

Child and Youth Protection

POLICIES and
PROCEDURES



GILMAN

Keeping children and youth safe is a responsibility all adults must share. Gilman School recognizes the importance of this duty and is committed to promoting the well-being and ongoing safety of children and youth. Adults have a legal and ethical responsibility to respond to and report any ongoing or past suspected child abuse, child neglect, or misconduct with a child or youth. Gilman School complies with all Maryland state laws regarding reporting suspected child abuse or neglect of a child and cooperates with civil authorities investigating reports of suspected child abuse or neglect by anyone, including but not limited to school personnel. Under Maryland law, any person who has reason to believe a child has been subjected to recent, ongoing, or past abuse or neglect must report the suspected abuse or neglect to civil authorities, even if the victim is now over 18 years old and even in cases where the perpetrator is deceased.

This document covers conduct which occurs both on and off Gilman School (School) grounds, including field trips, athletic activities, club events, programs, and any other School-related function, as well as interactions between school personnel and a child/youth/student in off hours. Any questions about the Policies should be directed to the School's Director of Student Safety Oversight.

All adults are encouraged to contact the Head of School and/or the Director of Student Safety Oversight, if they have any concerns about the behavior or conduct of any school personnel (employees and volunteers). Children and youth are encouraged to speak with their parent and/or a trusted adult at Gilman School if they have concerns about the behavior or conduct of any school personnel. It is the responsibility of that adult to notify the Head of School and/or the Director of Student Safety Oversight.

Allegations of child abuse, child neglect, or misconduct with a child or youth will be taken seriously and handled as appropriate to the situation. Upon receiving a concern about the behavior or conduct of school personnel, the Head of School and/or the Director of Student Safety Oversight will report suspected child abuse or neglect to civil authorities, if it has not yet been reported. Because Gilman School cooperates with civil authorities, the School's internal investigation might be delayed pending an investigation by the Department of Social Services and/or law enforcement. The report to and investigation by civil authorities will occur before any internal investigation takes place. Internal investigations will be handled with discretion, maintaining confidentiality to the extent possible. Recognizing the importance of communicating with the Gilman community about child and youth protection matters, the Director of Student Safety Oversight will coordinate with the Head of School and other relevant Gilman administration to ensure the Gilman community receives timely, factual, relevant, and appropriate communication.

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I. Definitions

- A. *Abuse*: The physical or mental injury of a Child under circumstances that indicate that the Child's health or welfare is harmed or at substantial risk of being harmed by a parent; a household member or family member; a person who has permanent or temporary care or custody of the Child; a person who has responsibility for supervision of the Child; or a person who, because of the person's position or occupation, exercises authority over the Child; or Sexual Abuse of a Child, whether physical injuries are sustained or not. (MD Code, Family Law, §5-701)
- B. *Administration*: Includes Gilman School's Head of School, Head of Lower School, Head of Middle School, Head of Upper School, and Director of Student Safety Oversight.
- C. *Adult*: Any person who is 18 years of age or older.
- D. *Application*: Gilman School Application for Employment or Gilman School Application for Volunteer Service.
- E. *Assault*: A criminal offense that involves intentionally or recklessly harming another person, including striking or other non-consensual touching of another person and causing injury to that person. The reporting requirements for Assault are different from the reporting requirements for the Abuse or Neglect of a Child. Abuse must always be reported to Civil Authorities.
- F. *Child*: Any person under 18 years of age.
- G. *Civil Authorities*: Law enforcement or Child Protective Services of the state. In the state of Maryland, Department of Social Services or Child Protective Services, the police, and State's Attorney's Office.
- H. *Criminal Background Investigation*: The submission of fingerprints to the state and FBI to obtain a comprehensive criminal record check against the FBI's national database, which will include arrest and conviction history. It is processed through the Criminal Justice Information Service (CJIS) department of the Federal Bureau of Investigation (FBI) and the State of Maryland Department of Public Safety and Correctional Services. Background checks are processed through state registries and the National Sex Offender Registry.
- I. *Criminal History Screening*: The comprehensive process of checking the criminal history record of a volunteer applicant or current volunteer through a third-party vendor. The internet-based criminal history screening includes a name-based search, verification of social security number, a search of the national sex offender registry; state sex offender registry; state and national criminal history registries, repositories, and databases. A search of the criminal history registry for each state where a selected applicant or current employee has resided in the last five years is included in the criminal history screening.
- J. *Director of Student Safety Oversight (SSO)*: Gilman School employee who assists Gilman School Administration in overseeing the proper implementation and compliance with this document and the Code of Conduct.

- K. *Disqualifying Criminal Offense*: Any conviction, felony or misdemeanor, of the following crimes (or any substantially equivalent criminal offense regardless of the specific words by which it may be identified by law) will disqualify a selected applicant from employment or volunteer service at Gilman School or disqualify current School Personnel from continued employment or service at Gilman School:
- i. Sexual abuse, physical abuse, or neglect of a child
 - ii. Rape/sexual assault, including conspiracy to commit rape/sexual assault
 - iii. Sexual exploitation, such as sex trafficking or possession, receipt, or distribution of child pornography
 - iv. Kidnapping
 - v. Voyeurism
- L. *Misconduct with a Child or Youth*: Actions that compromise the safety and well-being of a Child or Youth or violate appropriate boundaries with a Child or Youth. For purposes of this policy, Misconduct with a Child or Youth does not include Criminal Abuse or Neglect. Misconduct with a Child or Youth does not meet the threshold of being reportable to Civil Authorities but may result in disciplinary action, up to and including termination.
- M. *Neglect*: The leaving of a Child unattended or other failure to give proper care and attention to a Child by a parent, a household member or family member, a person who has permanent or temporary care or custody of the Child, a person who has responsibility for supervision of the Child, or a person who, because of the person's position or occupation, exercises authority over the Child under circumstances that indicate that the Child's health or welfare is harmed or placed at substantial risk of harm; or mental injury to the Child or a substantial risk of mental injury.
- N. *Physical Abuse*: Any act by a parent, a household member or family member, a person who has permanent or temporary care or custody of the Child, a person who has responsibility for supervision of the Child, or a person who, because of the person's position or occupation, exercises authority over the Child who inflicts or allows someone to inflict physical injury or non-accidental trauma on the Child.
- O. *Personnel*: Includes all Gilman School employees and volunteers.
- P. *Sexual Abuse*: Any act that involves sexual molestation or exploitation of a Child by a parent, a household member or family member, a person who has permanent or temporary care or custody of the Child, a person who has responsibility for supervision of the Child, or a person who, because of the person's position or occupation, exercises authority over the Child; or sex trafficking of a Child by any individual. Sexual molestation or exploitation includes allowing or encouraging a Child to engage in obscene photography, films, poses, or similar activity; pornographic photography, films, poses, or similar activity; or prostitution; incest; rape; sexual offense in any degree; sodomy; and unnatural or perverted sexual practices.

- Q. *Third-Party Independent Contractor/Agency/Organization*: Any independent contractor, agency, organization, company, or vendor (and/or their subcontractors), other than Gilman School Personnel, who provides direct services or who works directly with the school or its students to provide services to any School program, activity, or setting that may involve contact with students.
- R. *Volunteer*: Any person who performs a service or provides assistance willingly and without any compensation for Gilman School.
- S. *Youth*: Any student of Gilman School. For purposes of this policy, the definition of Youth also includes current Gilman students who are 18 years old and older.

II. Reporting Suspected Abuse and Neglect to Civil Authorities and Gilman School

- A. Gilman School takes any allegation of Abuse or Neglect of a Child very seriously and will respond promptly. Gilman School complies with all Maryland state laws regarding reporting suspected Abuse and Neglect of a Child to Civil Authorities and cooperates with Civil Authorities investigating reports of suspected Abuse or Neglect by anyone, including but not limited to School Personnel.
- B. **School Personnel are mandatory reporters pursuant to Maryland Law.** School Personnel shall immediately notify the Head of School and/or Director of SSO of any suspected Abuse or Neglect, and it shall be immediately reported to Maryland Child Protective Services Hotline at 1-800-917-7383 or to local law enforcement by School Personnel, regardless of where the incident occurred or by whom it was committed. Gilman School will not investigate an allegation of Abuse or Neglect before making the required report to Civil Authorities. Documentation of the oral report to Civil Authorities shall be made. (MD Code, Family Law, § 5-704)
- C. School Personnel should only obtain the minimal facts required by law or reasonably necessary in order to make a full and meaningful report, upon disclosure of Abuse or Neglect.
- D. Pursuant to Maryland Law, mandatory oral reports to Maryland Child Protective Services by School Personnel must be followed within 48 hours by a written report to the local office of Child Protective Services and copy of the written report to the local State's Attorney's Office.
- E. School Personnel are not required to notify a parent, legal guardian, or caregiver of a Child before or after making a report to Civil Authorities. In some cases, alerting a parent, legal guardian, or caregiver may hinder the Civil Authorities' investigation. In consultation with the Civil Authorities, the Head of School and/or the Director of SSO will determine when it is appropriate to communicate with a parent, legal guardian, or caregiver. In the case that an accused parent, legal guardian, or caregiver is School Personnel and involved in an allegation with their own Child, the Head of School and/or the Director of SSO will defer to the Civil Authorities when contact may be made with the School Personnel regarding the allegations and/or when communication may be

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had with the non-offending caregiver. School Personnel are to refer any questions to the Head of School and/or the Director of SSO.

- F. Nothing set forth in this document is intended to limit or delay mandated reporting to the Civil Authorities. Questions about whether to report should be discussed with the Head of School and/or the Director of SSO as soon as possible. Remember it is always best to err on the side of caution and report. No individual may intentionally prevent or interfere with the making of a report of suspected Abuse or Neglect to Civil Authorities. (MD Code, Family Law, § 5-705.2)
- G. Gilman School understands it may be difficult to report suspected Abuse or Neglect of a Child by School Personnel. A report may be made anonymously by omitting any identifying information on the online reporting form. However, please be aware that this may limit Civil Authorities and Gilman School's ability to respond to the information provided. If a reporter wishes to remain anonymous, then identifying information fields may be left blank.
- H. Gilman School will not take any retaliatory personnel action, such as demotion, disciplinary action, termination, or transfer, against any School Personnel because of a report of suspected Abuse or Neglect to Civil Authorities.
- I. Any failure to act or report suspected Abuse or Neglect can result in Gilman School Personnel being held criminally and civilly accountable as well as a loss of license, and/or a loss of employment or volunteer service.
- J. To respect the privacy of those involved, privacy and confidentiality should be maintained, to the extent possible, consistent with the mandated reporting requirements and Gilman School's Policies and Procedures for Child and Youth Protection, considering:
 - i. The need to advocate for those who are victims.
 - ii. The need to provide appropriate outreach to victims.
 - iii. The need to be in compliance with federal and state laws.
 - iv. The right of Gilman School Personnel to be treated fairly.
 - v. The need by Civil Authorities and/or the Head of School and/or the Director of SSO to fairly investigate complaints of Abuse or Neglect or any form of Misconduct with a Child or Youth.
 - vi. The need to make a report to the Head of School and/or the Director of SSO in a timely manner.
- K. Persons making reports of Abuse or Neglect will not suffer prejudice, retaliation, or discrimination because of having submitted a report. Retaliation is grounds for immediate termination from Gilman School.
- L. Any School Personnel who observes or becomes aware of a violation of Gilman School's Child Protection Policies and Procedures must immediately report that violation to the Head of School and/or the Director of SSO.

- M. Should Gilman School Personnel be the subject of a report of suspected Abuse or Neglect, they are prohibited from having contact with Gilman Children and Youth during the course of the investigation. Every effort will be made to protect the rights and privacy of the Personnel and all individuals involved in the investigation, and to resolve the matter as quickly as possible. Depending on the circumstances, the Personnel may be placed on administrative leave pending the outcome of the investigation. Decisions regarding the leave, including whether paid or unpaid, will be made by the Head of School, Director of Human Resources, and Director of SSO.
- N. Past incidents of Abuse or Neglect that are alleged to have occurred when a person was under the age of 18 years old must be reported to Civil Authorities, even if the person is now over 18 years old, and even in cases where the perpetrator is now deceased. In addition to Gilman School Personnel making a report to the applicable Civil Authorities, School Personnel shall inform the alleged survivor of their independent right to report to Civil Authorities.
- O. Gilman School Personnel should respond promptly to any requests for additional information from Civil Authorities and should provide the requested information. To the extent time and circumstances permit, any such request for additional information should be handled by the Head of School and/or the Director of SSO.
- P. In cases where the incident(s) are alleged to have occurred outside of Maryland and the victim currently resides outside of Maryland, then a report should be made to the local office of Child Protective Services in Maryland. The local office will forward the report to the appropriate agency outside of Maryland that is authorized to receive and investigate reports of suspected Abuse or Neglect.
- Q. When programs or events are held outside the United States, all appropriate actions should be taken to comply with Gilman School's reporting policies, considering the venue of the program or events, the resources and facilities available, and the laws of the country of the program or events.
- R. Beyond School Personnel, **any adult person** who has reason to believe a Child has been subjected to Abuse or Neglect shall make a report immediately to the Maryland Child Protective Services Hotline at 1-800-917-7383 or local law enforcement. (MD Code, Family Law, § 5-705). In addition to reporting to Civil Authorities when required, any person who suspects the Abuse or Neglect of a Child by Gilman School Personnel must immediately notify the Head of School and/or the Director of SSO by email, telephone, or the online reporting form. If the report is received by email or telephone, a Gilman School Incident Report form will be completed by the Head of School and/or Director of SSO. When submitting a report online, the reporter is encouraged to provide as much information as possible so the Head of School and/or the Director of SSO can effectively respond to the report.
- S. Any person who reports suspected Abuse or Neglect in good faith cannot be held civilly or criminally liable for making a report to Civil Authorities.
- T. Any person who has knowledge of an incident involving the production, possession, distribution, or receipt of child pornography must make a report to the applicable Civil Authorities as soon as possible.

- U. Any person who has reason to believe a Child resides with or is in the regular presence of an individual who poses a substantial risk of Sexual Abuse to the Child, should also notify the local office of Child Protective Services.
- V. All reports and documentation regarding Abuse or Neglect by School Personnel will be maintained by the Office of SSO. Only Gilman School's Office of SSO and Human Resources may maintain files or records for School Personnel. All files will be in a confidential, safe, and secure location with controlled access. Files may be reviewed by appropriate Gilman School Administration but may not be copied or removed from where they are maintained.

III. Reporting Misconduct With a Student to Gilman School

- A. Gilman School takes any allegation of Misconduct with a Child or Youth very seriously and will respond promptly. Misconduct with a Child or Youth includes actions that are a violation of the School's Code of Conduct, compromise the safety and well-being of a Child or Youth, or violate appropriate boundaries with a Child or Youth. For purposes of this policy, Misconduct with a Child or Youth does not include Abuse or Neglect. Misconduct with a Child or Youth does not meet the threshold of being reportable to Civil Authorities but may result in disciplinary action, up to and including termination.
- B. Misconduct with a Child or Youth by Gilman School Personnel must immediately be reported to the Head of School and/or Director of SSO by email, telephone, or the online reporting form. If the report is received by email or telephone, a Gilman School Incident Report form will be completed by the Head of School and/or Director of SSO. When submitting a report online, the reporter is encouraged to provide as much information as possible so the Head of School and/or the Director of SSO can effectively respond to the report. Gilman School respects the sensitive nature of all reports.
- C. Gilman School understands it may be difficult to report Misconduct with a Child or Youth by School Personnel. A report may be made anonymously by omitting any identifying information on the online reporting form. However, please be aware that this may limit Gilman School's ability to respond to the information provided. If a reporter wishes to remain anonymous, then identifying information fields may be left blank.
- D. After a review and consultation between the Head of School and the Director of SSO, a determination will be made if a report to Civil Authorities is required, if it has not already been made. The policies and procedures outlined in this document must be followed.
- E. Persons making a report of Misconduct with a Child or Youth will not suffer prejudice, retaliation, or discrimination because of having submitted a report. Retaliation is grounds for immediate termination from Gilman School.

- F. Depending on the circumstances, School Personnel may be placed on administrative leave pending the outcome of an investigation. Decisions regarding the leave, including whether paid or unpaid, will be made by the Head of School, Director of Human Resources, and Director of SSO.
- G. All reports and documentation regarding Misconduct with a Child or Youth by School Personnel will be maintained by the Office of SSO. Only Gilman School's Office of SSO and Human Resources may maintain files or records for School Personnel. All files will be in a confidential, safe, and secure location with controlled access. Files may be reviewed by appropriate Gilman School Administration but may not be copied or removed from where they are maintained.

IV. Investigation by Gilman School

- A. Upon receiving a report of Abuse or Neglect suspected to have been committed by Gilman School Personnel, **the report to and investigation by Civil Authorities will occur before any internal investigation begins.** Once Gilman School is given permission by Civil Authorities, the Director of SSO will assist the Head of School in investigating and providing immediate care to the victim/survivor(s), their families, and members of the affected community. Investigations take place and care is extended whether the Abuse, Neglect, or Misconduct with a Child or Youth was recent or occurred in the past. The Director of SSO will speak with the person(s) making the report and others who may have relevant information in order to obtain as clear and detailed information as possible. Because allegations of Misconduct with a Child or Youth are not reportable to Civil Authorities, an investigation may begin immediately.
- B. After receiving the initial report, the Head of School and Director of SSO will determine the specific steps needed to proceed, guided by the following values:
 - The safety and protection of the victims/survivors.
 - A fair and honest search for the truth.
 - The need to provide appropriate outreach to victims/survivors.
 - The need to be in compliance with civil and criminal laws.
 - The right of all persons to be treated fairly.
 - The need to investigate and take appropriate action in all reports of Abuse or Neglect, or any form of Misconduct with a Child or Youth suspected to have been committed by Gilman School Personnel.
- C. The Director of SSO will explain, as fully as possible, the process that is being undertaken to the person who has reported alleged Abuse, Neglect, or any form of Misconduct with a Child and Youth committed by Gilman School Personnel. The Director of SSO will advise the person of the reporting requirements to Civil Authorities. The person will be informed of their right to also report to Civil Authorities.

- D. Pending the outcome of an investigation, any Gilman School Personnel accused of Abuse or Neglect will be placed on administrative.
- E. As a result of the investigation, appropriate personnel action may include any action up to and including termination of Gilman School Personnel or revocation of any right, privilege, or permission to attend/participate in Gilman School events and programs.
- F. In those instances when there is a credible allegation of Abuse or Neglect by Gilman School Personnel, the Gilman School employee or volunteer will be permanently relieved of all employment or volunteer service with Gilman School except and unless the allegation is subsequently determined to be unfounded.
- G. After the investigation of Abuse, Neglect, or Misconduct with a Child or Youth, Gilman School will provide appropriate outreach, personnel action, and communications with the community consistent with the policies and procedures outlined in this document and the School's Human Resources policies.
- H. Any report of Assault or Sexual Assault by a Child or Youth towards another Child or Youth should also be responded to and investigated promptly. The course of action will depend on the nature of the offense, the age of the Child or Youth involved, the behavioral history of the Child or Youth who committed the offense, and the likelihood of the offense being repeated.

V. Service Eligibility of Gilman School Personnel

- A. Gilman School will exclude from employment or volunteer service anyone who has received a credible allegation against them of Sexual Abuse, Physical Abuse, or Neglect of a Child; been found responsible for an "unsubstantiated" or "indicated" disposition for a Child Abuse or Neglect investigation by the Department of Human Services/Child Protective Services; been charged with or convicted of Sexual Abuse, Physical Abuse, or Neglect of a Child; or received a criminal conviction for a Disqualifying Criminal Offense.
- B. Gilman School Personnel are expected to act in a manner that is consistent with federal and state laws, this document, and the values of Gilman School.
- C. Gilman School Personnel must contact the Head of School and/or the Director of SSO immediately if it is learned that anyone accused or convicted of Sexual Abuse, Physical Abuse, or Neglect of a Child; or Misconduct with a Child or Youth is involved in any capacity at Gilman School. This requirement is in addition to the obligations discussed below regarding reporting to Civil Authorities and screening of School Personnel.
- D. Because Gilman School cooperates with Civil Authorities, School Personnel should only proceed in accordance with the direction of Civil Authorities and the Head of School. School Personnel may not initiate any kind of investigation before contacting Civil Authorities and the Head of School and the Director of SSO. To avoid interfering with potential criminal investigations, permission

from the appropriate Civil Authorities should be sought to communicate with the alleged victim or alleged offender.

- E. In the rare case when it is not possible to receive guidance from Civil Authorities and the Head of School immediately, Gilman School Personnel should intervene when it is believed that School Personnel are putting a student in harm's way or engaging in behavior that is a violation of this document.
- F. Restrictions, including suspension from employment or volunteer service, may be placed on any Gilman School Personnel accused of Abuse or Neglect, or any form of Misconduct with a Child or Youth pending a final determination of an investigation by Civil Authorities and/or the Head of School.
- G. During the course of employment or volunteer service, any Gilman School Personnel arrested or convicted for any crime (excluding moving violations) or named in an investigation involving Child or Youth must provide written notice to the Director of SSO no later than 72 hours after the arrest, conviction, or investigation notification. Depending on the facts, convictions and/or investigation findings may result in termination of employment, volunteer service, and/or revocation of any right, privilege, license, or permission to attend/participate in any Gilman School event and program.

VI. Screening and Selection

Gilman School is committed to healthy conduct with students and seeks to engage only competent, qualified people as Gilman School Personnel. To protect students, School Personnel are screened for their fitness to work with students. All School Personnel will be accountable for the proper implementation and compliance with this document and the Code of Conduct for Gilman School Personnel.

A. Gilman School Employees – Pre-Employment

- i. All requirements of Gilman School's Human Resources policies and this document must be completed with required documentation before a selected applicant may begin employment at Gilman School.
- ii. The Director of SSO and the Director of Human Resources will confirm that the screening requirements have been completed. If an applicant fails to complete any of the requirements, then they may not begin their employment at Gilman School.
- iii. All applicants for employment must complete an online Gilman School employment application.
- iv. Selected applicants for employment must be interviewed by the hiring supervisor before an offer of employment is extended. An interview must be documented.

- v. Selected applicants for employment must provide employment history and professional references on the online Gilman School employment application. A minimum of three references must be checked and documented by the Director of Human Resources or the Director of SSO before an offer of employment is extended.
- vi. Selected applicants for employment must complete a Criminal Background Investigation (fingerprint check). A Criminal Background Investigation is completed following the acceptance of a job offer and before a selected applicant may begin employment at Gilman School.
- vii. Selected applicants for employment must complete and submit a Child Protective Services Background Clearance Form to the local DSS office or to the Maryland Department of Human Resources and provide the Director of SSO a copy of the submitted form before the selected applicant may begin employment at Gilman School.
- viii. The Director of Human Resources, with the assistance of the Director of SSO, will review any questionable or unfavorable information learned from the application, interview, Criminal Background Investigation, or Child Protective Services background clearance of a selected applicant. This would include if the selected applicant has an open investigation of Sexual Abuse, Physical Abuse, or Neglect of a Child; received a credible allegation against them of Sexual Abuse, Physical Abuse, or Neglect of a Child; found responsible for an “unsubstantiated” or “indicated” disposition for a Child Abuse or Neglect investigation by the Department of Human Services/Child Protective Services; been charged with or convicted of Sexual Abuse, Physical Abuse, or Neglect of a Child; or received a criminal conviction for a disqualifying criminal offense.
- ix. In such a situation, the applicant may not begin employment until written approval is received from Gilman School’s Head of School. The employment or service of an applicant is always conditioned on receipt of acceptable reports referenced above.

B. Gilman School Employees – Employment

- i. During the course of employment, any employee who has an open investigation of Sexual Abuse, Physical Abuse, or Neglect of a Child; receives a credible allegation against them of Sexual Abuse, Physical Abuse, or Neglect of a Child; is found responsible for an “unsubstantiated” or “indicated” disposition for a Child Abuse or Neglect investigation by the Department of Human Services/Child Protective Services; is charged with or convicted of Sexual Abuse, Physical Abuse, or Neglect of a Child; or is convicted of any crime (excluding moving violations) has five calendar days to disclose to the Director of SSO. Depending on the facts, the investigation, allegation, finding, or conviction may result in disciplinary action, up to and including termination of employment. Any action taken will be in consultation with the Director of Human Resources.
- ii. All Gilman School employees must complete a Child Protective Services Background Clearance, at a minimum, every five years and must be reevaluated for their suitability to work at Gilman School based on the results of their Child Protective Services Background Clearance. The Director of Human Resources and the Director of SSO will review any questionable or

unfavorable results. Any action taken, up to and including termination of employment, will be in consultation with the Director of Human Resources.

C. Gilman School Volunteers

- i. All requirements of this document must be completed with required documentation before volunteers may begin volunteer service at Gilman School.
- ii. The Director of SSO will confirm that the screening requirements have been completed. If a volunteer applicant fails to complete any of the requirements, then they may not begin their service at Gilman School.
- iii. All applicants for volunteer service must complete an online Gilman School volunteer application.
- iv. If the applicant is not a parent or caregiver of a student, then the applicant must be interviewed by the appropriate School employee. Documentation of the interview should be maintained by the Director of SSO.
- v. All applicants for volunteer service must complete a Criminal History Screening before they may begin serving at Gilman School and repeat the screening every year in order to be reevaluated for their suitability to serve based on the results. The Director of SSO will review any questionable or unfavorable results which may result in the termination of the person's service at Gilman School.
- vi. The Director of SSO will review any questionable or unfavorable information learned from the application, interview (if applicable), or Criminal History Screening of an applicant. In such a situation, the applicant may not begin serving until written approval is received from Gilman School's Head of School. The service of an applicant is always conditioned on receipt of acceptable reports referenced above.
- vii. During the course of serving at Gilman School, any volunteer who has an open investigation of Sexual Abuse, Physical Abuse, or Neglect of a Child; received a credible allegation against them of Sexual Abuse, Physical Abuse, or Neglect of a Child; found responsible for an "unsubstantiated" or "indicated" disposition for a Child Abuse or Neglect investigation by the Department of Human Services/Child Protective Services; been charged with or convicted of Sexual Abuse, Physical Abuse, or Neglect of a Child; or convicted of any crime (excluding moving violations) has five calendar days to disclose to the Director of SSO. Depending on the facts, the investigation, allegation, finding, or conviction may result in termination of volunteer service at Gilman School.
- viii. A Criminal History Screening completed by another institution or organization may not be substituted for Gilman's Criminal History Screening.

D. Coaches

- i. All requirements of this document must be completed with required documentation before a coach may begin serving at Gilman School.

- ii. Coaches must complete a Criminal Background Investigation (fingerprint check). Results must be received before the assigned trip. The Director of SSO will confirm that these screening requirements have been completed. If an applicant fails to complete any part of the requirements, then the applicant may not serve as a coach.
- iii. A coach who receives any remuneration in exchange for working with students at Gilman School will be considered an employee. Therefore, all requirements of this document regarding employees must be completed with required documentation on or before a coach may begin employment at Gilman School.
- iv. All coaches who will not receive any remuneration in exchange for working with students at Gilman School must complete all screening requirements for volunteers.

E. Volunteers for Overnight Trips

- i. All volunteers for overnight trips must complete all screening requirements for volunteers.
- ii. In addition, the volunteers for overnight trips must complete a Criminal Background Investigation (fingerprint check). Results must be received before the assigned trip.

F. School Parents or Caregivers Who Have Infrequent or Occasional Interactions with Students

- i. School Parents or Caregivers Who Have Infrequent or Occasional Interactions with Students are not required to complete the same screening requirements as those who volunteer at Gilman School. These infrequent or occasional interactions include attendance at school assemblies, special events, athletic games, class parties, parent-teacher conferences, and meetings with School Personnel.
- ii. School Parents or Caregivers Who Have Infrequent or Occasional Interactions with Students should always be accompanied by or remain in close proximity to Gilman School Personnel who have completed all of the screening requirements.

G. Third-Party Independent Contractor/Agency/Organization

- i. Any third-party independent contractor/agency/organization must complete thorough Criminal History Screenings of its employees, agents, volunteers, and subcontractors who potentially will have contact with Gilman School students in any setting. The third party must maintain documentation for all Criminal History Screenings in its files and must furnish this documentation to Gilman School upon request. Gilman School, in its sole discretion, may require additional measures to be implemented in relation to the third-party independent contractor/agency/organization whenever Gilman School determines that such measures are warranted based upon the nature of the services provided and/or the degree of interaction with students.
- ii. Any third-party independent contractor/agency/organization must complete safe environment training provided by Gilman School or another equivalent child protection training.
- iii. All advertisements, flyers, forms, and any other communications distributed by a third party's program, activity, or event for Gilman School must include a statement that the third party's

program, activity, event is not sponsored by or affiliated with Gilman School. The statement is to read as follows:

The Name of Third Party's program, activity, event is not sponsored by or affiliated with Gilman School. The activities of Name of Third Party are not directed, supervised, or controlled by Gilman School.

VII. Training and Education of Gilman School Personnel and Students

- A. Gilman School is committed to education on how to prevent, recognize, and report Abuse and Neglect of Children and Youth, and any form of Misconduct with a Child or Youth at Gilman School. By educating Adults, risks to students are greatly reduced because there is a better understanding and awareness of the issues of Abuse, Neglect, and Misconduct.
- B. Gilman School Personnel, including employees and volunteers, must complete safe environment training annually, and applicants for School Personnel positions must complete safe environment training before beginning employment or volunteer service. Training documentation will be reviewed and maintained by the Director of SSO.
- C. Training should include responsibilities as a mandated reporter, the process for making a report of suspected Abuse or Neglect, including documentation and confidentiality; the process for reporting Misconduct with a Child or Youth; the signs and symptoms of Abuse and Neglect; the consequences for failure to report; and appropriate boundaries and interactions with children.
- D. Due to the sensitive nature of the subject matter, some survivors of Abuse or Neglect may not feel comfortable completing safe environment training. Gilman Personnel in this situation may request to receive the materials in an alternative way. Documentation of alternative completion will be kept in the same manner as the records above.
- E. Training or education completed at another institution or organization may not be substituted for Gilman's training.
- F. Safe environment education must be provided to all Gilman School students (grades pre-k-12) annually. The School's Department of Wellness and Support will update the curricula as needed.

VIII. Compliance With Gilman School's Child and Youth Protection Policies and Procedures

- A. All Gilman School Personnel must read this document as well as the Code of Conduct for Gilman School Personnel and must acknowledge their responsibility to comply. Documentation must be reviewed and maintained by the Director of SSO.
- B. It is the expectation that all Gilman School Personnel comply with this document and contribute to a safe and healthy environment for those served by Gilman School.
- C. Gilman School Administration, with the assistance of the Director of SSO, are responsible for ensuring that all Gilman School Personnel are in compliance with the requirements of this document, and all required documentation is maintained.
- D. Gilman School's Human Resources and Office of SSO must maintain appropriate confidentiality regarding sensitive information and make sound judgments regarding an applicant's eligibility for employment or volunteer service in accordance with these policies.
- E. The Director of SSO maintains all records or reports received, whether deemed to be credible or not, and maintains records of all actions taken in response to such reports. For the protection of all persons involved, records will be kept in a confidential, safe, and secure location with controlled access. Records and reports will be kept indefinitely.
- F. Failure to follow and document all requirements of this document may result in disciplinary action, up to and including termination.
- G. Gilman School Administration and/or designated staff will provide training to appropriate Gilman School Personnel on the policies and procedures outlined in this document.
- H. Questions regarding the interpretation or application of this document are encouraged and should be directed to the Director of SSO.
- I. Gilman School shall communicate the key components of this document to families and all Gilman School Personnel.
- J. Gilman School's Child and Youth Protection Policies and Procedures will be readily available publicly on the Gilman School website.
- K. Any media requests and contacts will be handled by the Head of School and/or the Director of SSO. Gilman School Personnel, except for the Head of School and the Director of SSO, are not authorized to make statements to, or discuss cases with, the media.