



# NEW HANOVER COUNTY SCHOOLS

Dr. Christopher R. Barnes  
*Interim Superintendent*

Jennifer Braswell-Geller  
*Interim Assistant Superintendent for Human Resources*

17 Oct 24

From: New Hanover County Schools (NHCS) Board of Education  
To: File

Subj: INTERNAL REPORT

Ref: (a) Settlement Agreement and Release of Claims of July 27,  
2023

Encl: (1) 2023-24 Say Something Training Roster 2023-2024  
(2) Program Profile: Shifting Boundaries (Classroom Curriculum and Schoolwide Intervention), National Institute of Justice, 21 Apr 24  
(3) NHCS Shifting Boundaries Hotspot Mapping Report of 2023-2024  
(4) 2023 Darkness to Light Roster  
(5) NHCS-Coastal Horizons Contract of 12 Feb 24  
(6) Title IX Staff Training  
(7) Title IX Base Presentation  
(8) Compilation of Title IX cases for 2021-2024  
(9) Title IX Training for 2023-2024  
(10) NHCS Policies and Procedures

1. The NHCS Board of Education made and entered a Settlement Agreement and Release of Claims, reference (a), on July 27, 2023, with John Does 1 to 14. Section 2.2 of reference (a) lists the non-monetary commitments for NHCS and John Does 1 to 14. One of the Board's commitments is to prepare an internal report on its efforts to "improve policies, procedures, and practices related to this case." Specifically, the internal report will include the following:

a. Detailed summaries of staff and student training provided related to sexual abuse and the recognition of such abuse.

b. Title IX training and compliance.

Subj: INTERNAL REPORT

c. Changes to policies or procedures within the school system to improve protections against sexual abuse within schools.

## 2. Summary of Staff and Student Training

a. NHCS has provided the following training related to sexual abuse and the recognition of sexual abuse to staff and students:

(1) Say Something. Say Something is an anonymous reporting system sponsored by Sandy Hook Promise linked to the NHCS website. Sandy Hook Promise is a national nonprofit organization founded by family members of students and adults killed at Sandy Hook Elementary School on December 14, 2012. Their mission is to educate and empower people, especially youths, to prevent violence in schools through an evidence-informed program that teaches students and adults to recognize, intervene, and get help for individuals who may be socially isolated or at risk of hurting themselves. Enclosure (1) lists each school's completion date and point of contact at each school for the See Something Training.

(2) Bringing in the Bystander. Bringing in the Bystander is a community responsibility approach that teaches bystanders how to safely intervene in situations where incidents of sexual assault and relationship violence may be occurring. Facilitated by the Coastal Horizons Center, a private, non-profit service delivery Corporation, NHCS included Bringing in the Bystander in its high schools' Health and Physical Education classes in School Year (SY) 2022-2023. NHCS replaced this training with its "Healthy Relationship" curriculum in 2024. See paragraph 2(a)(6) below.

(3) Shifting Boundaries. Shifting Boundaries is an evidence-informed intervention to raise awareness and prevent harassment and bullying. Facilitated by Coastal Horizons Center, NHCS included Shifting Boundaries in its 6th-grade Health and Physical Education classes. See enclosure (2). Coastal Horizons created a "Hotspot Mapping Report." The Report surveyed NHCS 6<sup>th</sup> graders during SY 2023-2024 about safety, bullying, and harassment at school and identified common trends. Enclosure (3).

(4) Darkness to Light. Darkness to Light is an organization committed to empowering adults to prevent child

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sexual abuse. Their training helps adults become aware of the scope of child abuse, take actionable steps toward preventing and responding to abuse, and create safer environments for children. Enclosure (4) lists each school's completion date and audience.

(5) Beginning of the Year Training. NHCS conducts this training through Vector, an online platform. The training reviews NHCS Policies that require mandatory reporting of suspected child abuse, staff-student relations, standards of professional conduct, staff responsibilities, and social media communications involving students.

(6) Healthy Relationships (Primary Prevention Programming). In February 2024, NHCS contracted Coastal Horizons to develop a "Healthy Relationships" curriculum for 9th-grade students for the Spring/Summer of 2024. This curriculum teaches critical social and life skills, such as internet safety, recognizing and reporting red flags in interpersonal relationships, and understanding consent, that assist students in gaining the ability to interact with others safely. Moreover, Coastal Horizons agreed to train NHCS staff to effectively deliver the curriculum to the students. NHCS staff members must attest that they have received the training. Enclosure (5)

(7) Family Life Curriculum. NHCS offers a family life unit in the Health and Physical Education (PE) courses for 5<sup>th</sup>-8<sup>th</sup> graders. The family life units cover Interpersonal Communication and Relationships (ICR) standards. These standards include sexual harassment, sexual abuse, sex trafficking, and abusive relationships, depending on the grade level. The topics are covered in MyLife and Stepping Stones, which parents can opt into for their children. In the 9<sup>th</sup> grade, the unit is part of the Health and PE course, and all students will receive the family life unit unless a parent has opted out of their child.

(8) Digital Citizenship. NHCS has partnered with a digital citizenship content provider, Neptune Navigate, to facilitate this training. Navigate provides comprehensive online digital citizenship modules that teach students about appropriate online behavior, including interacting with others on social networking websites and chat rooms and sending inappropriate images. All NHCS K-12 students are required to complete Neptune Navigate modules annually. NHCS has utilized Neptune Navigate since the 2022-23 school year, and school library media coordinators facilitate this training.

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(9) Duty to Report. NHCS has emphasized an employee's duty, requirement, and obligation to report suspected child abuse, harassment, and discrimination in its policies and training to its employees. NHCS has created Policy 1710 (Discrimination and Harassment Prohibited by Federal Law), 1725/4035/7236 (Title IX Sexual Harassment-Prohibited Conduct and Reporting Processes), 3610 (Counseling Program), and 4240/7312 (Child Abuse and Related Threats to Child Safety) making it mandatory for employees to report discrimination, harassment, maltreatment, and child abuse. See enclosure (10).

b. Title IX Training and Compliance

(1) The Title IX office conducts training for all NHCS employees. See enclosure (6). The training reviews Title IX definitions, notes reporting duties and methods, and explains NHCS policies on Title IX and other related policies. Enclosure (7) is a base Title IX presentation. The instructors may tailor this presentation to the intended audience.

(2) Enclosure (8) is a compilation of Title IX cases.

(3) NHCS created a full-time Title IX Coordinator and Title IX Investigator position in 2020. NHCS employs lawyers in these positions, although they are not required. A Title IX administrative assistant supports the Coordinator and the Investigator.

(4) Enclosure (9) lists the training that the Title IX staff has received.

c. Policies and Procedures

(1) Enclosure (10) lists the policies and procedures within the school system that improve protections against sexual abuse within schools.

(2) Say Something. See paragraph 2(a)(1) above.

(3) Ethix 360. Initiated in December 2019, Ethix 360 is an internet-based anonymous reporting system hosted by Star Compliance, an independent third party. Reporters can

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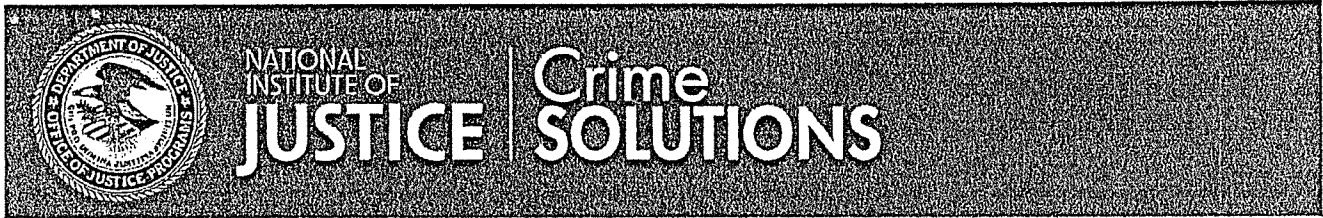
anonymously report bullying, sexual harassment, or any other concerns.

A handwritten signature in black ink, appearing to read 'JBG', with a large, sweeping flourish extending from the end of the signature.

Jennifer Braswell-Geller

## 2023-2024 Say Something Training Roster

School	SS-ARS Team Lead	Date Completed
Williston Middle School	Kristen Guthrie	October 2, 2023
Trask Middle School	Elizabeth Scharf	September 25, 2023
Roland Grise Middle School	Lauren Nalepa	October 13, 2023
Noble Middle School	Anita Brown	October 5, 2023
Myrtle Grove Middle School	Katherine Akinli	September 27, 2023
Gregory International School	Whitney McCoy	September 22, 2023
Holly Shelter Middle School	Melissa Wilson	September 22, 2023
Lake Forest Academy	Michelle Graham	October 5, 2023
JC ROE	Johnny Manning	October 10, 2023
Mosley PLC	Diane Whitford	September 21, 2023
Laney High School	Adrienne Vaughan	August 30, 2023
Isaac Bear	Molly Supcoe	January 10, 2024
Wilmington Early College		
New Hanover High School	Paul Haas	April 16, 2024
Ashley High School	Amy Hand	August 27-Sep 9, 2024
Hoggard High School		
Murray Middle School	Deanna Leake	February 14, 2024
SEATech	Heather Appleton	October 20, 2023



[Home](#)

## Program Profile: Shifting Boundaries (Classroom Curriculum and Schoolwide Intervention)

This dual intervention aims to reduce peer violence and sexual harassment in middle schoolers by emphasizing consequences and increasing surveillance of unsafe areas.

**Evidence Rating:** Promising | One study

**Date:** This profile was updated on April 21, 2021

### Program Summary

This dual intervention aims to reduce peer violence and sexual harassment in middle schoolers by emphasizing consequences and increasing surveillance of unsafe areas. The program is rated Promising. The intervention group had statistically significant reductions in sexual victimization and in violence victimization and perpetration compared with those in the control group. There were no statistically significant effects on sexual harassment perpetration, or knowledge, attitudes, or intentions.

A Promising rating implies that implementing the program may result in the intended outcome(s).

This program's rating is based on evidence that includes at least one high-quality randomized controlled trial.

### Program Description

## Evaluation Outcomes

## Evaluation Methodology

## Cost

## Implementation Information

## Evidence-Base (Studies Reviewed)

## Additional References

## Related Practices

**Date Modified:** April 21, 2021

*In 2012, Shifting Boundaries received a final program rating of Promising, based on the review of Taylor and colleagues (2011) that focused on numerous outcomes across all four comparison groups. In March 2021, CrimeSolutions conducted a re-review of the same study, concentrating on the comparison between students who received both the classroom and schoolwide interventions of Shifting Boundaries and students in the control group who did not receive either intervention. The program maintained a final rating of Promising.*

**Date Created:** July 17, 2024

## Rating Process

[Learn how this and other practices are rated](#)

## Program Snapshot

**Age:** 10 - 15

**Gender:** Male, Female



**Race/Ethnicity:** White, Black, Hispanic, Asian/Pacific Islander, Other

**Geography:** Urban

**Setting (Delivery):** School

**Program Type:** Children Exposed to Violence, Classroom Curricula, Crime Prevention Through Environmental Design/Design Against Crime, School/Classroom Environment, Violence Prevention

**Targeted Population:** Children Exposed to Violence

**Current Program Status:** Active

**Program Developer:**

Bruce Taylor

Principal Research Scientist

National Opinion Research Center

4350 East-West Highway

Bethesda, MD 20814

United States

Phone: 301.634.9512

[Email](#)

**Program Developer:**

Nan D. Stein

Senior Research Scientist

Wellesley College

106 Central Street

Wellesley, MA 02841-8203

United States

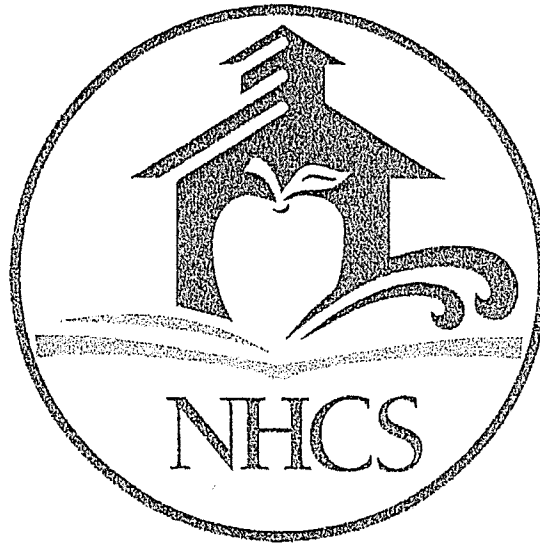
Phone: 781.283.2502

[Website](#)

[Email](#)



U.S. DEPARTMENT OF JUSTICE  
OFFICE OF JUSTICE PROGRAMS



SHIFTING BOUNDARIES  
HOTSPOT MAPPING REPORT

2023-2024 SCHOOL YEAR 6TH GRADE



Janie Dowda  
Coastal Horizons RCC  
RPE Coordinator  
[jdowda@coastalhorizons.org](mailto:jdowda@coastalhorizons.org)

Enclosure 3

# SY 23-24 HOTSPOT MAPPING

## BASED ON 541 MALE 6TH GRADE STUDENTS' MAPS:

**Trask - Areas of Concern**  
Recess / Outside Areas  
Main Hallway & 8th Grade Hall  
On the Bus  
Locker Rooms  
Bathrooms

**Murray - Areas of Concern**  
7th & 8th Grade Classrooms  
7th & 8th Grade Halls  
Car Line / Parking Lot  
Bathrooms

**Noble - No Feedback Here**

**Holly Shelter - Areas of Concern**  
7th & 8th Grade Classrooms  
Main Hallway, 7th & 8th Grade Halls  
Recess / Outside Areas  
Bus Lot & Car Line / Parking Lot  
On the Bus  
Walking to School  
Bathrooms

**Williston - Areas of Concern**  
Walking to School  
Bathrooms

**Myrtle Grove - Areas of Concern**  
Main Hallway & 8th Grade Hall  
Gym and Locker Rooms  
Cafeteria  
Recess / Outside Areas  
Bus Lot & On the Bus  
Car Line / Parking Lot  
Bathrooms

**Roland Grise - Areas of Concern**  
7th & 8th Grade Classrooms  
Main Hallway, 7th & 8th Grade Halls  
Recess / Outside Areas  
Bus Lot & Car Line / Parking Lot  
On the Bus  
Bathrooms

## MORE THAN 70% OF MALES IDENTIFIED BELOW AS SAFE AREAS IN THEIR SCHOOL:

Front Office	Gym	Cafeteria
6th Grade Classrooms	Media Center	Electives
6th Grade Hallway		

## AREAS OF CONCERN

### MORE THAN 30% OF MALE STUDENTS IDENTIFIED AS SOMEWHAT SAFE / UNSAFE

- All middle schools mentioned bathrooms.
- Majority mentioned on the bus, car line, parking lot, recess, outside areas, and main hallway as unsafe.
- Multiple schools mentioned 7th/8th grade classrooms and 7th/8th grade hallways as areas of concern.

## COMMON TRENDS FOR MALE STUDENTS

- Common types of bullying and harassment occurring in these areas were fights, pushing, yelling, name calling, and bullying/intimidation occurring in bathrooms, hallways, overcrowded areas, and around 7th/8th graders.
- Most 6th grade male students expressed areas of concerns being crowded and fighting. Students also mentioned feeling uncomfortable in these areas because they were unfamiliar with the students or school, and uncertain of what could happen.
- 50% said yes physical size can differentiate the comfort and safety of an area. Collectively male students expressed concerns on size shaming, higher risk for pushing and bullying due to size, lack of confidence, and being self-conscious of your size.
- 42% said yes gender can differentiate the comfort and safety of an area. Collectively, male responses include genders are treated differently, such as "girls are weaker/more vulnerable", and bathrooms and locker rooms may be uncomfortable depending on gender.
- Male students mentioned some ways to address bullying/harassment include more staff monitoring hallways during transition times, increase staff in the very crowded areas, more awareness of students' bullying behaviors, add more staff presence at the bus lot and on the bus, and monitor bathroom areas. They mentioned for staff and teachers to talk to students more about bullying, reporting, and what the school does to prevent and address these issues. And students should tell trusted adults and report these concerns.

# SY 23-24 HOTSPOT MAPPING

## BASED ON 494 FEMALE 6TH GRADE STUDENTS' MAPS:

### Trask - Areas of Concern

6th Grade Classrooms  
Main Hallway & 6th Grade Hall  
Gym & Recess / Outside Areas  
Bus Lot & On the Bus  
Bathrooms

### Murray - Areas of Concern

Front Office & Main Hallway  
7th Grade & 8th Grade Classrooms  
6th, 7th, & 8th Grade Halls  
Cafeteria  
Recess / Outside Areas  
Bus Lot & Car Line / Parking Lot  
Walking to School  
Bathrooms

### Noble - No Feedback Here

### Holly Shelter - Areas of Concern

7th & 8th Grade Classrooms  
Main Hallway, 6th, 7th & 8th Grade Halls  
Cafeteria  
Recess / Outside Areas  
Bus Lot & On the Bus  
Car Line / Parking Lot  
Walking to School  
Athletics / Sports & Locker Rooms  
Bathrooms

### Williston - Areas of Concern

6th, 7th, & 8th Grade Classrooms  
Main Hallway, 6th, 7th, & 8th Halls  
Auditorium / Music  
Cafeteria / Recess / Outside Areas  
Bus Lot, Car Line / Parking Lot  
Walking to School / Bathrooms

### Myrtle Grove - Areas of Concern

Main Hallway & 8th Grade Hallway  
Gym  
Locker Rooms  
Cafeteria  
Recess / Outside Areas  
Bus Lot & On the Bus  
Car Line / Parking Lot  
Bathrooms

### Roland Grise - Areas of Concern

7th & 8th Grade Classrooms  
6th, 7th, & 8th Grade Halls  
Main Hallway  
Cafeteria & Recess / Outside Areas  
Bus Lot & Car Line / Parking Lot  
Walking to School  
Bathrooms

## MORE THAN 70% OF FEMALES IDENTIFIED BELOW AS SAFE AREAS IN THEIR SCHOOL:

Front Office      Gym      Electives  
6th Grade Classrooms      Media Center

## AREAS OF CONCERN

### MORE THAN 30% OF FEMALE STUDENTS IDENTIFIED AS SOMEWHAT SAFE / UNSAFE

- All schools mentioned bathrooms, bus lot, recess/outside areas, main hallway, and 6th grade hallway.
- Majority mentioned walking to school, car line/parking lot, and cafeteria as unsafe.
- Multiple schools also mentioned 7th/8th grade classrooms and 7th/8th grade hallways as areas of concern.

## COMMON TRENDS FOR FEMALE STUDENTS

- Common types of bullying and harassment occurring in these areas were fights, pushing, yelling, name calling, vaping, gossiping, and the majority occurring in the bathrooms, hallways, crowded spaces, and areas that lack of adult supervision. Mentions of being overwhelmed, stressed, and uncertain in these areas of concern.
- Most 6th grade female students expressed areas of concerns being very crowded, loud, people being inappropriate, and/or lack of staff supervision. Students also expressed feeling uncomfortable and scared in these areas because they have seen bullying or they feel bullying can easily happen there.
- 45% said yes physical size can differentiate the comfort and safety of an area. Female students expressed concerns on body shaming, lack of confidence, low self-esteem, and physical size determines if bullied or not.
- 46% said yes gender can differentiate the comfort and safety of an area. Collectively, female responses mentioned genders being treated differently, such as "boys generally feel safer, more respected, and stronger", and bathrooms and locker rooms may be uncomfortable depending on gender. Female students also commented girls as the weaker, more vulnerable, more at risk, and feel safer and more comfortable with the same gender.
- Female students mentioned some ways to address bullying/harassment include more staff monitoring hallways and bathrooms especially during crowded times, fix the bathroom stall locks that are broken, staff stand in the unsafe areas, and check in on students when they are feeling overwhelmed and stressed. Talk to students more about the supportive measures in the school. And create a more encouraging, calm, and supportive school environment that students can feel safe and seen.

# SY 23-24 HOTSPOT MAPPING

**BASED ON 68 STUDENT RESPONSES:  
64 LEFT BLANK / PREFER NOT TO SAY + 4 NONBINARY**

## **Trask - Areas of Concern**

Main Hallway  
6th Grade Hallway  
Cafeteria  
Recess / Outside Areas  
Bus Lot

## **Murray - Areas of Concern**

8th Grade Classrooms  
Main Hallway  
6th, 7th, & 8th Grade Hallways  
Cafeteria  
Bus Lot & Car Line / Parking Lot  
Walking to School  
On the Bus  
Bathrooms

**Noble - No Feedback Here**

## **Holly Shelter - Areas of Concern**

6th & 7th Grade Classrooms  
Main Hallway  
6th, 7th, & 8th Grade Hallways  
Recess / Outside Areas  
Bus Lot & Car Line / Parking Lot  
Walking to School & On the Bus  
Electives  
Afterschool  
Bathrooms  
Locker Rooms

**Williston - No Feedback Here**

**Myrtle Grove - No Feedback Here**

## **Roland Grise - Areas of Concern**

8th Grade Classrooms  
Main Hallway  
8th Grade Hallway  
Recess / Outside Areas  
Bus Lot  
Car Line / Parking Lot  
On the Bus  
Bathrooms

**MORE THAN 70% OF THESE STUDENTS IDENTIFIED BELOW AS SAFE AREAS IN THEIR SCHOOL:**

Front Office                      Gym                      Cafeteria  
6th Grade Classrooms           Media Center

## **AREAS OF CONCERN**

**MORE THAN 30% OF THESE STUDENTS RESPONSES IDENTIFIED AS SOMEWHAT SAFE / UNSAFE**

- Majority mentioned main hallways, bathrooms, recess, outside areas, bus lot, car line, and parking lot.
- Few of the schools mentioned on the walking to school and on the bus.
- Multiple schools also mentioned specific grade hallways and 8th grade classrooms as unsafe.

## **COMMON TRENDS:**

- Common types of bullying and harassment occurring in these areas were fights, arguing, mean comments, name calling, shoving, and bullying. More commonly occurring in bathrooms, hallways, overcrowded areas, and where teachers/staff are not able to closely monitor.
- Students expressed areas of concern feeling uncomfortable, nervous, and unsafe because they are uncertain what could happen, generally a lot of people there or mean people, and feeling alone.
- 32% said yes physical size can differentiate the comfort and safety of an area. Concerns include intimidation and bullying because of smaller or larger physical stature and body shaming.
- 40% said yes gender can differentiate the comfort and safety of an area. Responses include certain genders feel more safe with their gender, aware of your safety helps with feeling comfortable and safe, lack of inclusivity.
- Students mentioned some ways to address bullying/harassment include additional teachers and staff monitoring the areas of concern like hallways, bathrooms, outside areas. For staff and teachers to talk to students more about the bullying and remind students that they are trusted and safe adults they can talk to. Also for both students and staff to interrupt the bullying behaviors and stop the bullying.

# SY 23-24 HOTSPOT MAPPING

## 6TH GRADE STUDENT FEEDBACK REPORT 2023-2024

### COMMON TRENDS FOR 6TH GRADE ACROSS PARTICIPATING MIDDLE SCHOOLS

Most common words from 1,022 student responses to the question:

**WHAT IS HAPPENING IN THE YELLOW AND RED AREAS THAT MAKE YOU FEEL UNSAFE?**

feel uncomfortable 6th grade hallway something main hallway school 8th grade open much loud  
alone feel weird either scare cafeteria crowded jumped make feel safe nervous stall  
bigger grades lot people things 8th graders walking home red anything happen  
unsafe parking lot kids 7th sometimes gym dont mean bullying might  
lot time feel unsafe scary scared 8th fights bad  
walking school feel comfortable feel front office  
people 8th grade hallway older kids someone older kind  
bathrooms shoving locker room boys feel safe taller  
yellow one know places happen yelling going something happen bus  
many people areas girls locker room pushing really walking running hallways doors  
recess look yellow areas judged around start in many uncomfortable nothing  
make feel unsafe car line make people anything lock older student well make feel uncomfortable

- The most common concerns of students when asked about what was happening in the areas they marked as being somewhat safe or unsafe include **bullying, fighting, hitting, weird feelings, crowded, uncertainty of what could happen, lack of comfortability, limited supervision, inappropriate language, and loud at times.**
- Also, noted that students specifically mentioned nervous around windows and possibility of school shootings, being uncomfortable in bathroom due to stalls missing locks, dirty bathroom areas, and anxious thoughts about being kidnapped in outside spaces as well as crowded areas were overwhelming and stressful.
- Overall, students felt the best ways to address their concerns in these areas were to **increase staff and teacher monitoring in hallways, outside classroom doors, bathrooms, and crowded areas. More supervision during transition times. Emphasis on talking with students about bullying behaviors, how to report, student support services, and trusted adults. As well as more conversations throughout the school year on respect and kindness towards each other, inclusion, and how the school creates safe and supportive environment for students.**

*Individual School Reports Available upon Request*

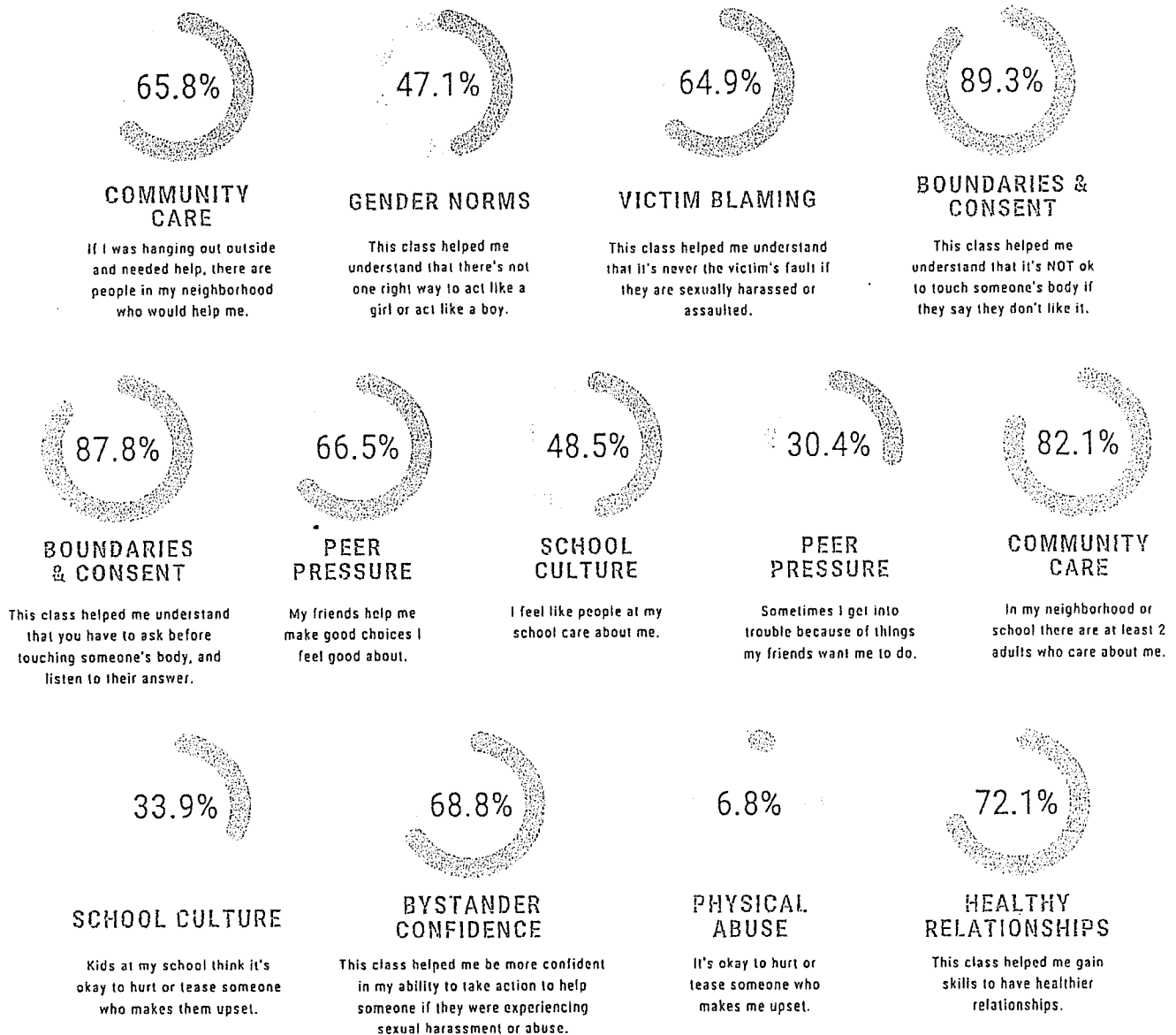
# SB POST ASSESSMENT

## 6TH GRADE STUDENT FEEDBACK REPORT 2023-2024

### PARTICIPATION

Of the 1,033 students that completed the SB Post Assessment for the 2023-2024 SY:

### STUDENTS AGREE / STRONGLY AGREE WITH THE FOLLOWING CONCEPTS AND STATEMENTS:



Special Thanks to NHCS Health/PE Teachers, Student Support Services, Family Life Educators, Title IX Division, Middle Schools Administration, and NHCS Board of Education.



# SY 23-24 HOTSPOT MAPPING

## 6TH GRADE STUDENT FEEDBACK REPORT 2023-2024

### SUGGESTED IMPROVEMENTS FOR SAFER, SUPPORTIVE SCHOOL ENVIRONMENTS

- **Bathrooms improvement** – Toilet paper, paper towel, and feminine product supplies restocked consecutively. Additional staff monitoring and bathroom checks throughout the day and school year. Monitor inappropriate messaging in bathrooms. If bathroom stall doors have a gap in between, consider adding barrier to provide privacy while in the stalls. Additional lighting in dark areas of bathrooms and secure the bathroom locks are not broken. Add safety checks in bathrooms throughout the school day. Talk to students about bathroom safety and concerns throughout school year.
- **Hallway Monitoring** – Additional staff in hallways during class transitions and stand near classroom doors as extra support when halls are overcrowded or busy. Additional lighting in dark areas of hallways. More transition times with less students in the hallways at once. Students requested to talk more about the monitoring and the issues of bullying and harassment. They want to be more aware of how the school is addressing their concerns. Student voice is important!
- **Unfamiliarity** – Focus on building the students' confidence in all areas of the school (ex: school tours, supportive poster campaign). Work with older grade students to grow rapport with 6th grade. Reiterate to students throughout the school year, that teachers and staff are there to help and support all students through conversations, reporting, and guidance. Find opportunities for students to work and create student groups to bring familiarity and improve comfort throughout the school day. Consider student leaders and/or student ambassador groups in grades to build rapport between grade levels. Provide fidgets and stress relief materials during class times.
- **Body Shaming Talk** – Host discussions with all grades about what body shaming can look like and what it can do for the students' confidence level. Reiterate body shaming is a form of bullying and harassment. Check in with students throughout the school year on what issues may be concerning around body shaming and verbal, social, and cyber bullying. Discuss and remind students of the school reporting systems, *Ethix360* and *See Something, Say Something* app.
- August is *Bystander Awareness Month*, which reminds us that bystanders have a pivotal role in shaping their environment. Students and staff together can improve the safety of the school and empower students to advocate for themselves and peers.
- October is *Bullying Prevention Month*, visit <https://www.pacer.org/bullying/nbpm/> for details on planning the month and showing support for students. *Unity Day* is Wednesday, October 16th. NHCS district did an awesome job at promoting and raising awareness for BPM SY 2023-24!
- *Start with Hello Week* (September 16-20) and *See Something, Say Something Week* (March 2025) are two dedicated weeks to help show support for students throughout the school year. <https://www.sandyhookpromise.org/our-programs/program-overview/>

## Darkness to Light Training

Darkness to Light	Date	Location	Attendees	Description
Darkness to Light	June 12, 2023	CRECC	CRECC	Staff training
Darkness to Light	June 13, 2023	Pine Valley ES	PVES Staff	Staff Training
Darkness to Light	July 11, 2023	Coddington ES	CES Staff	Staff Training
Darkness to Light	July 28, 2023	Snipes ES	Snipes Staff	Staff Training
Darkness to Light	July 31, 2024	Freeman ES	Freeman Staff	Staff Training
Darkness to Light	August 17, 2023	Wrightsville Beach ES	Wrightsville Staff	Staff Training
Darkness to Light	August 17, 2023	Masonboro ES	Masonboro Staff	Staff Training
Darkness to Light	August 18, 2023	Bellamy ES	Bellamy Staff	Staff Training
Darkness to Light	August 18, 2023	Bradley Creek ES	Bradley Creek Staff	Staff Training
Darkness to Light	August 18, 2023	Blair ES	Blair Staff	Staff Training
Darkness to Light	August 18, 2023	Murrayville ES	Murrayville Staff	Staff Training
Darkness to Light	August 18, 2023	Mary C. Williams ES	Williams Staff	Staff Training
Darkness to Light	August 18, 2023	Forest Hills ES	Forest Hills Staff	Staff Training
Darkness to Light	August 21, 2023	Wrightsboro ES	Wrightsboro Staff	Staff Training

Darkness to Light	August 21, 2023	Porters Neck ES	Porters Neck Staff	Staff Training
Darkness to Light	August 22, 2023	Sunset Park ES	Sunset Park Staff	Staff Training
Darkness to Light	August 22, 2023	Carolina Beach ES	Carolina Beach Staff	Staff Training
Darkness to Light	August 22, 2023	Winter Park ES	Winter Park Staff	Staff Training
Darkness to Light	August 22, 2023	Anderson ES	Anderson Staff	Staff Training
Darkness to Light	August 24, 2023	Johnson Pre-K	Johnson Staff	Staff Training
Darkness to Light	August 25, 2023	College Park ES	College Park Staff	Staff Training
Darkness to Light	August 25, 2023	Holly Tree ES	Holly Tree Staff	Staff Training
Darkness to Light	August 25, 2023	Alderman ES	Alderman Staff	Staff Training
Darkness to Light	August 25, 2023	Ogden ES	Ogden Staff	Staff Training
Darkness to Light	August 26, 2023	Castle Hayne ES	Castle Hayne Staff	Staff Training
Darkness to Light	August 28, 2023	Make Up Session	Staff from Snipes, AHS, Castle Hayne, Eaton, Central, and Howe Pre-k	Staff Training
Darkness to Light	August 30, 2023	Curriculum and Instruction	Staff from C&I	Staff Training
Darkness to Light	September 20, 2023	PCU	Staff from PCU	Staff Training

Darkness to Light	November 1, 2023	Eaton ES Make-up	Staff from Eaton	Staff Training
Darkness to Light	November 21, 2023	Sunset Park Make Up	Staff from Sunset Park	Staff Training

# Budget Contract Control Sheet

New Hanover County Schools, 6410 Carolina Beach Road, Wilmington, NC 28412

## Contract Information

SCHOOL/DEPARTMENT Student Support Services (710)  
 Budget Manager Lisa Brenner  
 PREPARED BY Tabitha Adams  
 PROJECT NAME Primary Prevention Programming  
 VENDOR NAME Coastal Horizons  
 VENDOR NUMBER 156  
 ADDRESS 615 Shipyard Blvd  
 CITY, STATE, ZIP Wilmington, NC 28412

Contract Date 2/12/24  
 Contract Term Dates: From 2/12/24  
 To 6/30/24  
 Original Contract Amount \$ 30,000.00  
 Previous Change Order(s) Amount                       
 Change Order Amount                       
 Total Contract Amount \$ 30,000.00  
 % Change in Contract 0%

Indicate Contract version in boxes below with an X, which also confirms applicable insurance has been verified.

- ☒ Version 1 No Student Contact - Software Contract  
☐ Version 2 NHCS Staff will supervise student at all times  
☐ Version 3 - Contact with Students  
☐ Version 4 - Charter Bus Contract  
☐ Non-Standard Contract - Required approval by Board Attorney

List document numbers if applicable:

Vendor Contract/Quote #                     

NHCS Requisition # (Amendments)                     

NHCS PO # (Amendments)                     

Change Order # (Amendments)                     

Munis Budget Code #

20.0864.58500.53110.00000  
000.00.710.0.

Distribution Amount

100%  
30,000.00

Notes:

## ROUTING FOR APPROVAL

APPROVAL SIGNATURE

DATE

Budget Manager

Lisa Brenner

2.12.24

Board Attorney (for Non-Standard Contracts)

Chief Financial Officer (CFO) Pre-audit

Ashley Sutton

2/20/24

For contracts \$100,000 or above

Assistant Superintendent

Approved by Superintendent

For contracts \$300,000 or above

Board Approval Date

Signature of Board Chair

## MUNIS Contract Information:

Requisition #

Processed By

Date

Purchase Order #

Enclosure 5

**NEW HANOVER COUNTY SCHOOLS BOARD OF EDUCATION**  
**CONTRACT FOR** Contracted **SERVICES**

This contract for Contracted services is made and will begin on 12 day of February 2024, between the New Hanover County Schools Board of Education (NHCS), 6410 Carolina Beach Rd., Wilmington, NC 28412 and Coastal Horizons (the "Vendor"), 615 Shipyard Blvd, Wilmington, NC 28412 (VENDOR'S ADDRESS).

For and in consideration of the mutual promises set forth in the Contract the parties do mutually agree as follows:

1. 1.1 Obligations of Vendor. Vendor hereby agrees to provide services to NHCS as follows:

Research and Curriculum Development, Program Facilitation Supplies, Technical Assistance, Train the Trainer Delivery, and Program Support.

(OPTION 1 - INCLUDE A DESCRIPTION OF DETAILED SERVICES, OR OPTION 2 - ATTACH "EXHIBIT A" WITH SCOPE OF SERVICES, OR OPTION 3 - BID AWARD NUMBER; AS APPLICABLE) Work will be completed in a timely manner acceptable to NHCS in full compliance with the terms and conditions of this Contract, including any documents incorporated by reference.

1.2. Qualifications of Vendor. \_\_\_\_\_ (THIS IS OPTIONAL)

Vendor warrants that all agents or employees of Vendor who will provide services under this Contract will be fully qualified, possess any requisite licenses, and otherwise be legally entitled to perform the services provided, and shall exercise the skill and care customarily exercised by duly licensed and qualified Vendors of the same or similar services.

1.3. Records Maintenance. Vendor shall maintain written documentation of any service provided, including any required documentation meeting the requirements of applicable federal, state and local laws and regulations.

2. Obligations of NHCS.

2.1. NHCS hereby agrees to compensate Vendor at a rate or in the amount of \$ 30,000.00

(INSERT RELEVANT TIME PERIOD OR OTHER MEASURE FOR CALCULATING PAYMENTS—E.G., HOUR, DAY, MILE, SQUARE FOOT, ETC.) for services rendered, with total payments not to exceed \$ 30,000.00 (INSERT NOT-TO-EXCEED AMOUNT). With the New Hanover County Schools written consent, payments may be made in monthly installments for work performed and accepted during the previous month.

2.2. In the event of inclement weather, fire, power failure, or other similar occurrence, which may necessitate the cancellation of the delivery of the service(s), and an alternate date cannot be agreed upon, NHCS will be under no obligation to compensate Vendor for services not rendered.

2.3. N/A

(SPECIFY ANY ADDITIONAL OBLIGATIONS OF NHCS, INCLUDING REIMBURSEMENT OF EXPENSES. DELETE IF N/A)

3. Term. The services described in the Contract will be provided from February 12, 2024 through June 30, 2024 unless sooner terminated as herein provided.

4. Compensation. NHCS hereby agrees to compensate Vendor in the amount of \$ 30,000.00 once all services have been rendered in accordance with the terms of this Contract. Vendor shall provide NHCS with invoice(s) referencing the contract number, itemized by service provided the number of hours worked and by whom, the date(s) that services were provided, and the amount owed, along with any supporting documentation that may be requested in advance by NHCS. NHCS shall process payments to Vendor within forty-five (45) days of submission of such invoice(s). In the event of inclement weather, fire, power failure, or other similar occurrence, which may necessitate the cancellation of the delivery of the service(s), and an alternate date cannot be agreed upon, NHCS will be under no obligation to compensate Vendor for services not rendered.
5. Termination for Convenience. NHCS may terminate this Contract at any time at its complete discretion upon twenty (20) calendar days' notice in writing from NHCS to Vendor prior to the date of termination. In addition, all finished or unfinished documents and other materials produced by Vendor pursuant to this Contract shall, at the request of NHCS be turned over to it and become its property. If the Contract is terminated by NHCS in accordance with this section, NHCS will pay Vendor at the rate set out in Section 2.1 for all services performed as of the date of termination.
6. Termination for Default. At any time, NHCS may terminate this Contract immediately and without prior notice if Vendor is unable to meet goals and timetables or if NHCS is dissatisfied with the quality of services provided.
7. Terms and Methods of Payment. Vendor shall submit to NHCS monthly invoices itemized by service provided, the number of hours worked and by whom, the date(s) that services were provided, and the amount owed, along with any supporting documentation that may be requested in advance by NHCS. Such invoices shall be submitted within thirty (30) days of the rendering of services. NHCS shall process payments to Vendor within forty-five (45) days of submission of such invoices. Invoices should be sent to Accounts Payable at [accountspayable@nhcs.net](mailto:accountspayable@nhcs.net) located 6410 Carolina Beach Road, Wilmington NC 28412, for review and approval.
8. Contract Funding. It is understood and agreed between Vendor and NHCS that NHCS's payment obligation under this Contract is contingent upon the availability of appropriated funds from which payment for Contract purposes can be made.
9. Taxes. Vendor shall pay all federal, state, and FICA taxes for all employees participating in the provision of services under this Contract.
10. Monitoring & Auditing. Vendor shall cooperate with NHCS, or with any other person or agency as directed by NHCS, in monitoring, auditing, or investigating activities related to this Contract. Vendor shall permit NHCS to evaluate all activities conducted under this contract as dictated by NHCS. Vendor shall provide auditors retained by NHCS with access to any records and files related to the provision of services under this Contract. NHCS agrees that its auditors will maintain the confidentiality of any identified and actual trade secrets of Vendor accessed during an audit conducted under this Contract.
11. Confidentiality of Student Information. Vendor agrees that all student records or personally identifiable information contained in student records that may be obtained in the course of providing services to NHCS under this contract shall be subject to the confidentiality and disclosure provisions of applicable federal and state statutes and regulations as well as NHCS's policies. All student records shall be kept in a secure location preventing access by unauthorized individuals. Vendor will maintain an access log delineating date, time, agency, and identity of individual accessing student records who is not in the direct employ of Vendor. Vendor shall not forward to any person other than parent or NHCS any student record or personally identifiable information obtained from a student record (including, but not limited to, the student's identity) without the written consent of NHCS. Upon termination of this Contract, Vendor shall turn over to NHCS all student records or personally identifiable information about students obtained by Vendor while providing services under this Contract. Nothing in this Contract gives Vendor any right to access any

student records or personally identifiable information.

12. Lunsford Act. Vendor also acknowledges that G.S. § 14-208.18 prohibits anyone required to register as a sex offender under Article 27A of Chapter 14 of the General Statutes from knowingly being on the premises of any school. Vendor shall conduct or arrange to have conducted, at its own expense, sexual offender registry checks on each of its owners, employees, agents, subcontractors and independent contractors ("Contractual Personnel") who will engage in any service on or delivery of goods to NHCS property or at a NHCS sponsored event, except checks shall not be required for individuals who are solely delivering or picking up equipment, materials, or supplies at: (1) the administrative office or loading dock of a school; (2) non-school sites; (3) schools closed for renovation; or (4) school construction sites. The checks shall include at a minimum checks of the State Sex Offender and Public Protection Registration Program, the State Sexually Violent Predator Registration Program, and the National Sex Offender Registry ("the Registries"). For Vendor's convenience only, all of the required registry checks may be completed at no cost by accessing the United States Department of Justice Sex Offender Public Website at <http://www.nsopw.gov/>. Vendor shall provide certification on the Sexual Offender Registry Check Certification Form (Attachment A) that the registry checks were conducted on each of its Contractual Personnel providing services or delivering goods under this Contract prior to the commencement of such services or the delivery of such goods. Vendor shall conduct a current initial check of the registries. The sex offender registry checks shall be conducted within 30 days of Vendor's execution of the Contract and prior to performing any services on NHCS property. In addition, Vendor agrees to conduct the registry checks and provide a supplemental certification form before any additional Contractual Personnel are used to deliver goods or provide services pursuant to this Contract. Vendor further agrees to conduct annual registry checks of all Contractual Personnel and provide annual certifications at each anniversary date of this Contract. Vendor shall not assign any individual to deliver goods or provide services pursuant to this Contract if said individual appears on any of the listed registries. Vendor agrees that it will maintain all records and documents necessary to demonstrate that it has conducted a thorough check of the registries as to each Contractual Personnel, and agrees to provide such records and documents to NHCS upon request. Vendor specifically acknowledges that NHCS retains the right to audit these records to ensure compliance with this section at any time in NHCS's sole discretion. Failure to comply with the terms of this provision shall be deemed a material breach of the Contract.
13. Indemnification. Vendor shall indemnify and hold harmless NHCS and its agents and employees from and against all claims, actions, demands, costs, damages, losses, and/or expenses of any kind whatsoever proximately resulting from the omission or commission of any act, lawful or unlawful, by Vendor or its agents and/or employees, including but not limited to court costs and attorney's fees, incurred in connection with the defense of said matters. The parties agree that this indemnification clause is an "evidence of indebtedness" for purpose of N. C. Gen. Stat. § 6-21.2.
14. Relationship of Parties. Vendor shall be an independent contractor of NHCS, and nothing herein shall be construed as creating a partnership or joint venture; nor shall any employee of Vendor be construed as an employee, agent, or principal of NHCS.
15. Compliance with Applicable Laws. Vendor shall comply with all applicable laws and regulations in providing services under this Contract. In particular, Vendor shall not employ any individuals to provide services to NHCS who are not authorized by federal law to work in the United States. Vendor represents and warrants that it is aware of and in compliance with the Immigration Reform and Control Act and North Carolina law (Article 2 of Chapter 64 of the North Carolina General Statutes) requiring use of the E-Verify system for employers who employ twenty-five (25) or more employees and that it is and will remain in compliance with these laws at all times while providing services pursuant to this Contract. Vendor shall also ensure that any of its subcontractors (of any tier) will remain in compliance with these laws at all times while providing subcontracted services in connection with this Contract. Vendor is responsible for providing affordable health care coverage to all of its full-time employees providing services to NHCS. The definitions of "affordable coverage" and "full-time employee" are governed by the Affordable Care



Act and accompanying IRS and Treasury Department regulations.

16. Restricted Companies Lists. Vendor represents that as of the date of this Contract, Vendor is not included on the Final Divestment List created by the North Carolina State Treasurer pursuant to N.C. Gen. Stat. § 147-86.58. Vendor also represents that as of the date of this Contract, Vendor is not included on the list of restricted companies determined to be engaged in a boycott of Israel created by the North Carolina State Treasurer pursuant to N.C. Gen. Stat. § 147-86.81.
17. Anti-Nepotism. Vendor warrants that, to the best of its knowledge and in the exercise of due diligence, none of its corporate officers, directors, or trustees and none of its employees who will directly provide services under this Contract are immediate family members of any member of the New Hanover County Board of Education or of any principal or central office staff administrator employed by NHCS. For purposes of this provision, "immediate family" means spouse, parent, child, brother, sister, grandparent, or grandchild, and includes step, half, and in-law relationships. Should Vendor become aware of any family relationship covered by this provision or should such a family relationship arise at any time during the term of this Contract, Vendor shall immediately disclose the family relationship in writing to NHCS Superintendent. Unless formally waived by NHCS, the existence of a family relationship covered by this Contract is grounds for immediate termination by NHCS without further financial liability to Vendor.
18. Applicable School Board of Education Policies. Vendor acknowledges that the New Hanover County Board of Education has adopted policies governing conduct on NHCS property and agrees to abide by any and all relevant Board policies while on NHCS property. The Vendor acknowledges that Board's policies are available on NHCS's website.
19. Assignment. Vendor shall not assign, subcontract, or otherwise transfer any interest in this contract without the prior written approval of NHCS.
20. Contract Modifications. This contract may be amended only by written amendments duly executed by and between NHCS and Vendor.
21. North Carolina Law. North Carolina law will govern the interpretation and construction of the Contract.
22. Order of Precedence. The Parties do hereby agree that in the event of conflict between the terms and conditions of this Contract and the terms and conditions in an agreement entered into between the parties at the same time as or prior to this Agreement, the terms and conditions of this Agreement shall prevail.
23. Entire Agreement. This Contract, including the purchase order, if any, used in connection herewith and any other document(s) expressly incorporated by reference as a part of this Contract, constitutes and expresses the entire agreement and understanding between the parties concerning its subject matter. This Contract supersedes all prior and contemporaneous discussions, promises, representations, agreements, and understandings relative to the subject matter of this contract. To the extent there may be any conflict between the four corners of this Contract and other documents incorporated by reference herein, the terms of this Contract will control.
24. Attached Exhibits: The following documents, if any, are attached as Exhibits to this Contract and incorporated by reference herein:  
Exhibit  
A: Scope of Work  
(INSERT NAME OF SCOPE OF SERVICES EXHIBIT)  

---

  
Exhibit B: \_\_\_\_\_  
(INSERT NAME OF ADDITIONAL EXHIBIT OR "N/A")
25. Severability. If any provision of this Contract shall be declared invalid or unenforceable, the remainder of the Contract shall continue in full force and effect.

26. Counterparts and Execution. This Contract may be executed in any number of counterparts, each of which will be deemed an original but all of which together will constitute one and the same instrument. The Parties agree that computer scanned and/or faxed signatures or copies of this Contract will have the same validity and force as an "original."
27. Authority to Enter Contract. The person(s) executing this Contract on behalf of Vendor have authority to do so as an official, binding act of Vendor.

Exhibit A: Scope of Work Contract with Coastal Horizons RCC- A

Amount \$30,000 Now through close of the fiscal year

Contract Appendix: NHCS Primary Prevention Programming Development Scope of Work

Coastal Horizons RCC

**1. Research and Curriculum Development:**

- Primary Prevention staff at Coastal Horizons RCC will conduct comprehensive research to gather information relevant to the development of a curriculum focused on boundaries, consent, recognizing and reporting, and red flags in interpersonal relationships for high school age students in New Hanover County Schools.
- The curriculum will align with the NC Essential Standards for Health and PE, specifically Interpersonal Communication and Relationship standards.
- The curriculum will be structured into modules and activities tailored for facilitators, with an emphasis on providing clear resources to address inquiries related to the curriculum content.

**2. Program Facilitation Supplies:**

- Coastal Horizons RCC will procure and provide necessary supplies required for the effective implementation of the curriculum within the participating schools.

**3. Technical Assistance:**

- Coastal Horizons RCC commits to offering ongoing technical assistance to support the schools in effectively utilizing the curriculum. This assistance will be readily available to address any challenges or queries that may arise during the implementation process.

**4. Train the Trainer Delivery:**

- Primary Prevention Staff will conduct comprehensive training sessions for designated staff facilitators, equipping them with the necessary skills and knowledge to effectively deliver the curriculum content.
- The training sessions will focus on empowering facilitators with the tools needed to engage students in discussions surrounding boundaries and consent.

**5. Program Support:**

- Coastal Horizons RCC will extend support to the schools throughout the duration of the contract, ensuring smooth implementation and addressing any issues or concerns that may emerge.
- This support will encompass ongoing communication, guidance, and collaboration between Coastal Horizons RCC and New Hanover County Schools.

By agreeing to this scope of work, both parties acknowledge their commitment to the successful development and implementation of the NHCS Primary Prevention Programming, aimed at fostering a safe and informed environment for high school students in New Hanover County Schools.

Attachment A

Sexual Offender Registry Check Certification Form

*PLEASE SUBMIT THIS FORM TO YOUR NHCS'S REPRESENTATIVE*

Project Name: \_\_\_\_\_ Contract: \_\_\_\_\_

Check the appropriate box to indicate the type of check:

☐ Initial ☐ Supplemental ☐ Annual

I, \_\_\_\_\_ (insert name), \_\_\_\_\_ (insert title) of

\_\_\_\_\_ (insert company name) hereby certify that I have performed all of the required sexual offender registry checks required under this Agreement for all Contractual Personnel (employees, agents, ownership personnel, or contractors ) who may be used to deliver goods or provide services under this Agreement, including the North Carolina Sex Offender and Public Protection Registration Program, the North Carolina Sexually Violent Predator Registration Program, and the National Sex Offender Registry (Note: all of the required registry checks may be completed at no cost by accessing the United States Department of Justice Sex Offender Public Website at <http://www.nsopw.gov/>). I further certify that none of the individuals listed below appears on any of the above-named registries and that I will not assign any individual to deliver goods or perform services under this Agreement if said individual appears on any of the sex offender registries. I agree to maintain all records and documents associated with these registry checks, and that I will provide such records and documents to NHCS upon request. I specifically acknowledge that NHCS retains the right to audit these records to ensure compliance with this section at any time in NHCS's sole discretion. I acknowledge that I am required to perform these checks and provide this certification form before any work is performed under the Agreement (initial check), any time additional Contractual Personnel may perform work under the Agreement (supplemental check), and at each anniversary date of the Agreement (annual check).

Contractual Personnel Names

Job Title

1. _____	_____
2. _____	_____
3. _____	_____
4. _____	_____
5. _____	_____

I attest that the forgoing information is true and accurate to the best of my knowledge.

\_\_\_\_\_ (print name)

\_\_\_\_\_ (signature / date)

# TRAINING RECEIVED BY TITLE IX OFFICE

NAME/DESCRIPTION OF TRAINING	DATE OF TRAINING	COURSE HOURS	LOCATION OF TRAINING	WHO ATTENDED THE TRAINING	NOTES
Radar Child Forensic Interview Model	Oct. 21-25, 2024	32 hours	Morganton, NC	Leah Bressler	RADAR Certification
First Call Initial Investigative Interview with Children	July 30-31, 2024	2 days	CFCC North Campus	Leah Bressler	First Call Certification
Southeast Education Alliance 2024 Spring Legal Update on the Interplay between Exceptional Children Discipline, Emergency Removals under Title IX, MDR Decisions under IDEA, Threat Assessment Team Decisions, and Alternative School and Program Placements	May 23, 2024	2.5 hours	Zoom	John Henry, Leah Bressler	Campbell & Shatley, PLLC
Title IX Investigator Foundations for K-12 Education	May 8, 2024	7 hours	Zoom	Leah Bressler	ATIXA – Certification

ATIXA 2024 Summer Certification Series for Title IX Coordinator Foundations for K-12	May 7, 2024	7 hours	Zoom	John Henry	ATIXA - Certification
ATIXA Seminar on New Title IX Regulations	April 24, 2024	1.5 hours	Zoom	John Henry, Leah Bressler	ATIXA
ICS K-12 Year-End Review Webinar: Title IX Compliance Learnings from 2023 and their application in 2024	Jan. 18, 2024	1 hour	Zoom	Leah Bressler	ATIXA
VCU Title IX Focus Group 4-515	Jan. 16, 2024	1 hour	Zoom	Leah Bressler	
NHCS Title IX Mandatory Reporter Training	Jan. 2, 2024	30 min.	Webinar	Leah Bressler	NHCS
Title IX and Gender Equality in Athletics	Jan. 2, 2024	51 min.	Webinar	Leah Bressler	NHCS/Vector
Title IX Compliance Overview	Jan. 2, 2024	45 min.	Webinar	Leah Bressler	NHCS/Vector
Title IX: An Introduction to the New Regulations	Dec. 29, 2023	1.15 hours	Webinar	Leah Bressler	Dept. of Education Office for Civil Rights
OCR Webinar: Title IX Regulations Addressing Sexual Harassment	Dec. 29, 2023	1 hour	Webinar	Leah Bressler	Dept. of Education Office for Civil Rights
Title IX and Civil Rights Webinar	Dec. 13, 2023	1.5 hours	Zoom	John Henry	Dan Schorr, LLC
Managing Intake, Jurisdiction, and Dismissals Workshop	Nov. 30, 2023	1 hour	Zoom	Leah Bressler	ATIXA – The Association of Title IX Administrators

Title IX Compliance for K-12 Athletics	Nov. 17, 2023	1 hour	Zoom	John Henry, Leah Bressler, Pat Kodetsky	ATIXA – The Association of Title IX Administrators
Investigating Misconduct in Collegiate Athletics	Nov. 15, 2023	1 hour	Zoom	John Henry	Dan Schorr, LLC
Virtual Certified Investigator Training Level 2 HYPO	Oct. 12, 2023	1 hour	NHCS PowerPoint Presentation	Leah Bressler	John Henry
Virtual Certified Title IX Investigator Training Level 2 HYPO	Oct. 12, 2023	1 hour	NHCS PowerPoint Presentation	Leah Bressler	John Henry
Beginning Teacher (BT) Training	Oct. 5, 2023	1 hour	NHCS PowerPoint Presentation	Leah Bressler	NHCS
Beginning Teacher (BT) Title IX Training Scenarios	Oct. 5, 2023	1 hour	NHCS PowerPoint Presentation	Leah Bressler	NHCS

# Human Resources Policies and Procedures





# NHCS Board Policy

## 7235: Title IX

### Nondiscrimination on the Basis of Sex

#### Key Points:

- School system does not discriminate on the basis of sex (includes gender identity).
- Title IX Coordinator ensures NHCS compliance with Title IX.
- NHCS established a grievance process to address Title IX issues.
- Dept of Education proposed new Title IX rules in June 2022. Anticipate changes to Title IX definitions and processes.

#### Policy Code: 1720/4030/7235 Title IX Nondiscrimination on the Basis of Sex

The school system does not discriminate on the basis of sex (including pregnancy, childbirth, sexual orientation, and gender identity) in its education programs or activities and is required by Title IX of the Education Amendments Act of 1972 and federal regulations to not discriminate in such a manner. This requirement extends to admission and employment. The board will not tolerate discrimination on the basis of sex, including any form of sexual harassment as that term is defined under Title IX, in any program or activity of the school system.

##### A. Inquiries About Title IX

The board has designated a Title IX coordinator to coordinate its efforts to comply with its responsibilities under Title IX and its implementing regulations. Inquiries about the application of Title IX and its implementing federal regulations may be referred to the Title IX coordinator and/or the Assistant Secretary for Civil Rights in the Office for Civil Rights at the U.S. Department of Education.

The contact information for the Title IX coordinator is as follows:

Office Address: 6410 Carolina Beach Rd, Wilmington, NC 28412  
Email Address: [titelx@nhcs.net](mailto:titelx@nhcs.net)  
Phone Number: (910) 254-4209

The contact information for the Office for Civil Rights with jurisdiction over North Carolina is as follows:

4000 Maryland Ave, SW  
Washington, DC 20262-1475  
Telephone: 202-453-6020 TDD: 800-877-8339  
FAX: 202-453-6021 Email: [OCR.DC@ed.gov](mailto:OCR.DC@ed.gov)

##### B. Resolution of Grievances

The board has established grievance procedures that provide for the prompt and equitable resolution of complaints alleging discrimination on the basis of sex (other than sexual harassment) in a program or activity of the school system occurring against a person in the United States. Students and parents or guardians may report such alleged discrimination through the process provided in policy 1740/4010, Student and Parent Grievance Procedure. Employees and applicants may use the process provided in policy 1750/7220, Grievance Procedure for Employees.

The board has adopted additional means for reporting sexual harassment specifically. Any person may report alleged sexual harassment in the education program or activities of the school system occurring against a person in the United States in accordance with policy 1725/4035/7236, Title IX Sexual Harassment - Prohibited Conduct and Reporting Process. Those who believe they have been sexually harassed may also file a formal complaint of sexual harassment in accordance with policy 1725/4036/7237, Title IX Sexual Harassment Grievance Process, to initiate a prompt and equitable resolution through a formal investigation and adjudication or through an informal resolution process. The board encourages students, employees, and applicants to first make a report of sexual harassment in accordance with policy 1725/4035/7236 before filing a formal complaint.

##### C. Retaliation Prohibited

# NHCS Board Policy

## 7236: Title IX

### Sexual Harassment: Prohibited Conduct

#### Key Points:

- Specifically, prohibits sexual harassment as defined by Title IX (assault, fondling, stalking, domestic violence, dating violence, quid pro quo, and Davis Standard (unwelcome conduct that is severe, pervasive, and objectionably offensive)).
- Duty to report **immediately**: Witness sexual harassment or have reliable information of sexual harassment.
- Interactive Process with students, parents, and school to determine supportive measures (schedule change, monitoring, security, counseling, etc).

#### Policy Code: 1725/4035/7236 Title IX Sexual Harassment -- Prohibited Conduct and Reporting Process

The board acknowledges the dignity and worth of all students and employees and desires to create a safe, orderly, caring, and inviting school environment to facilitate student learning and achievement. As provided in policy 1720/4030/7235, Title IX Nondiscrimination on the Basis of Sex, the board will not tolerate sexual harassment in the education program and activities of the school system. The board takes seriously all reports and formal complaints of sexual harassment.

This Title IX sexual harassment policy specifically prohibits sexual harassment as that term is defined under Title IX. It provides a process for students, employees, and others to report such sexual harassment for response by school officials. All incidents of conduct that could constitute sexual harassment under this policy are to be reported and treated in accordance with this policy, whether or not the incidents may also constitute violations of other board policies or standards of conduct.

Individuals who believe they have been subjected to sexual harassment prohibited by this policy or who have witnessed or have reliable information that another person has been subjected to sexual harassment prohibited by this policy should use the process provided in Section C of this policy to report such violations.

The board also provides a grievance process for those who believe they have been victims of sexual harassment that is designed to achieve prompt and equitable resolution of formal complaints of sexual harassment through a formal investigation and adjudication of the allegations in the complaint. The grievance process is provided in policy 1726/4035/7237, Title IX Sexual Harassment Grievance Process. Affected individuals are encouraged to report sexual harassment in accordance with the process provided in Section C of this policy before filing a formal complaint to initiate the grievance process.

#### A. Prohibited Behavior

Students, school system employees, volunteers, and visitors are expected to behave in a civil and respectful manner. The board expressly prohibits sexual harassment by students, employees, board members, volunteers, or visitors. "Visitors" includes parents and other family members and individuals from the community, as well as vendors, contractors, and other persons doing business with or performing services for the school system.

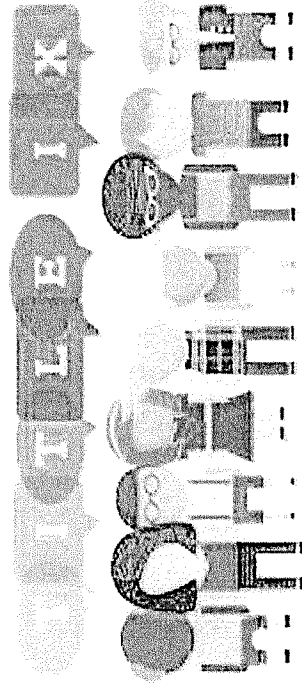
Sexual harassment prohibited under Title IX and by this policy is conduct on the basis of sex occurring in a school system education program or activity that satisfies one or more of the following:

1. an employee of the school system conducting the provision of an aid, benefit, or service of the school system on an individual's participation in an education-related activity;
2. unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the school system's education program or activities;
3. sexual assault including rape, statutory rape, fondling, and incest;
4. dating violence;
5. domestic violence or

# Title IX

"No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance."

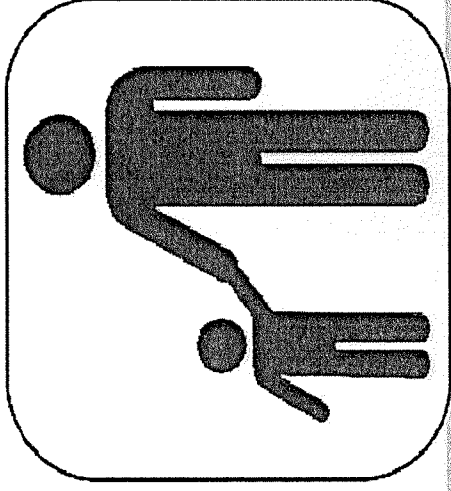
June 23, 1972





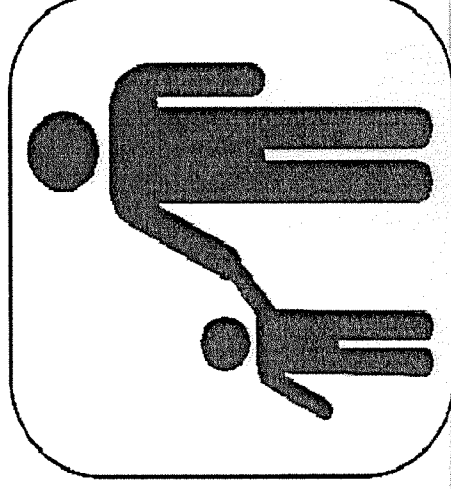
## *In Loco Parentis*

- "Acting or done in the place of a parent."
- ALL NHCS employees have a duty to keep students safe from sexual harassment.
- Duty = Reporting when there's actual knowledge of sexual harassment



## *In Loco Parentis - Actual Knowledge*

1. Direct Report
2. Secondary Report (3rd party report & rumors)
3. Direct Observation
  - "Within NHCS Programs & Activities"



# What is Sexual Harassment under Title IX?

- Quid Pro Quo - an employee of the Recipient conditioning the provision of an aid, benefit, or service of the Recipient on an individual's participation in unwelcome sexual conduct.
- Dating Violence - Violence committed by a person who is/has been in a social relationship of romantic/intimate nature with the victim.
- Stalking - Engaging in a course of conduct directed at a specific person that would cause a reasonable person to (i) fear for their safety or the safety of others or (ii) suffer substantial emotional distress.
- Sexual Assault - (Rape, Statutory Rape, Fondling, Incest)
- Davis Standard - (Catch all or involves speech) - unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the Recipient's education program or activities.

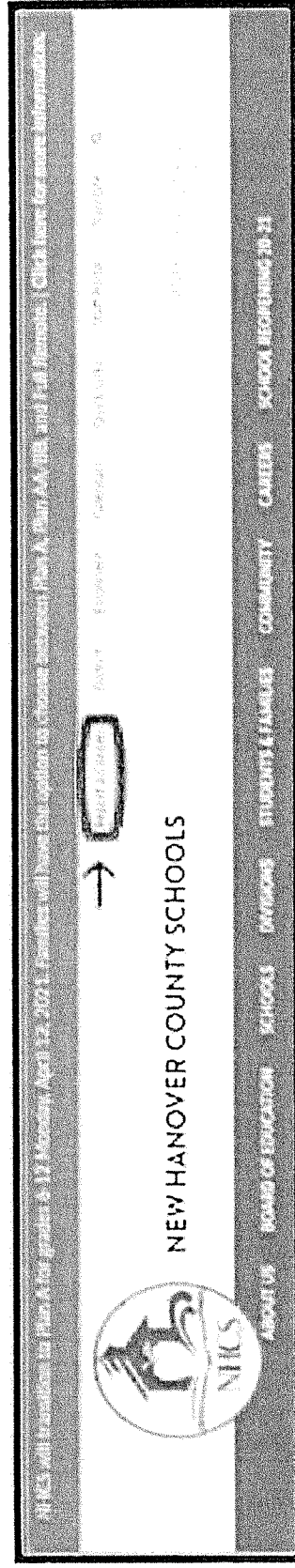
## Principal or Building Supervisor - Reporting

- “Immediately” report sexual harassment
  - By end of the day but for sure before 24 hours passes
- Best to report in writing
- Don’t forget about DSS and Law enforcement reporting requirements when applicable
  - child abuse/neglect
  - criminal act

# Ethix 360 - Reporting

STEP ONE: Go to [www.nhcs.net](http://www.nhcs.net) (NHCS homepage)

STEP TWO: Select the "report a concern" link at the top of the homepage





STEP THREE: Select "report a concern" on the Ethix360 landing page


## It's OK to Reach Out

At the University of North Carolina, we are committed to creating a safe and healthy campus environment for all. We encourage you to report any concerns you have about the safety and health of our campus community. Your report will be handled confidentially and we will take appropriate action to address the concern.


Report a concern

## Anonymous and Confidential 24/7


Report a concern



Submit a concern



Anonymous and Confidential 24/7



Report a concern

STEP FOUR: Check the box to confirm you understand Ethix360 is not for reporting emergencies

STEP FIVE: Create numeric pin

- The numeric pin can be any combination of numbers you choose

# NHCS Policies

Applicable NHCS Policies: 1720, 1725, 4329, 4040

- 1720 - Title IX Nondiscrimination on the Basis of Sex
- 1725 - Title IX Sexual Harassment — Prohibited Conduct and Reporting Process
- 4329 - Bullying and Harassing Behavior Prohibited
- 4040 - Staff-Student Relations

# NHCS Board Policy

## 7237: Title IX

### Sexual Harassment Grievance Process

#### Key Points:

- Establishes a complete, thorough, and fair grievance process for Title IX formal complaints.
- Lists steps of grievance process (formal complaint, investigation, review, adjudication and appeal).
- Dept of Education proposed new Title IX rules. Anticipate major changes to process.

#### Policy Code: 1720/4030/7237 Title IX Sexual Harassment Grievance Process

The process provided in this policy is designed for those who believe that they have been sexually harassed in violation of policy 1720/4030/7236, Title IX Sexual Harassment -- Prohibited Conduct and Reporting Process, and wish to file a formal complaint. School officials shall follow the grievance process established in this policy when responding to all formal complaints of sexual harassment.

The superintendent is responsible for notifying students and their parents or legal guardians, employees, and applicants for employment of this policy and ensuring that each principal or site supervisor provides a copy of this policy to these persons.

#### A. Definitions

All definitions in policy 1720/4030/7236, Title IX Sexual Harassment -- Prohibited Conduct and Reporting Process, are incorporated by reference and have the same meaning when used in this policy, including all references to "sexual harassment" in this policy.

The following additional definitions apply in this policy.

##### 1. Investigator

The investigator is the school official responsible for investigating and responding to a formal complaint.

##### 2. Decision Maker

The decision maker is the school official responsible for making a determination regarding responsibility in response to an investigation of sexual harassment triggered by a formal complaint.

##### 3. Investigative Report

The investigative report is a written account of the findings of the investigation conducted in response to a formal complaint.

##### 4. Remedies

Remedies are individualized measures provided to a complainant designed to restore or preserve the complainant's equal access to the education program and activities of the school system when a respondent is found responsible for sexual harassment.

Remedial measures available to a complainant following a determination of responsibility include counseling, mental health services referral, extensions of deadlines or other course related adjustments, modifications of work or class schedules, escort services, mutual or one-way restrictions on contact between the parties, changes in work locations, leaves of absence, increased security and monitoring, and other measures determined by school officials to be necessary to restore or preserve the complainant's equal access to the education program and activities, regardless of whether such measures impose a burden on the respondent or are punitive or disciplinary in nature.

##### 5. Disciplinary Sanctions

Disciplinary sanctions are consequences imposed on a respondent when the respondent is found responsible for sexual harassment.

# NHCS Board Policy

## 7270: School Safety

### Key Points:

- Students must be reasonably supervised during school hours, including during class, between classes, on the playground, and during recess or lunch periods; during authorized school field trips; and on school buses
- Reasonable precautions should be taken to protect the safety of students on school grounds and on buses before, during, and after school.
- All employees have a duty to be alert at all times to situations that may pose a threat to the safety.
- Staff members must report immediately to the principal any information regarding unusual or suspicious behavior or acts of violence, harassment, or bullying.

### Policy Code: 1510/4200/7270 School Safety

Safe schools are critical to creating a learning environment in which students can succeed. Staff and students share the responsibility for taking reasonable precautions and following established safety measures to create and maintain safe schools. The following safety measures must be implemented at each school.

#### A. Supervision of Students

Students must be reasonably supervised while in the care and custody of the school system. This supervision must occur throughout school hours, including during class, between classes, on the playground, and during recess or lunch periods; during authorized school field trips; and on school buses. Reasonable precautions should be taken to protect the safety of students on school grounds and on buses before, during, and after school.

Students who are subject to policy 4260, Student Sex Offenders, and are receiving educational services on school property must be supervised by school personnel at all times.

#### B. Supervision of Visitors

School administrators shall strictly enforce policies 5015, School Volunteers, and 5020, Visitors to the Schools.

#### C. Safety of School Buildings and Grounds

The board recognizes its duty to provide each of its employees with a work place free from recognized hazards that are causing or are likely to cause death or serious physical harm.

The superintendent and each building principal shall comply with all duties set out for their respective positions in G.S. 115C-289(d) and G.S. 115C-525 to minimize fire hazards. The principal is required to inspect school buildings, playgrounds, and equipment for health, fire, and safety hazards twice a month, and to notify the superintendent immediately of unsanitary conditions or repairs needed to meet safety standards.

Any employee who observes any potential hazards must notify the principal or the employee's supervisor immediately.

All warning systems must meet building and equipment codes required by law and must be properly maintained. When necessary, proper signs indicating potential hazards or recommended safety precautions must be posted.

#### D. Establishing Processes to Address Potential Safety Concerns and Emergencies

##### 1. Responding to Student Altercations and Other Threats to Safety

All school system employees have a duty to be alert at all times to situations that may pose a threat to the safety of students, employees, or visitors on school property, at school events, or in other situations in which the students are under the authority of school employees. Even an employee who does not have responsibility for supervising students is expected to make an immediate report to his or her supervisor or the building administrator if the employee observes or has reason to suspect that a situation poses a threat to safety and no administrator, teacher, or other supervisory employee is present and aware of the potential threat.

# NHCS Board Policy

## 7300: Staff Responsibilities

### Key Points:

- Employees shall be familiar with, support, comply with, and, when appropriate, enforce board policies, administrative procedures, school rules, and applicable laws.
- Employees shall be responsible for the integrity and consequences of their own actions.
- Duty to Report: Employees shall notify the assistant superintendent for human resources or their direct supervisor if they are arrested for, charged with, or convicted of a criminal offense no later than the next scheduled business day
- Upon judicial action in the matter, the employee must report the disposition and pertinent facts in writing to the assistant superintendent for human resources no later than the next business day following adjudication.

### Policy Code: 7300 Staff Responsibilities

For students to succeed, all school system employees must approach their responsibilities conscientiously, always remembering that the ultimate responsibility of the school system is to provide students with the opportunity to receive a sound basic education.

#### A. All School System Employees

##### 1. General Responsibilities

All school system employees shall:

- a. be familiar with, support, comply with, and, when appropriate, enforce board policies, administrative procedures, school rules, and applicable laws;
- b. attend to the safety and welfare of students, including the need to provide appropriate supervision of students;
- c. be responsible for the integrity and consequences of their own actions;
- d. demonstrate honesty, integrity, fairness, respect, and commitment to the truth through attitudes, behavior, and communications with others, while engaging in any activity concerning the school system;
- e. refrain from seeking or accepting personal gain which would influence, or appear to influence, the conduct of their official duties;
- f. address or appropriately direct any complaints concerning school employees, the school program, or school operations; and
- g. support and encourage good school-community relations in all interactions with students, parents, and members of the community.

##### 2. Duty to Report

Employees shall notify the assistant superintendent for human resources or their direct supervisor if they are arrested for, charged with, or convicted of a criminal offense (including entering a plea of guilty or *nolo contendere*) other than a minor traffic violation (i.e., speeding, parking, or a lesser violation). Notice must be in writing, must include all pertinent facts, and must be delivered to the assistant superintendent for human resources no later than the next scheduled business day following the arrest, charge, or conviction, unless the employee is hospitalized or incarcerated, in which case the employee must report the alleged violation within 24 hours after his or her release. Upon judicial action in the matter, the employee must report the disposition and pertinent facts in writing to the assistant superintendent for human resources no later than the next business day following adjudication.

In addition, any operator of a New Hanover County Schools' vehicle must immediately report to the board or designee any conviction that results in three or more points, and any conviction that could cause suspension or revocation of the driver license in any state. The board will notify the Department of Public Instruction when an instructor loses his or her privilege to drive in North Carolina or any other state. The superintendent or designee shall conduct annual checks of the driving records of all driver education instructors.

# NHCS Board Policy

## 7310: Staff-Student Relations

### Key Points:

- Relationships between staff and students must be based upon cooperation, mutual respect, and an understanding of the appropriate boundaries between adults and students inside and outside of the educational setting.
- All employees are prohibited from dating, courting, or entering into a romantic relationship or having sexual contact with any student enrolled in the school system regardless of the student's age.
- Employees are prohibited from engaging in other forms of one-to-one electronic communications (e.g., voice, voice mail, email, texting, social media, and photo or video transmission) with students.
- Duty to Report: Employees must must immediately report if another employee is involved in an inappropriate relationship with a student.
- Employees must report to their supervisor any unsolicited one-to-one communication received from a student, lacking educational purpose.

### Policy Code: 40407310 Staff-Student Relations

The board expects all employees to maintain the highest professional, moral, and ethical standards in their interactions with students. Employees are required to provide an atmosphere conducive to learning through consistency and fairly applied discipline and established and maintained professional boundaries. Employees are expected to motivate each student to perform to their capacity while modeling the behavior expected of students in staff-student relationships.

The interactions and relationships between staff and students must be based upon cooperation, mutual respect, and an understanding of the appropriate boundaries between adults and students inside and outside of the educational setting. Employees are expected to demonstrate good judgment and to avoid the appearance of impropriety in their interactions with students. Employees must consult their supervisor any time they suspect or are unsure whether conduct is inappropriate or otherwise constitutes a violation of this or other board policy.

For the purposes of this policy, the terms "staff" and "employees" include independent contractors, school safety officers, and volunteers, but do not include student employees or student volunteers.

#### A. Romantic Relationships and Sexual Contact Prohibited

All employees are prohibited from dating, courting, or entering into a romantic relationship or having sexual contact with any student enrolled in the school system regardless of the student's age. Employees engaging in such inappropriate conduct will be subject to disciplinary action, up to and including dismissal, and may be subject to criminal action as provided in G.S. 14-202.4 and 14-27.32. Further, school system personnel shall provide no assistance to an individual in finding another job, beyond the routine transmittal of personnel or administrative files, if the individual engaged in sexual misconduct with a minor or a student in violation of the law.

#### B. Restrictions on Electronic Communications

1. In accordance with policy 7335, Employee Use of Social Media, employees are prohibited from communicating with current students through non-school-controlled social media except to the extent that the employee and student have an appropriate relationship which originated outside of the school setting. Any communication through social media authorized under policy 7335 must meet the professional standards established in this policy and must otherwise be consistent with law and all other board policy.
2. Instant messages will be treated as a form of communication through social media subject to the terms of policy 7335 and subsection B.1 above, regardless of whether the messaging service is actually provided through a social media service or otherwise.
3. Employees are prohibited from engaging in other forms of one-to-one electronic communications (e.g., voice, voice mail, email, texting, social media, and photo or video transmission) with students. This rule shall not apply, however, if one or more of the following circumstances exist:
  - a. the communication (1) is for an educational purpose, (2) is conducted through a school system-provided platform which archives all such communications for a period of at least three years (this requirement does not apply to telephone or voice mail communications), or is conducted via an electronic video-conferencing platform (e.g., Zoom) that has been approved by the superintendent or designee for instructional use, and (3) occurs after the employee has given prior notice to his or

# NHCS Board Policy

## 7312: Child Abuse & Threats to Safety

### Key Points:

- North Carolina has two separate systems that mandate reports to state authorities of suspected child abuse, neglect, dependency, or maltreatment and a third system for mandated reporting of certain crimes against juveniles to local law enforcement.
- Employees are legally required to immediately report to Administration and Law Enforcement if they have direct/indirect knowledge of a child who has been the victim of a sexual offense, physical injury, or misdemeanor child abuse.
- "misdemeanor child abuse, which occurs when a parent or any other person providing care or supervision to a child who is under the age of sixteen (1) inflicts or allows to be inflicted physical injury to the child by nonaccidental means or (2) creates or allows a substantial risk of physical injury to the child by nonaccidental means."

### Policy Code: 42407312 Child Abuse and Related Threats to Child Safety

The board is concerned with the health, safety, and welfare of all children and recognizes the legal and ethical obligations that school employees, contractors, and volunteers have to report known or suspected maltreatment of children. North Carolina has two separate systems that mandate reports to state authorities of suspected child abuse, neglect, dependency, or maltreatment and a third system for mandated reporting of certain crimes against juveniles to local law enforcement.

When a parent or other caretaker is suspected to have caused a child to be abused, neglected, or dependent, this information must be reported to the county child welfare agency. Suspected human trafficking, involuntary servitude, and sexual servitude of a child and death of a child as a result of maltreatment are special forms of child abuse under law and must be reported to the county child welfare agency, regardless of the relationship between the victim and the perpetrator. By contrast, suspected child maltreatment by a caregiver in a child care facility, including in a licensed preschool classroom or other licensed classroom or program operated by the school system, must be reported to the Department of Health and Human Services, Division of Child Development and Early Education. When the source of the harm or threat of harm to the child is uncertain, a report should be made to both the county child welfare agency and the Department of Health and Human Services, Division of Child Development and Early Education.

In addition, state law mandates reports to local law enforcement when a child is a victim of certain violent offenses, sexual offenses, or misdemeanor child abuse. An adult who knows or reasonably should have known of any of these offenses inflicted upon a child must report that information immediately.

The board of education supports all employees who in good faith make a report under North Carolina's mandated reporting laws.

#### A. Duty to Report Certain Crimes Against Children to Local Law Enforcement

A school employee, contractor, or volunteer is legally required to report to local law enforcement when the employee or volunteer knows or reasonably should know that a child has been a victim of any of the following crimes:

1. a sexual offense (which for purposes of this policy, the board interprets to mean any offense that relates to inappropriate sexual contact with a child);
2. an offense that inflicts serious bodily injury or serious physical injury upon the child by nonaccidental means;
3. an attempt, solicitation, or conspiracy to commit either offense described above, or aiding and abetting either offense; or
4. misdemeanor child abuse, which occurs when a parent or any other person providing care or supervision to a child who is under the age of sixteen (1) inflicts or allows to be inflicted physical injury to the child by nonaccidental means or (2) creates or allows a substantial risk of physical injury to the child by nonaccidental means.

Compliance with this reporting requirement does not relieve the employee or volunteer from his or her duty to report pursuant to Sections B and C of this policy. The employee, contractor, or volunteer also shall immediately report the cause to the principal.

A school employee, contractor, or volunteer is immune by statute from any state civil and/or criminal liability when making a report in good faith under this Section. An employee who fails to

# NHCS Board Policy

## 7335: Employee Use of Social Media

### Key Points:

- School employees may use only school-controlled social media or approved video conferencing platforms to communicate directly with current students about school-related matters.
- Employees are prohibited from knowingly communicating with current students through personal social media and shall not accept current students as "friends" or "followers".
- An employee seeking to utilize and/or establish a non-school-controlled social media website for instructional or other school-related purposes must have prior written approval from the principal and the superintendent or designee.
- Employees shall not post confidential information about students, employees, or school system business.
- Employees shall not use Internet postings to libel or defame the board, individual board members, students, or other school employees.

### Policy Code: 7335 Employee Use of Social Media

The board recognizes the importance of incorporating current technology tools, including new methods of electronic communication, into the classroom to enhance student learning. It further recognizes the importance of employees, students, and parents engaging, learning, collaborating, and sharing in digital environments as part of 21<sup>st</sup> Century learning. The board strives to ensure that electronic communication tools incorporated into the school curriculum are used responsibly and safely. As practicable, the board will provide access to secure social media tools and board approved technologies for use during instructional time and for school-sponsored activities in accordance with policies 3220, Technology in the Educational Program, and 3226(43)27320, Technology Responsible Use.

The board acknowledges that school employees may engage in the use of social media during their personal time. School employees who use social media for personal purposes must be mindful that they are responsible for their public conduct even when not acting in their capacities as school system employees. All school employees, including student teachers and independent contractors, shall comply with the requirements of this policy when using electronic social media for personal purposes. In addition, all school employees must comply with policy 40407310, Staff-Student Relations, when communicating with individual students through other electronic means, such as through voice, email, text-messaging, or video-conferencing platforms.

#### A. Definitions

##### 1. Social Media

For the purposes of this policy, "social media" refers to the various online technology tools that enable people to communicate easily over the Internet to share information and resources. It includes, but is not limited to: personal websites, blogs, wikis, social networking sites, online forums, virtual worlds, video-sharing websites, and any other Internet based applications which allow the exchange of user-generated content. For purposes of this policy, it also includes any form of instant or direct messaging available through such applications. Examples of social media include, but are not limited to, Web 2.0 tools, Facebook, Twitter, LinkedIn, YouTube, Instagram, TikTok, and social media components of learning management systems such as Google Classroom, Canvas, or Seesaw. The use of video conferencing platforms such as Zoom, Webex, and Google Meet is subject to policy 40407310, Staff-Student Relations.

##### 2. School Controlled Social Media

"School-controlled social media" are social media networks, tools, or activities that are under the direct control and management of the school system and that create an archived audit trail.

##### 3. Personal Social Media

"Personal social media" means any social media networks, tools, or activities that are not school-controlled.

#### B. Social Media Communications Involving Students

Employees are to maintain professional relationships with students at all times in accordance with policies 40407310, Staff-Student Relations, and 7230, Staff Responsibilities. The use of electronic media for communicating with students and parents is an extension of the employee's



# NHCS Board Policy

## 7340: Employee Dress & Appearance

### Key Points:

- Employees should be professionally, neatly, and appropriately attired for the work to be done.
- An employee's dress must not disrupt or distract from the educational process and must be in accordance with health and safety standards
- An employee's supervisor will make an initial determination of whether an employee's dress or appearance is inappropriate. In making this determination, the supervisor will consider the following factors: the nature of the work; whether the dress is consistent with a professional environment; health and safety factors; the nature of the employee's public contact and the normal expectations of outside parties with whom the employee will work; the employee's interaction with students; the prevailing practices of other workers in similar jobs; and any properly established guidelines for dress or appearance.

### Policy Code: 7340 Employee Dress and Appearance

The board believes that the appearance and the conduct of its faculty are of utmost importance in establishing a positive image for education in the community and for presenting a good example for students. Therefore, the board expects all personnel to be professionally, neatly, and appropriately attired for the work to be done. An employee's dress must not disrupt or distract from the educational process and must be in accordance with health and safety standards. The superintendent shall develop and communicate to employees guidelines for appropriate dress and appearance. Such guidelines (1) must be gender-neutral; (2) may authorize the principal or department supervisors to develop specific dress or appearance requirements for each school or department; (3) may authorize exemptions from the guidelines for employees performing specialized duties that require a different form of dress; and (4) must provide a process for offering reasonable accommodations when required by law.

Administrative and supervisory personnel shall set a good example in personal appearance and good manners and shall encourage and expect employees to dress in accordance with the board's expectations. An employee's supervisor will make an initial determination of whether an employee's dress or appearance is inappropriate. In making this determination, the supervisor will consider the following factors:

1. the nature of the work;
2. whether the dress is consistent with a professional environment;
3. health and safety factors;
4. the nature of the employee's public contact and the normal expectations of outside parties with whom the employee will work;
5. the employee's interaction with students;
6. the prevailing practices of other workers in similar jobs; and
7. any properly established guidelines for dress or appearance.

Supervisors shall review this policy with their staff at the beginning of each school year. If a supervisor determines that an employee's dress or appearance violates the established guidelines or is hazardous to the health or safety of the employee, fellow employees, or students, the supervisor shall counsel the employee regarding attire that is consistent with this policy and shall determine whether the employee is allowed to remain at work or must leave work to change his or her dress. Any failure to follow the supervisor's directive and/or blatant or repeated violations of this policy will subject the employee to disciplinary action, up to and including dismissal. Reasonable accommodations will be made as approved in writing by the appropriate supervisor for those employees who, because of a sincerely held religious belief, cultural heritage, or medical reason, request a waiver of a particular part of this policy for dress or appearance.

Legal References: Americans with Disabilities Act, 42 U.S.C. 12101 et seq.; Title VII of the Civil Rights Act of 1964, 42 U.S.C. 2000e et seq.; *Bostock v. Clayton County*, 390 U.S. 140 S. Ct. 1731 (2020); G.S. 115C:36 #47

# **CASES REPORTED THROUGH ETHIX 360/STAR COMPLIANCE BY SCHOOL YEAR**

## **Total Title IX cases reported during the school year Aug. 1, 2024 – Oct. 25, 2024**

- Total number of Ethix 360 reports - 223
- Total number of Title IX cases reported - 40
- Referred to the school – 24
- Number of cases currently within the Title IX group - 18
- Number of cases reported that happened off school grounds – 5
- Number of cases reported that were inconclusive/unsubstantiated – 2
- Number of cases that had the Informal Process Brief – 3
- Number of cases that a Formal Complaint was filed – 0

## **Total Title IX cases reported during the school year 2023 - 2024**

- Total number of Ethix 360 reports - 982
- Total number of Title IX cases reported - 167
- Referred to the school – 27
- Number of cases resolved within the Title IX group - 34
- Number of cases reported that happened off school grounds – 2
- Number of cases reported that were inconclusive/unsubstantiated – 3
- Number of cases that had the Informal Process Brief - 8
- Number of cases that a Formal Complaint was filed – 0

## **Total Title IX cases reported during the school year 2022-2023**

- Total number of Title IX cases reported - 256
- Referred to the school – 162
- Number of cases resolved within the Title IX group - 95
- Number of cases reported that happened off school grounds – 5
- Number of cases reported that were inconclusive/unsubstantiated – 6
- Number of cases that had the Informal Process Brief - 57
- Number of cases that a Formal Complaint was filed – 4

## **Total Title IX cases reported during the school year 2021-2022**

- Total number of Title IX cases reported - 225
- Referred to the school – 125
- Number of cases resolved within the Title IX group - 100
- Number of cases reported that happened off school grounds - 10
- Number of cases reported that were inconclusive/unsubstantiated – 18
- Number of cases that had the Informal Process Brief – 7
- Number of cases that a Formal Complaint was filed – 11

# NHCS TITLE IX TRAINING

Title of Training	Date	Location	Attendees	Training/Goals
Title IX Refresher for Assistant Principals	Sept. 12, 2024	Board of Education Building	Assistant Principals	Addressing the following topics: Initial Point of Contact, Field Trips, Bathrooms, Locker Rooms, Overnight Field Trips.
Title IX Refresher for Principals	Sept. 5, 2024	Board of Education Building	Principals	Addressing the following topics: Initial Point of Contact, Field Trips, Bathrooms, Locker Rooms, Overnight Field Trips.
Title IX Refresher for Transportation Employees	Aug. 21, 2024	Snipes Academy of Arts and Design	Transportation Employees	Informs attendees of NHCS Policies on School Safety, Staff Responsibilities, Child Abuse and Related Threats, and Reporting Requirements.
New Leaders Retreat for New Principals	Aug. 13, 2024	Hoggard H.S.	New Principals and Assistant Principals	Orient leadership new to NHCS on practices and policies to include the Duty to Report. This links to the slides used in the training (combined HR and Title IX), Title IX and Problem Solving Presentation, and the base presentation.

Beginning Teacher 1 Orientation: Title IX Table Talks	Aug. 12, 2024	Spencer Building	Beginning Teachers 1	
Leadership Retreat	July 9-10, 2024	Murray M.S.	Principals, Assistant Principals, Instructional Sup., Operations Sup.	Align the NHCS Strategic Plan. Strands include Academic Performance, Student Safety and Wellness, Supportive Environment for Teachers & Staff, Equity, Diversity & Inclusion, Family Engagement, and Community Partnerships. This is a link to the Title IX and Problem Solving Presentation. This presentation formed the base for subsequent presentations.
Port City United (PCU)/HR Training	Oct. 31, 2023	PCU Offices	All PCU employees who serve in NHCS schools per MOU	Inform attendees of Title IX policies and procedures to include the Duty to Report. Title IX and Problem-Solving Presentation.
Title IX Presentation for School Social Workers and Counselors	Oct. 31, 2023	Blair E.S.	Social Workers and Counselors (approximately 50 attendees)	Inform attendees of Title IX policies and procedures to include the Duty to Report. Title IX and Problem-Solving Presentation.
Title IX Overview for Family Liaison	Oct. 25, 2023	Spencer Building	Family Liaison Personnel (6-8 attendees)	Inform attendees of Title IX policies and procedures to include the Duty to Report. Title IX and Problem-Solving Presentation.
District-Wide Coaches Meeting	Aug. 23, 2023	Minnie Evans Art Center	Coaches and Trainers	Inform attendees of Title IX policies and procedures to include the Duty to Report. This links to the slides used in the training (combined HR and Title IX) Title IX and Problem-Solving Presentation.

H/R Vector Training	Aug. 21, 2023	Online	All employees	Informs attendees of NHCS Policies on School Safety, Staff Responsibilities, Child Abuse and Related Threats, and Reporting Requirements. The training is linked here. Requires NHCS password.
Transportation	Aug. 19, 2023	Blair Elementary	Bus Drivers, Bus Aides	Informs attendees of NHCS Policies on School Safety, Staff Responsibilities, Child Abuse and Related Threats, and Reporting Requirements. The training is linked here. Requires NHCS password.
Beginning Teacher	Aug. 14-16, 2023 Oct. 2, 2023 Dec. 18, 2023	Williston MS Spencer Building Spencer Building	New Teachers	Orient new teachers to NHCS practices and policies. Attendees had to watch HR and Title IX videos (Parts I and II), review the NHCS Title IX Website, and read NHCS Policies 7235 (Title IX Nondiscrimination on the Basis of Sex), 7236 (Title IX Sexual Harassment-Prohibited Conduct and Reporting Process), 7236-R (Title IX Sexual Harassment Definitions) and 7237 (Title IX Sexual Harassment Grievance Process), 7270 (School Safety), 7300 (Staff Responsibilities), and 7335 (Employee Use of Social Media) before attending the training. The Title IX office made a presentation and conducted scenario-based training at the on-site training.
New Leader Retreat	Aug. 2-3, 2023	Hoggard H.S.	Principals and Assistant Principals	Orient leadership new to NHCS on practices and policies to include the Duty to Report. This links to the slides used in the training (combined HR and Title IX) Title IX and

Leadership Retreat	July 18-19, 2023	Minnie Evans Art Center and Murray MS	BOE Members Principals Assistant Principals Instructional Sup. Operations Sup.	Problem Solving Presentation and the base presentation. Align the NHCS Strategic Plan. Strands include Academic Performance, Student Safety and Wellness, Supportive Environment for Teachers & Staff, Equity, Diversity & Inclusion, Family Engagement, and Community Partnerships. This is a link to the <u>Title IX and Problem Solving Presentation</u> . This presentation formed the base for subsequent presentations.
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Pre-Settlement Training

Title IX: "Checking the Blind Side"	Posted 2021	Online	General Public	Informs the reader of Title IX policies and procedures to include the duty to report, definitions, scenario based training, red flags of grooming and best practices.
Responsible Employee Training Under Title IX	Posted 2021	Online	Coaches and Trainers	Informs the viewer of Title IX and its practices to include the duty to report and indicators of grooming.
Keeping Students Safe: Know your Title IX	Posted 2021	Online	General Public	A Public Service Announcement that Informs the viewer of reporting methods.
Summer Leadership Academy Title IX	Jun 25, 2020	?	?	?

Bringing In the Bystander	Jun 25, 2020	Online	General Public	Gives the viewer an overview of the Bringing In the Bystander program offered through Health/PE courses to include the ability to identify abuse, sexual harassment, and how to assist victims.
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Please see the [NHCS Title IX Website](#) for further information

# John Doe 1-14 v. New Hanover County Board of Education et al

Post-claim Policies, Procedures, Education and Billets

## NHCS Policies

- 1310/4002 (Parental Involvement): Paragraph E(1) requires the principal or designee shall to notify parents before any changes are made to the names or pronouns used for their children in school records or by school personnel. Adopted on 10 Nov 20 and revised on 4 Oct 22, 5 Dec 23, 6 Feb 24 and 4 June 24.
- 1610/7800 (Professional and Staff Development). Adopted 10 Nov 22 and revised on 10 Feb 22 and 11 Jul 23. Requires professional and staff development to include a mental health training program regarding Child Abuse and Related Threats.
- 1710/4020/7230 (Discrimination and Harassment Prohibited by Federal Law). Adopted 11 Aug 20 and revised on 1 Feb 22 and 4 Oct 22. Prohibits harassment (assault, offensive touching, physical interference with work and requires employees to immediately report the harassment if they witness it or have "reliable" information that a student was harassed. This policy provides a procedure to address the complaint. The procedure includes an investigation and an appeal process. The policy requires NHCS to establish training to prevent harassment and foster an environment of understanding and respect. Finally, the policy requires NHCS to maintain records of harassment complaints and their resolution.
- 1720/4030/7235 (Title IX Nondiscrimination on the Basis of Sex). Adopted 11 Aug 20 and revised on 1 Feb 22 and 4 Oct 22. Provides procedures for addressing discrimination based on sex and sexual harassment. The policy designates a Title IX Coordinator.
- 1725/4035/7236 (Title IX Sexual Harassment-Prohibited Conduct and Reporting Process). Adopted 11 Aug 20 and revised on 1 Feb 22 and 2 Aug 22. This policy defines sexual harassment (sexual assault, rape, statutory rape, fondling, incest, stalking, dating violence, severe,

Enclosure /0



pervasive, and objectionably offensive unwelcome conduct, and conditioning the provision of aid, benefit, or service of the school system on an individual's partition in unwelcome sexual conduct. Additionally, the policy contains a reporting policy for students, employees, and others. The policy makes it mandatory for employees who have actual knowledge of sexual harassment or allegations of sexual harassment to report immediately. Moreover, it outlines the school's response to actual knowledge of sexual harassment.

- Regulation 1725/4035/7236-R (Title IX Sexual Harassment-Definitions). Adopted 18 Oct 22. Defines sexual assault, rape, statutory rape, fondling, incest, dating violence, and domestic violence. Also, the regulation defines consent.
- 3610 (Counseling Program). Adopted Feb 21 and revised 11 Jul 23 and 12 Mar 24. Places a mandatory reporting requirement on counselors who know or have cause to suspect maltreatment of a child.
- 4040/7310 (Staff-Student Relations). Adopted 4 May 21 and revised 1 Feb 22, 3 Oct 23 and 5 December 23. Requires employees and students to report inappropriate conduct. It allows students to use online sources to make the report.
- 4210 (Release of Students from School). Adopted 8 Jun 21. Allows a principal who judges a student's health or safety may be harmed by releasing a student to contact law enforcement and the Department of Social Services.
- 4240/7312 (Child Abuse and Related Threats to Child Safety) Adopted on 8 Jun 21. Lists an employee's duty to report child abuse.
- 4700 (Student Records). Adopted on 5 Oct 21 and revised on 5 Apr 22, 1 Nov 22, and 11 Jul 23. Authorizes NHCS to keep confidential information to protect a student from abuse or neglect.
- 5015 (School Volunteers). Adopted 5 Oct 21. A school volunteer program must include, among other things,

adequate screening of the volunteers based on the amount of contact they will have with students. It also allows the superintendent or designee to set criteria for volunteers to be subject to a criminal background check. Accordingly, the superintendent requires Level II volunteers, who will have unsupervised access to the students, to be subject to a criminal background check. See Frequently Asked Questions on the NHCS Community Partnerships & Engagement website. Volunteers include chaperones on student field trips and athletic coaches who don't receive compensation for their services. The policy does not apply to incidental adult visitors.

- 7100 (Recruitment and Selection of Personnel). Adopted on 4 Jan 22 and revised on 12 Mar 24. Requires NHCS to conduct criminal history checks and a check of sex offender registries on all final candidates for employment. Additionally, the policy requires NHCS to ask a final candidate for employment to consent to be fingerprinted and provide any other identifying information required to check the candidate's criminal history in the State and National Repositories of Criminal Histories. The Board of Education shall consider refusal to consent when making employment decisions.
- 7232 (Discrimination and Harassment in the Workplace). Adopted 11 Aug 20 and revised on 1 Feb 22 and 5 Dec 22. Prohibits discrimination, harassment, and sexual harassment. Lists reporting procedures.

#### NHCS Procedures

- 1710/4020/7230 (Discrimination and Harassment Prohibited by Federal Law). Adopted 11 Aug 20 and revised on 1 Feb 22 and 4 Oct 22. Describes a process to address discrimination and harassment complaints.
- 1726/4036/7237 (Title IX Sexual Harassment Grievance Process). Adopted 11 Aug 20 and revised 1 Feb 22 and 2 Aug 22. This policy provides a process for addressing sexual harassment complaints.

- 1740/4010 (Student and Parent Grievance Procedure). Adopted 6 Oct 20 and revised 5 Dec 23. Describes a procedure to resolve student and parent grievances.
- 1742/5060 (Responding to Complaints). Adopted 10 Nov 20. Describes general processes to address Complaints.
- 1750/7220 (Grievance Procedure for Employees). Adopted 6 Oct 20. Describes a process for employee grievances.
- Ethix 360. An Internet-based reporting tool linked to the NHCS website.
- Say Something. An anonymous reporting system linked to the NHCS website.

#### Education

- Bringing in the Bystander. A community of responsibility approach that teaches bystanders how to safely intervene in situations where incidents of sexual assault and relationship violence may be occurring.
- Shifting Boundaries. An evidence-informed intervention is used to raise awareness and prevent harassment.
- See Training Chart.

#### Billets

- Full-time Title IX Coordinator. NHCS created a full-time Title IX Coordinator position in 2020
- Full-Time Title IX Investigator. NHCS created a full-time Title IX Investigator position in 2020.