



ADMINISTRATIVE PROCEDURE

INAPPROPRIATE INTERACTIONS AMONG STUDENTS AND EMPLOYEES, INDEPENDENT CONTRACTORS, AND VOLUNTEERS

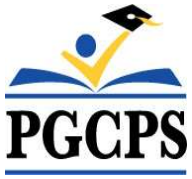
4219

Procedure No.

October 9, 2023

Date

- I. **PURPOSE:** The purpose of this administrative procedure is to state a clear prohibition against inappropriate relationships and interactions between **employees, independent contractors, vendors, contractors’/vendors’ employees, volunteers and students.** As provided below, this administrative procedure provides a framework of the types of conduct that are deemed inappropriate with students; an opportunity for employees, volunteers and contractors to recognize and correct problematic behavior; and consequences for failing to do so.
- II. **POLICY:** Employees, independent contractors and volunteers in Prince George’s County Public Schools (PGCPS) are expected *to maintain courteous and professional relationships with students.* They have a responsibility to provide an atmosphere conducive to learning through the maintenance of physical and emotional boundaries with students. These boundaries must be maintained regardless of the student’s age, the student’s enrollment in PGCPS, the perceived consensual nature of the relationship, the location of the activity or whether the employee directly supervises the student. (Board Policy 4400)
- III. **DEFINITIONS:**
- A. *Employee* – For the purposes of this administrative procedure, an *employee* shall include permanent and temporary workers employed by PGCPS, substitute teachers, independent contractors, vendors, contractors’/vendors’ employees and volunteers.
- B. *Student* – Includes a *student* who currently attends PGCPS and a *student* who attends any other elementary or secondary school system.
- IV. **PROCEDURES:**
- A. PGCPS employees shall not engage in any of the prohibited interactions outlined in Section IV.E. below with any student, regardless of whether the student is enrolled in our school system or another. These boundaries must be maintained regardless of the student’s age, the student’s enrollment in our school system, the perceived consensual nature of the relationship, the location of the activity or whether the employee directly supervises the student.
- B. While some of the behavior targeted below may seem inadvertent or harmless when done by well-meaning adults, the same behavior has been used at times as a means of “grooming” students for sexual interactions and other illicit forms of conduct.



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Consequently, any disciplinary action imposed for violation of this administrative procedure will take into account the totality of the circumstances specific to each case.

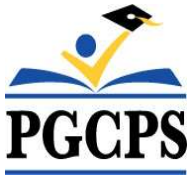
- C. Employees should understand that the list of interactions below are illustrative and not exhaustive of all examples of prohibited conduct.
- D. Limited exceptions are provided to the prohibited interactions below on page 5 of this administrative procedure.
- E. Prohibited Interactions

1. **Inappropriate relationship** includes, but is not limited to, interactions(s) where professional physical and emotional boundaries are compromised by:

- a. Being alone with a student in a windowless room with a closed or locked door, except for emergency situations, such as lockdown;
- b. Being alone with a student in a room with the lights off on PGCPS property or any time the employee is serving in their capacity as an employee;
- c. Covering up the window in a door, unless for a lockdown;
- d. Meeting students in non-work settings (*e.g.*, the library, the mall, a coffee shop) absent another employee being present and without parent/guardian permission;
- e. Using personal, non-PGCPS accounts or devices – such as cell phones, tablets and computers – to text, email or otherwise communicate with students and/or provide students with private cell phone numbers or email addresses without a supervisor or manager’s prior approval.

Employees must use Class Dojo, Edmodo, Remind or another PGCPS-approved group application to communicate with students and parents via phone or email;

- f. Associating or participating with students in any setting or activity that involves the use of alcohol, tobacco or illegal drugs;



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- g. Sponsoring gatherings or parties for students outside of school unless as part of an extracurricular activity that is appropriately supervised by additional staff members;
 - h. Sending students on personal errands for the employee;
 - i. Allowing students to drive the employee's personal or PGCPS-issued vehicle;
 - j. Allowing students to ride in the employee's personal or PGCPS-issued vehicle without prior supervisor and parent approval, with the exception of school transportation vehicles such as school buses;
 - k. Buying gifts for or providing money to students without a supervisor or manager's prior approval;
 - l. Allowing any student, without cause, under the employee's charge to engage in behavior that would not be tolerated if done by other students;
 - m. Knowingly granting students access to any portion of the employee's personal social networking website or webpage that is not accessible to the general public (*e.g.*, becoming a "friend" on Facebook, follower on X (formerly known as Twitter), or similar access), or which includes discussion of the employee's private life that would be inappropriate to discuss with a student at school;
 - n. Developing a friendship with a student that is beyond the appropriate professional relationship;
 - o. Using or entering student restrooms during the school day, subject to the exceptions outlined in Administrative Procedure 4221; or
 - p. Bullying, harassing and intimidating students.
2. **Inappropriate physical interactions** with students includes conduct such as:
- a. Hitting or kicking;
 - b. Throwing objects;
 - c. Pulling and/or grabbing the student's clothing and/or backpack;



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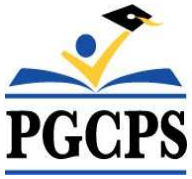
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- d. Kicking or striking furniture, throwing objects, or any other action done in an attempt to physically or emotionally intimidate the student;
 - e. Touching that results in bruising, scratching, etc.;
 - f. Tickling;
 - g. Kissing;
 - h. Any type of massage given by or to a student;
 - i. Horseplay
 - j. Corporal punishment, or other inappropriate student disciplinary practices, such as shaking, slapping, shoving or pinching; ostracizing; withholding food, light, or medical care; forcing the student to eat food they don't want; withholding bathroom privileges; excessive time out; excessive exercising; or locking the student out of the classroom or school;
 - k. Physical restraint or seclusion of students, except when consistent with PGCPS sponsored Crisis Prevention Intervention (CPI) training and the employee is trained and certified to use CPI; or
 - l. Any other action that would cause physical injury, bodily harm or emotionally intimidate a student.
3. **Inappropriate verbal interactions** with students includes conduct such as:
- a. Name-calling;
 - b. Using profanity;
 - c. Excessive yelling;
 - d. Discussing intimate details of one's personal life;
 - e. Encouraging students to keep secrets from others;



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- f. Sexual or offensive humor;
 - g. Shaming, belittling, or derogatory/negative remarks about a student, including negative comments about the student's physique, body development, dress, family, or academic achievement; and
 - h. Harsh language that may threaten, degrade, or humiliate students.
4. Any other conduct specifically prohibited by law.
- F. Exceptions
- 1. Certain reasonable touches may be appropriate in particular circumstances, such as a gentle pat on the back or shoulder, handshakes, high fives, or holding the hand of younger children to guide or escort them.
 - 2. For students receiving special education, related services and targeted intervention support:
 - a. Orientation and Mobility (O&M) teachers working with students with visual impairment students may be required to drive in a car with a student as per the student's Individualized Education Program (IEP). The O&M teacher shall inform the principal each time they are required to drive in a car with a student with visual impairment.
 - b. Psychologists, counselors, and other itinerant service providers may be required to work one-on-one with a student, as per the student's IEP or written intervention plan.
 - c. Students with IEPs, 504 plans, behavior intervention plans (BIP) or academic intervention plans may require assistance that require one or more of the above interactions.
 - 3. Actions for a student with personal care needs is addressed in Administrative Procedure 5166 – Toileting and Self Care.
 - 4. If it becomes necessary to transport a student home, and the employee has discussed the situation with their principal or immediate supervisor and has informed the



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student's parent/guardian, the employee shall ensure that a second employee is in the car when transporting the student home.

5. To prevent bodily harm of students, including intervening in a fight or physical altercation among students or self-harm that takes place in the presence of a school system employee, an employee may take reasonable action to prevent violence on school property or on a school-sponsored trip. The degree and force of the intervention needed to stop the fight or physical struggle may be as reasonably necessary to prevent violence, restore order and to protect the safety of the students fighting and the surrounding students.

G. Training

1. Prior to the beginning of each school years, all PGCPS employees will complete the SafeSchools training module that addresses this administrative procedure.
2. Principals shall review this administrative procedure with their employees mid-year of each school year.
3. The Division of Human Resources will review this administrative procedure as part of the on-boarding process with those employees who start working for PGCPS during the course of the school year, and who miss the annual training prior to the start of the school year.

H. Enforcement

1. A violation of this administrative procedure will result in disciplinary action, which may include written reprimand, suspension, or dismissal. Additionally, if applicable, a request may be made to the Maryland State Department of Education to suspend or revoke the employee's professional certificate. Child Protective Services and local police shall be notified as appropriate.
2. Any employee who possesses knowledge or evidence of possible violations of this administrative procedure must immediately inform their supervisor, school principal or appropriate school administrator.
3. All employees who have reason to suspect child abuse shall immediately report the suspected abuse in accordance with Administrative Procedure 5145. Employees shall be disciplined for failing to make such reports.



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V. **MONITORING AND COMPLIANCE:**

- A. The Office of Government Relations, Compliance, and Procedures (OGRCP) will track and monitor the employees' completion of SafeSchools modules.
- B. OGRCP will monitor principals' mid-year review of this administrative procedure.
- C. The Division of Human Resources will ensure that this administrative procedure is reviewed as part of the onboarding process for new employees.

VI. **RELATED POLICY AND PROCEDURES:**

- Board Policy 4400 – Inappropriate Relationships between Students and Employees, Volunteers and Contractors
- Administrative Procedure 4218 – Dating and Sexual Relationships Among Students and Employees, Independent Contractors and Volunteers
- Administrative Procedure 5145, Reporting Suspected Child Abuse and Neglect

VII. **MAINTENANCE AND UPDATE OF THIS ADMINISTRATIVE PROCEDURE:**

This administrative procedure originates with the Employee and Labor Relations Office (ELRO) and will be updated as needed.

VIII. **CANCELLATIONS AND SUPERSEDES:** This administrative procedure cancels and supersedes the version dated August 27, 2018.

IX. **EFFECTIVE DATE:** October 9, 2023