used by Administration and faculty to communicate with students on school trips and Shabbatonim; such texting must be done through Ruvna or a similar app, and an Administrator must be copied on all communications with students.



GUIDELINES FOR STAFF-STUDENT COMMUNICATIONS AND SOCIAL MEDIA

(CONT'D)

Social Media (which may include Facebook, Twitter, Snapchat, Instagram and other social media platforms): Teachers may not “friend” or follow students and/or accept friend or follow requests from students or private accounts. Teachers may not direct message students on Twitter, Facebook, Instagram, or other social media platforms. Teachers may follow students on a public Twitter account. While students may follow a teacher’s personal Twitter feed, if it is public, they should not be required to do so.

Videochat (which may include FaceTime, Skype, Zoom, Google, and other video chat platforms): Teachers may video chat with an entire class for purposes of remote learning.

From time to time, teachers may need to video chat with individual students in a separate session. Whenever a staff member video chats with an individual student, they must take the following steps to make sure the student’s parents are aware that they are meeting individually with that student: (1) add the student’s parents’ email addresses to the event invitation and (2) label the event 1:1 meeting. Staff members are not allowed to video chat with individual students without following these guidelines.



STANDARDS OF CONDUCT

The successful operation and reputation of the School is built upon principles of ethical conduct of our employees. SAR's reputation for integrity and excellence requires careful observance of all applicable laws and regulations, as well as scrupulous regard for the highest standards of conduct and personal integrity. The School will comply with all applicable laws and regulations and expects all employees to conduct their work in accordance with all relevant laws and to refrain from any illegal, dishonest, or unethical conduct.

While it is not possible to list all the forms of behavior that are considered unacceptable in the workplace, some of the unacceptable forms of behavior are discussed in more detail elsewhere in the SAR Staff Handbook, the Anti-Harassment Policy, and the Student Safety Manual. Other misconduct will be evaluated based on the specific facts and circumstances. However, nothing in this section is intended to change the "at-will" nature of the employee's status and SAR may terminate an employee for any reason that does not violate any applicable law, at any time, with or without taking the progressive disciplinary measures listed below.

Discipline may include any of the following actions, at the School's sole discretion:

- Counseling by the employee's supervisor or Principal(s)
- Written warning by the supervisor or Principal(s)
- Letter documenting the infraction included in personnel files
- Suspension without pay or probation
- Review of the behavior before a panel including the SAR Academy Principal, the SAR High School Principal, and a member of the Board of Trustees, and any other individuals deemed appropriate by the Administration
- Termination of Employment

Generally, the following steps will be taken by SAR to address a disciplinary matter, infraction or performance concern of an employee. In no event, however, are these steps required to be taken by the School and the School reserves the right to bypass these steps and employ any disciplinary action it deems necessary, up to and including, placement of a letter immediately in the employee personnel file documenting the infraction, performance concern or disciplinary matter, and termination of employment.



STANDARDS OF CONDUCT (CONT'D)

Step (1): Informal meeting held between supervisor and staff member to discuss a specific issue (or issues) of concern. Following the meeting, an email should be sent by the supervisor to the staff member detailing the informal meeting and outlining next steps agreed upon at the meeting, including a time frame for improvement. A follow-up conversation between staff and supervisor should occur, even if the performance improves.

Step (2): If the issue is not resolved, a formal meeting is held with the supervisor and staff member. Other members of the Administration may join this meeting to discuss the specific issue of concern that has not improved. Again, staff members are provided with written notice of the specific issue of concern that must improve, or the next step will be a letter for file. A follow-up conversation between staff and supervisor should occur, even if the performance improves.

Step (3): If the issue is not resolved a meeting will include:

- Principal(s)
- Supervisor
- Staff member
- Other members of the Administration

Staff members will receive a letter for file which they will have 24 hours to review. Staff members are expected to sign off and acknowledge the letter for file. The staff member will be given a time frame to improve their performance, or face the possibility of further disciplinary action, up to and including termination of employment.

Step (4): If the performance does not improve, the staff member's behavior and performance will be reviewed by a panel that includes (1) the SAR Academy Principal, (2) the SAR High School Principal, and (3) a member of the Board of Trustees, as well as any other individuals deemed appropriate by the Administration. Disciplinary action may be taken, up to and including, termination of employment and reporting to appropriate authorities as needed. The panel will determine the appropriate further disciplinary action, up to and including, termination of employment.

SUSPENSIONS PENDING INVESTIGATION

If an SAR employee or volunteer is accused of inappropriate behavior with a student, that employee or volunteer will be suspended immediately, pending investigation.



FORMAL COMPLAINT PROCESS AND INVESTIGATING COMPLAINTS

FORMAL COMPLAINT PROCESS

When families or staff members make contact with concerns, SAR makes every effort to resolve these concerns at the School level. SAR Academy and SAR High School are proud of their open-door policy that allows families direct access to the Principals, who are often best equipped to handle the majority of staff and family concerns.

Community members are asked to bring any complaint to the Principals and are encouraged to meet in person to share any concerns.

If families or staff members are not satisfied with the outcomes of these meetings, or if families or staff members have a concern directly related to the Principal(s), they are directed to file a formal complaint with the Board of Trustees.

- Families are asked to put their concerns in writing, addressed to Jack C. Bendheim, President of the Board of Trustees, and emailed to Jack.Bendheim@pahc.com.
- The Board will then review the complaint and speak with relevant parties.
- The President of the Board will draft a written response to the families on behalf of the Board.
- SAR will then implement any remedial actions recommended by the Board's response.

PROCEDURES FOR RESPONDING TO ALLEGATIONS AND/OR INCIDENTS OF ABUSE

EMPLOYEE OR VOLUNTEER RESPONSE TO ABUSE

As required by NYS law, employees and volunteers of SAR must report any suspected abuse or neglect of a student - whether on or off SAR property or whether perpetrated by staff, volunteers, or others - to state authorities. Reports may be made confidentially or anonymously. A person who mistakenly reports suspected abuse is immune from civil or criminal liability as long as the report was made in good faith and without malice. Complaints can be made to the Mandated Reporter Hotline at 1-800-342-3720.

In addition to reporting to state authorities, employees and volunteers are required to report any suspected or known abuse of students perpetrated by employees or volunteers directly to the Administration so that immediate and proper steps may be taken to ensure the safety of alleged victims and others who may be at risk. Reports of suspected or known abuse may be made confidentially to the Principal.



ADDITIONAL GUIDELINES FOR RESPONSE TO INCIDENTS OR ALLEGATIONS OF ABUSE

- If you witness abuse, interrupt the behavior immediately.
- If abuse is disclosed to you, assure the individual disclosing that he or she was correct to tell you.
- Protect the alleged victim from intimidation, retribution, or further abuse.
- Be sure to document the incident, disclosure, or circumstances causing your suspicion of abuse.
- It is not your job to investigate the incident, but it IS your job to report the incident to your supervisor and follow all mandated reporting procedures in a timely manner.

SUPERVISOR AND ADMINISTRATOR RESPONSE TO ABUSE

In addition to the above response procedures, supervisors and administrators should ensure the following:

- Determine the immediate needs of the victim.
 - Prioritize the privacy and safety of any student involved in any potential incidents of abuse, to the extent permitted by law and the bounds of any investigation.
 - Work with the family to ensure they receive the necessary support and guidance and will be kept informed every step of the review process.
 - Protect the alleged victim from further exposure from the accused pending completion of the investigation.
- Ensure that the incident has been reported to the proper state and/or child protection authorities.
- Coordinate with the appropriate administrator to:
 - Suspend the accused and remove from access to students
 - Notify parents
 - Review the file of the accused
 - Gather and document information surrounding the incident
 - The incident reports will be saved by School Administration in a centralized, secure location.
 - Communicate with the authorities as to the timing of the internal investigation
 - Initiate and evaluate termination/dismissal options if abuse is confirmed
 - Prepare a media response



PROCEDURES FOR RESPONDING TO ALLEGATIONS AND/OR INCIDENTS OF PEER-TO-PEER ABUSE

MINOR-TO-MINOR INTERACTIONS

Most serious incidents of minor-to-minor abuse are preceded by more subtle incidents such as name-calling, taunting, or roughhousing. Interrupting these interactions early and establishing and communicating standards of conduct can keep the program environment safe. SAR recognizes that the following interactions are high risk and are prohibited:

- Hazing
- Bullying
- Derogatory name-calling
- Games of "Truth or Dare"
- Singling out one minor for different treatment
- Ridicule or humiliation

In the event that an employee or volunteer sees a minor exhibit sexualized behaviors or suspects minor-to-minor sexual activity, the employee or volunteer is instructed to do the following:

- Interrupt the behavior and separate the minors. Do not investigate.
- Report the behavior to a Supervisor or Director and follow all mandated reporting obligations (if applicable) and document accordingly

In the event that a Principal or Administrator receives a report of a minor's sexualized behavior or minor-to-minor sexual activity, the Administrator should do the following:

- Follow all mandated reporting policies and procedures (if applicable)
- Determine the appropriate Administrator to conduct an internal review of the incident
- Notify the parents of all minors involved
- Notify the authorities if required by state reporting mandates
- Document the incident and the program's response
 - The incident reports will be saved by the Administration in a centralized, secure location.
- Develop a written corrective action or follow-up plan in response to the incident



PROCEDURES FOR RESPONDING TO ALLEGATIONS AND/OR INCIDENTS OF PEER TO PEER ABUSE (CONT'D)

After the internal review of the sexualized behavior or minor-to-minor sexual activity, SAR will determine what can be done to prevent a recurrence, such as:

- Review the need for additional supervision
- Review the need for revised policies or procedures
- Review the need for additional training
- Alert others in the organization (to the extent permitted)

COMMITMENT TO PRIVACY AND SAFETY

To the extent permitted by law and the bounds of any investigation, SAR will prioritize the privacy and safety of students involved in any potential incidents of abuse. Likewise, to the extent permitted by law and the bounds of any investigation, SAR will protect the identity of any individual employees who report suspected abuse.



PARENTS AS PARTNERS

FAQS FOR PARENTS

Who should talk to my child about safety?

A parent is the best person to teach a youth about personal safety. However, the staff at the School will also be communicating similar messages. It is important for adults to be delivering a similar message.

When should I speak with my child about safety?

While age and maturity matter and will impact the information you provide, as well as the manner in which it is provided, much of the content will be repeated for years to come. Start teaching very young children the correct names for their body parts.

What else can I do to help keep my child safe?

- Listen to your child.
- Know your child's daily activities and habits.
- Listen to what they like and what they don't like.
- Encourage open communication. Let your child know they can talk to you about any situation.
- Reassure your child that their safety is your number one concern.

Teach your child.

- Set boundaries about places they may go, people they may see, and things they may do.
- Reinforce the importance of the buddy system.
- Tell your child to trust their instincts - it's OK to say no.

Get involved.

- Know where your child is at all times.
- Your child should check in with you if there is a change in plans.
- There is no substitute for your attention and supervision.

Practice Safety Skills.

- Rehearse safety skills so that they become second nature.
- Walk the route to and from your child's favorite places (school, neighborhood friends, park), pointing out landmarks and safe places to go if someone is following him or her or if he or she needs help. Make a map with your child showing acceptable routes (to school, to the organization), using main roads and avoiding shortcuts or isolated areas.



What personal safety skills should my child have?

- Knows his or her full name, address, telephone number, and parents' names.
- Always checks first with parents or the person in charge before going anywhere or getting into a car, even with someone he or she knows.
- Always checks first with parents or a trusted adult before accepting anything from anyone, even from someone known to him or her.
- Always takes a friend when going places or playing outside without parents or supervision.
- Says NO if someone tries to inappropriately touch him or her.
- Leaves the area if someone behaves in a manner that makes him or her feel scared, uncomfortable, or confused.
- Knows it's okay to say NO.
- Knows who can help him or her if someone tries to inappropriately touch him or her or behaves in a manner that makes him or her feel scared, uncomfortable, or confused.

What should I discuss with my child about technology?

- Remind your child of your family's rules around technology and/or social media use. Share with them the following reminders:
 - We only talk online to people we know and have met in person.
 - We do not share any personal information online.
 - Don't post anything that you wouldn't say in front of your grandma (or someone else you highly respect.)
 - If anything bothers you or feels uncomfortable online, talk to your parents or to another trusted adult.

What should I discuss with my child about sexual abuse?

- Parents should provide children with an age-appropriate definition of abuse.
- Parents should tell their children that if someone tries to touch them or abuse them in any way, they should get away from that person as soon as possible.
- Parents should encourage children to tell them immediately if they have a problem or someone makes them feel uncomfortable.
- Parents should assure children that they will not get in trouble if they tell them about abuse.

What are some warning signs that a child feels uncomfortable?

- Increased seeking of affection from adults
- Reluctance to spend time with a previously favored adult



- Reluctance to go to activities that were previously enjoyed
- An uncharacteristic decrease in bathing and grooming
- Withdrawal from typical childhood activities
- Bed-wetting
- Inability to control bowels
- Preoccupation with sexual matters
- Increased masturbation
- Increased aggressiveness
- Nightmares and sleep disturbances

What are some common reasons children do not report abuse?

- Fear of rejection (No one will believe me.)
- Fear of punishment (I'll get in trouble.)
- Fear of abandonment (I'll have to leave home.)
- Fear of retaliation (He'll/She'll hurt me if I tell.)
- Fear of re-victimization (He'll/She'll think they can abuse me.)
- Shame (I was aroused, what's wrong with me?)
- Loyalty (He may get in trouble.)
- Confusion (What did I do to attract him/her?)
- Guilt (It was my fault. Mom and Dad told me not to do that.)

How should I respond if my child discloses abuse?

- Listen.
- Be sensitive to vague disclosures.
- Avoid expressing shock or outrage.
- Don't threaten or condemn the alleged perpetrator.
- Let the child know you believe him or her.
- Tell the child he or she was right to disclose.
- Assure the child the abuse was not his or her fault.
- Reassure the child that he or she will be safe.
- Avoid questions that could make the child feel responsible.
- Get as many details as the child is comfortable disclosing.
- Write down exactly what the child said.
- Contact authorities.



UNDERSTANDING AND WATCHING FOR GROOMING

WHAT IS GROOMING?

What is grooming?

Grooming is when someone builds a relationship, trust, and emotional connection with a child or young person so they can manipulate, exploit, and abuse them.

Children and young people who are groomed can be sexually abused, exploited, or trafficked.

Anybody can be a groomer, no matter their age, gender or race. Grooming can take place over a short or long period of time. Groomers may also build a relationship with the young person's family or friends to make them seem trustworthy or authoritative.

What are types of grooming?

Children and young people can be groomed online, in person or both – by a stranger or someone they know. This could be a family member, a friend or someone who has targeted them – like a teacher, faith group leader or sports coach. When a child is groomed online, groomers may hide who they are by sending photos or videos of other people. Sometimes this will be of someone younger than them to gain the trust of a “peer”. They might target one child online or contact lots of children very quickly and wait for them to respond.

The relationship a groomer builds can take different forms. This could be:

- A romantic relationship
- As a mentor
- An authority figure
- A dominant and persistent figure

A groomer can use the same sites, games, and apps as young people, spending time learning about a young person's interests and use this to build a relationship with them. Children can be groomed online through:

- Social media networks
- Text messages and messaging apps, like WhatsApp
- Email, text, voice and video chats in forums, games and apps



Whether online or in person, groomers can use tactics like:

- Pretending to be younger
- Giving advice or showing understanding
- Buying gifts
- Giving attention
- Taking them on trips or outings

Groomers might also try and isolate children from their friends and family, making them feel dependent on them and giving the groomer power and control over them. They might use blackmail to make a child feel guilt and shame or introduce the idea of “secrets” to control, frighten and intimidate.

It's important to remember that children and young people may not understand they have been groomed. They may have complicated feelings, like loyalty, admiration, love, as well as fear, distress and confusion.

What are signs of grooming?

It can be difficult to tell if a child is being groomed – the signs are not always obvious and may be hidden. Older children might behave in a way that seems to be “normal” teenage behavior, masking underlying problems.

Some of the signs you might see include:

- Being very secretive about how they are spending their time, including when online
- Having an older boyfriend or girlfriend
- Having money or new things like clothes and mobile phones that they can't or won't explain
- Underage drinking or drug taking
- Spending more or less time online or on their devices
- Being upset, withdrawn or distressed
- Sexualized behavior, language or an understanding of sex that is not appropriate for their age
- Spending more time away from home or going missing for periods of time

A child is unlikely to know they have been groomed. They might be worried or confused and less likely to speak to an adult they trust. If you are worried about a child and want to talk to him or her, we have advice on having difficult conversations. Please contact the Administration if you suspect grooming is taking place. We will keep all conversations confidential to the extent permitted by law and the bounds of any investigation.



**APPENDIX A:
SAR ACADEMY/
SAR HIGH SCHOOL
ANTI-HARASSMENT
POLICY**

WHO – The SAR Anti-Harassment Policy applies to all SAR students, their parents and all SAR Individuals. SAR Individuals includes all SAR employees (including, but not limited to, all full-time or part-time faculty, administrators, coaches, co-curricular staff, maintenance staff, cleaning staff, kitchen staff, guidance staff, nurses and office staff), volunteers, including the Board of Trustees, and employees of contracted service providers working for SAR.

WHERE/WHEN – The SAR Anti-Harassment Policy applies to all School sponsored and affiliated activities and events (including all related transportation) regardless of location. SAR may also discipline those engaging in harassment at any location at any time/location if such harassment causes a substantial disruption to the SAR community. All forms of technology, whether school or personally owned and regardless of location of use are subject to this policy.

WHAT – SAR prohibits any and all forms of harassment, including:

1. Bullying - any form of harassment that one should reasonably expect would demean, threaten or hurt (physically or emotionally). Bullying can be physical, verbal, demonstrative, or electronic. It can be of a sexual nature or otherwise. It can take place in person, over the phone, in cyberspace, or through an online communication, or any other means that communicates such harassment. It can be one-on-one, or group based. Both adults and children can be bullied or be the bully. Examples of bullying include, but are not limited to:

- Pushing, elbowing, poking, tripping, sitting on, kicking, or hitting
- Threatening another with physical harm
- Taunting others because of their physical traits including, but not limited to, age, voice, gender, height, weight, athletic skill, or any other personal characteristic
- Demeaning others' intellectual ability, academic performance, or grade level
- Taunting others about their social skills, i.e., making jokes at the expense of someone who is socially awkward
- Taunting others either verbally or using gestures about their actual or perceived sexual orientation
- Taunting others about their actual or perceived race, color, or national origin
- Using derogatory terms to refer to someone's race or ethnic background
- Excluding someone from a group or activity purposely to hurt them, i.e., refusing to let someone sit at a particular lunch table



WHAT (CONT'D)

- Damaging, hiding, taking of property
- Calling someone offensive or demeaning names
- Making jokes involving offensive stereotypes
- Posting on Facebook, or any other online social networking site, mean, offensive, demeaning, embarrassing, or threatening comments or images
- Texting, whether individually or as a group, mean, offensive, demeaning, embarrassing, or threatening comments or images
- Creating fake web pages or fake profiles or assuming another's identity in any social media context to create content likely to cause embarrassment or concern
- Spreading mean and hurtful rumors verbally or online
- Creating offensive graffiti

2. Hazing - an activity (regardless of willingness to participate) expected of someone joining/maintaining participation in any group that humiliates, degrades or risks harm or embarrassment to the individual. Examples of hazing include, but are not limited to, requiring someone to:

- Drink alcohol or use drugs
- Consume any vile or hazardous substance or allow such a substance to be smeared on the body
- Endure any physical striking, beating, burning, branding, or to engage in self-mutilation or requiring one to commit such acts upon another
- Endure acts of sexual abuse/assault
- Be subjected to abusive and demeaning speech
- Participate in acts of personal servitude
- Proceed through any type of gauntlet
- Suffer sleep deprivation
- Restrict personal hygiene
- Engage in indecent exposure
- Participate in any illegal activity
- Participate in physically dangerous activities such as exposing oneself to extreme weather conditions without appropriate protective clothing
- Submit to being tied up, abducted, or blindfolded
- Engage in any degrading or humiliating act, or any activity that violates any aspect of SAR codes of conduct



WHAT (CONT'D)

3. Sexual Harassment - any unwelcome communication or conduct of a sexual nature when (a) submission to such conduct is a condition or factor of employment or inclusion/exclusion from an educational experience or interferes with performance or participation in a school program or (b) where such conduct creates and intimidating, hostile or offensive working, learning, studying or school environment.

Sexual Harassment may occur in a single incident or be a series of incidents. It can occur between two adults, an adult and a student, two students, a group and an individual, or people of the same or different gender. Examples of Sexual Harassment include, but are not limited to:

- Intentional touching of a sexual or other private area of a person's body, i.e., grabbing, patting, poking, or slapping the breasts, buttocks, or groin area
- Supposed inadvertent contact with the sexual or private parts of the body, i.e., brushing up against someone's leg with one's groin area and acting as if it was unintentional
- Sexually oriented verbal kidding, teasing, or joking
- Making suggestive comments about physical characteristics or appearances
- Making offensive gender-based remarks, i.e., saying that a male is too feminine and that a female is too masculine
- Commenting or asking questions about someone's sexual experience or abilities
- Spreading rumors of a sexual nature
- Leering
- Sending suggestive or obscene letters or other writings, emails, notes, or invitations
- Subjecting a person to unwelcome sexual flirtations, advances, or propositions
- Requests to engage in sexual behavior
- Demands for sexual activity or other less overt coercive efforts to obtain sexual favors
- Sexual favoritism in the making of any decision (sexual favoritism occurs when any individual in a position of power, i.e., a supervisor, teacher, club president, or activity head, makes a decision based upon an individual's receptiveness to sexual advances.)



WHAT (CONT'D)

- Photographing, videotaping, or making any other visual or auditory recording of sexual activity or the sexual or intimate parts of a person's body without their knowledge and consent. If the person being photographed or recorded is a student, doing so even with their permission, as such images may constitute illegal child pornography and is not permitted under any circumstances.
- Sending via electronic means images of sexual activity or sexual or intimate parts of the body, also known as "sexting"
- Displaying to another any photograph, videotape, or other visual or auditory recording of sexual activity or the sexual or intimate parts of a person's body without that person's explicit consent
- Sexual Harassment includes any type of sexual advance, request for sexual favors, or other verbal, physical, demonstrative, or electronic conduct or communication of a sexual nature made by an SAR Individual, or other adult at SAR towards an SAR student, whether welcomed by that student or not, is sexual harassment and a violation of this policy.

4. Sexual Abuse/Assault - physical contact with a sexual or intimate part of the body without consent engaged in for the purpose of sexual gratification or to degrade or abuse. Lack of consent includes physical/verbal force or intimidation, explicit indication of lack of consent, or circumstances making it obvious that consent has not been granted (i.e., being too intoxicated to say "no", being asleep, not having the physical or mental capacity to consent). Children under age 17 cannot legally consent to any sexual conduct with an adult. Any romantic or sexual relationship between an SAR student and SAR Individual is prohibited and will result in the dismissal of the SAR Individual.

Sexual Abuse/Assault includes various forms of sexual intercourse as well as lesser forms of sexual touching. Sexual or intimate body parts include, but are not limited to: breasts, buttocks, genitals, the groin area, and upper thighs. This policy prohibits "sexting" between, and the showing of pornography to, any SAR student by an SAR Individual or other adult at SAR. Examples of Sexual Abuse/Assault include, but are not limited to:

- Touching, grabbing, pinching, rubbing, or fondling another person's buttocks, breasts, or genital area, whether over or under clothing, without consent as defined herein and engaged in for the purpose of sexual gratification or to degrade or abuse
- Rubbing one's genital area up against another person, whether over or under clothing, without consent as defined herein and engaged in for the purpose of sexual gratification or to degrade or abuse



WHAT (CONT'D)

- Touching another person with one's genitals without consent as defined herein and engaged in for the purpose of sexual gratification or to degrade or abuse
- Engaging in sexual behavior with someone too intoxicated to give informed consent
- Physically or verbally intimidating someone to engage in a sex act or sexual contact, whether done so expressly or implicitly

RESPONSE TO VIOLATIONS

1. Victims of harassment are strongly encouraged to report any violations of this policy.
2. Victims of harassment are encouraged, **but not required** to inform the harasser the behavior is unwelcome/offensive.
3. Prevention of harassment is the responsibility of the entire SAR community. SAR expects its students, employees, and volunteers to demonstrate a sense of responsibility and respect for all members of the SAR community. A non-SAR Individual (including any non-SAR staff member) who witnesses harassment is required to intervene on behalf of the victim and tell the harasser to stop the offensive behavior. A non-SAR Individual (including any SAR Student) who witnesses harassment is strongly encouraged to intervene on behalf of the victim.

REPORTING PROTOCOL (TO SCHOOL)

1. Anyone (including SAR students and parents) who is aware of a suspected or actual violation of this policy should tell any member of the SAR staff. SAR encourages reporting as soon as possible once one becomes aware of an incident, however, there is no time limit for making a report. The SAR staff member who receives the report of an alleged violation is required to report as specified in item 2, below.
2. An SAR Individual **must** promptly (within 25 hours) upon learning of a possible violation of this policy, whether as a victim, witness, or recipient of information from another party, or upon having reasonable cause to suspect that a violation of the policy may have occurred, report to one of the following people: their supervisor, a School Psychologist, an Assistant or Associate Principal, Director of General Studies, Director of Judaic Studies, Principal, President of the Board of Trustees. In all cases, if anyone other than the Principal is notified, that person must promptly inform the Principal of the report, unless the violation involves the Principal, in which case the Board of Trustees must be notified immediately.



REPORTING PROTOCOL (TO SCHOOL)

3. In cases of sexual abuse/assault, reports must be made directly to the Principal, an Assistant Principal or to the President of the Board of Trustees. In all cases, if anyone other than the Principal is notified, that person must promptly inform the Principal of the report. Once the Principal is notified of such a report, he or she must notify the President of the Board of Trustees. If the report involves the Principal, the Principal should not be notified, but rather the report should be made to the President of the Board of Trustees.
4. "Reasonable cause to suspect" may be predicated upon being told directly or indirectly that a violation has occurred, overhearing talk that a violation has occurred, or observing behavior which gives rise to a suspicion that a violation has occurred. The obligation to report is mandatory regardless of whether the alleged violation involves another SAR Individual, or a student, as the victim or the offender. When in doubt of whether you have sufficient reason to suspect a violation has or may have occurred, always err on the side of caution by reporting what you know or suspect.
5. The reporter's identity and the information reported will only be shared with those necessary to appropriately address the situation.

SAR POLICY ON REPORTING TO LAW ENFORCEMENT/OTHER AUTHORITIES

While recognizing that it is under no legal duty to do so, if the Principal has reasonable cause to suspect that an SAR Individual, or any other adult at SAR has committed a physical or sexual assault, as defined by the New York State Penal Law, against an SAR student, the Principal will report this information to State or Local law enforcement authorities.

AMNESTY, RETALIATION AND FALSE REPORTS

1. To minimize any hesitation a student may have to report a violation of the SAR Anti-Harassment Policy, while not overlooking any violation of other School policies (including, drug and alcohol policies), the School will place great weight on the positive impact of reporting an incident in deciding if any action is appropriate for the reporter's breach of another School policy.



AMNESTY, RETALIATION AND FALSE REPORTS (CONT'D)

2. Retaliation against anyone who in good faith reports a violation or suspected violation of this Anti-Harassment Policy, or who participates in the investigation of a complaint, is strictly prohibited. Any person who engages in such retaliation will be subject to disciplinary action including expulsion, if a student, or termination, if an SAR Individual. Anyone who either observes or becomes aware of such retaliatory behavior is strongly encouraged to report it to School authorities. SAR Individuals are required to do so.
3. SAR considers any allegation of harassment to be a serious matter. Therefore, if it is determined at the conclusion of an investigation that a reported violation was made in bad faith or that false information was knowingly provided regarding the complaint, SAR will take disciplinary action against such individual.

INVESTIGATION OF REPORTED INCIDENTS

1. After a report is made, the Principal will direct that an investigation be conducted by appropriate individuals who will be selected based upon the nature of the report and the individuals involved. This investigation may be conducted by SAR personnel, or by an outside investigator, depending on the facts and circumstances of the report. SAR and any outside investigator it retains will use the utmost discretion when conducting the investigation in order to minimize the chances that information about the matter will become known by unnecessary individuals.
2. As part of any investigation conducted pursuant to this policy, the reporter, the alleged victim (should that be someone other than the reporter), and the alleged offender may, but will not be obligated to, be interviewed separately about the reported facts. They will be advised of the prohibition against retaliation for making such a report and/or cooperating with an investigation, as appropriate. Furthermore, others who may have relevant knowledge may also be questioned, and they too will be reminded of SAR's anti-retaliation policy and the need for discretion. All SAR Individuals and all SAR students are under a duty to cooperate in any investigation. SAR will try to be as discreet as possible during the investigation and confidentiality will be maintained to the extent possible given the facts and circumstances of the complaint and the need to do a fair and thorough investigation.
3. Nothing in this policy is intended to limit the options of any person who believes that he or she has been subject to unlawful harassment or discrimination.



INVESTIGATION OF REPORTED INCIDENTS

(CONT'D)

4. At the conclusion of the investigation, and after the decision regarding what, if any, disciplinary or remedial action is to be taken has been made, the alleged victim and the alleged offender will be informed about the disposition of the matter.
5. Communication of any information regarding the matter to other members of the SAR community, whether that be faculty, staff, the student body, or parents/guardians, will be decided on a case-by-case basis with all due consideration being given to issues of privacy, confidentiality, and the emotional and physical well-being of all those involved.
6. Disciplinary decisions will be based on the facts and circumstances of each case and will take into account the offender's prior conduct and the wishes of the victim, although the latter will not be controlling as SAR must act in the interest of protecting the entire School community as well as the victim. In addition to being disciplined for engaging in an act of prohibited harassment or retaliation, SAR Individuals may also be disciplined for not following all aspects of this policy, including but not limited to, the reporting protocols. Possible disciplinary outcomes include, but are not limited to: a verbal warning, parental notification, loss of privileges, counseling, sensitivity training, probation, suspension, expulsion, dismissal, and/or notification to local or state authorities. In addition to disciplinary action with regard to the accused, SAR will consider what, if any, remedial actions should be taken with regard to the School as a whole to prevent similar offenses from occurring in the future.
7. SAR will keep records of all such investigations and such records will include, but not be limited to, information about the allegation as gathered from the reporter, the alleged victim, the person accused, and others interviewed. In addition, the decision reached regarding appropriate disciplinary action and any other relevant follow-up action engaged in by the School will be documented. These records will be maintained in accordance with applicable law. Documentation of harassment investigations is necessary to provide an accurate record regarding the reported violation and how it was handled, one that does not have to rely on the recollections of people whose memories may become inaccurate over the passage of time.



APPENDIX B: SHABBATONIM POLICIES AND PROCEDURES

SHABBATON/OVERNIGHT GUIDANCE FOR FACULTY

If faculty would like to have students to their home for a Shabbaton, they must abide by the following guidelines:

- Faculty must notify the Administration at least two weeks prior to hosting a Shabbaton (by end of day Friday, two weeks before) that they intend to host a Shabbaton and how many students they intend to host.
 - At least four students must be present at a Shabbaton. Groups of less than four students are prohibited.
 - Faculty must provide a list of the students that will be attending a Shabbaton by the end of the Thursday prior to a Shabbaton.
- If students will be staying at homes of community members other than the faculty member, the faculty member must provide the names, addresses, and phone numbers of the host families.
 - At least three students must stay in each host family's home. Groups of fewer than three students are prohibited.
 - Host families must be provided with a copy of the Host Family Shabbaton Guidance.
- If neighbors, friends, or adults outside of the teacher's immediate family will be joining for Shabbat, the faculty member should provide the School with advance notice of those guests.
- Faculty members must ensure that students do not have access to alcohol, drugs, or tobacco, including vaping products.
- In addition to the foregoing, faculty members must abide by the Host Family Shabbaton Guidance.

I have read the Faculty Shabbaton Guidance and the Host Family Shabbaton Guidance and agree to comply with all rules. I understand that the content may be changed at any time and the School will notify me of these changes. I understand that it is my responsibility to notify the Administration if any students are in any way disrespectful.

Teacher Name: _____

Teacher Signature: _____ Date: _____



HOST FAMILY SHABBATON GUIDANCE

Thank you for hosting SAR Academy/SAR High School students for a Shabbaton. In order to ensure the safety of our community and the best experience for both students and host families, all host families must agree to abide by the following guidelines at all times. Thank you so much for agreeing to open your home to our students to make this a meaningful Shabbat.

- At least three students must be staying at each host family's home. Groups of less than three students are prohibited.
- If a host family is unknown to the School Administration, they must be recommended in writing by a member of the community.
- Host families must review and sign the Host Family Shabbaton Guidance document and familiarize themselves with the expectations for students.
- Host families are encouraged to report to the School if students are in any way disrespectful.
- Students must have separate sleeping quarters from any adults in the home. Host families should not enter the bedroom that students are sleeping in except to wake them or monitor behavior, which should be done from the doorway.
- Students must have privacy. There may be no more than one student in the bathroom at one time when privacy is required; however, more than one student may be in the bathroom for use of the mirror and general hygiene (i.e., brush teeth or hair, apply makeup, etc.).
- Students may not enter the bedroom of the host family under any circumstances.
- Generally, students of the opposite sex must not stay in the same home. Occasionally, exceptions may be made if authorized in writing by a School Administrator. If an exception is approved, students of the opposite sex must have separate sleeping quarters.
 - Students of the same sex may share a double bed, but only two students may sleep in the bed, and only if comfortable.
- Generally, students will share a room with at least one other student. Occasionally, exceptions may be made if authorized in writing by a School Administrator.
- Host families must ensure that students do not have access to alcohol, drugs, or tobacco, including vaping products, or any other illegal substances.
- Students will be asked about their experience following a Shabbaton, including their interactions with the host family.
- If a host family wishes to stay in contact with a student following a Shabbaton, they must seek permission from the School and the student's parents before contacting the student.

I have read the Host Family Shabbaton Guidance and agree to comply with all rules. I understand that the content may be changed at any time and the School will notify me of these changes. I understand that it is my responsibility to notify the School if any students are in any way disrespectful.

Host Family Name: _____

Host Family Signature: _____ Date: _____





IT'S NOT JUST WHAT YOU LEARN.
IT'S WHO YOU BECOME.

SAR ACADEMY
Jesselson Campus

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www.saracademy.org

SAR HIGH SCHOOL

Dedicated to the memory of J.J. Greenberg z"l

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