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Code of Conduct for Child Protection

General Expectations

Employees and volunteers must conduct themselves in a manner that supports the safety, dignity, privacy, and well-being of students.

Interactions with students must:

- relate to legitimate employment, instructional, extracurricular, volunteer, or Division-authorized responsibilities;
- maintain appropriate professional, physical, social-emotional, and digital boundaries;
- be transparent and capable of withstanding the scrutiny of a reasonable observer;
- reflect the needs and best interests of the student rather than the personal needs of the employee or volunteer; and
- comply with all applicable Division policies, regulations, procedures, and legislation.

Employees and volunteers must complete all training required by the Division, including any additional training required for specific responsibilities such as coaching. This preserves an explicit requirement from the current policy.

Prohibited Conduct and Boundary Violations

Employees and volunteers must not:

- engage in conduct contrary to the mandate, policies, regulations, or procedures of the Division;
- engage in conduct that places or may place a student in physical, emotional, psychological, or sexual jeopardy;
- expose a student to unsafe persons, circumstances, or environments;
- establish or maintain relationships with students that extend beyond appropriate professional or volunteer responsibilities;
- favour a student or provide special treatment unrelated to legitimate educational, accessibility, or programming needs;

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- use sexual, suggestive, explicit, degrading, or otherwise inappropriate language with or in the presence of students;
- make comments regarding a student's physical attractiveness or otherwise violate appropriate social-emotional boundaries;
- show, provide, display, or distribute sexually explicit, sexist, exploitative, or otherwise inappropriate material;
- engage in romantic or sexual relationships with students;
- engage in inappropriate physical contact with students; or
- engage in any conduct that could reasonably undermine student safety or the integrity of the employee's or volunteer's position of trust.

Communication and Digital Boundaries

Communication with students must occur for legitimate educational, extracurricular, or Division-authorized purposes and through appropriate communication methods.

Employees and volunteers must not engage in personal electronic communication or social-media interaction with students where that communication falls outside their assigned duties or is inconsistent with Division technology and social-media expectations.

Photographs, recordings, or other student images may only be taken, stored, accessed, or shared for authorized Division purposes and in accordance with applicable consent, privacy, technology, and media requirements.

Transportation and Activities Outside Assigned Responsibilities

Employees and volunteers must not transport students, meet privately with students, provide services to students outside their assigned responsibilities, or participate in other non-routine activities involving students unless the activity:

- is connected to an authorized Division purpose;
- has been appropriately disclosed and approved in advance where required; and
- complies with applicable Division procedures.

Circumstances requiring approval may include transportation, babysitting, respite care, employing a student privately, or other interactions outside normal assigned responsibilities.

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Rule of Two and One-to-One Interactions

The Division supports the Rule of Two as a child-protection practice. Wherever reasonably practicable, interactions with students outside of regular classroom instruction should be structured so that two adults are present, or another adult is aware of and able to observe or interrupt the interaction.

Where the presence of two adults is not practical or feasible, employees and volunteers must take reasonable measures to ensure interactions remain observable, interruptible, and transparent. Such measures may include:

- meeting in an open or visible area;
- keeping doors open or using spaces with unobstructed windows;
- ensuring another adult is aware of the interaction and its location;
- having another student or young person present where appropriate; or
- using another reasonable safeguard appropriate to the circumstances.

One-to-one interactions must serve a legitimate educational, support, extracurricular, or Division-authorized purpose and must maintain appropriate professional boundaries.

Gifts and Preferential Treatment

Employees and volunteers must not provide gifts or benefits to individual students in circumstances that may create favouritism, dependency, secrecy, or inappropriate relationships.

Nominal and contextually appropriate recognition may occur where it is reasonable, transparent, and consistent with school or Division practice.

Intimate, Explicit, Manipulated, or AI-Generated Images

Where an employee or volunteer receives, accesses, or becomes aware of an intimate, sexually explicit, exploitative, manipulated, AI-generated, or otherwise inappropriate image depicting a student, they must:

- immediately cease viewing the material;
- not copy, download, save, print, screenshot, forward, transmit, display, or otherwise distribute it;
- secure the device or material where necessary to prevent further access or distribution; and
- immediately report the matter to the principal or supervisor for further direction.

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Employees and volunteers must take reasonable steps to protect the privacy, dignity, and emotional well-being of students who may be victims of technology-facilitated exploitation.

Human Trafficking and Sexual Exploitation

Employees must remain attentive to circumstances that may indicate that a student is experiencing human trafficking, sexual exploitation, grooming, or another form of abuse.

Human trafficking and sexual exploitation can affect students in any community. Systemic inequities and barriers may increase vulnerability for some populations, including Indigenous and newcomer students, racialized students, students who identify as 2SLGBTQI+, students experiencing homelessness, and/or youth-in-care.

Possible indicators may include significant changes in:

- attendance or school engagement;
- relationships or social behaviour;
- emotional well-being;
- physical appearance or unexplained injuries;
- access to money or expensive items;
- online activity or secrecy involving electronic devices;
- travel, employment, or unexplained movement between locations; or
- relationships with unfamiliar or significantly older individuals.

No single indicator establishes that exploitation has occurred. Concerns must be reported and addressed through established child-protection procedures.

Reporting Procedure

Any employee or volunteer who becomes aware of conduct that may contravene this policy, or regulation must report the concern promptly to the appropriate principal or supervisor.

Employees and volunteers must report concerns and must not conduct their own investigation.

The principal or supervisor will consult with Human Resources and/or the Superintendent/CEO or designate, as appropriate, to determine the Division's response.

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Internal reporting does not replace an individual's legal obligation to report suspected child abuse or a child in need of protection to Child and Family Services or other appropriate authorities. Where there is an immediate threat to safety, emergency services must be contacted.

Response to Alleged Misconduct

Allegations and concerns will be addressed promptly and in accordance with applicable legislation, collective agreements, employment obligations, procedural fairness, and Division policies and procedures.

Failure to comply with this Code of Conduct may result in investigation and appropriate corrective or disciplinary action, depending upon the nature and severity of the conduct.

Legal References

- *The Child and Family Services Act*
- *The Public Schools Act*
- *The Human Rights Code*
- The Non-Consensual Distribution of Intimate Images Act, C.C.S.M. c. N93
- Safe Schools Regulation, M.R. 77/2005
- Provincial Code of Conduct: Behaviour Intervention and Response Using a Student-Centred and Strengths-Based Approach

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