



**Olive Grove Charter Schools, Inc.
Professional Boundaries Policy**

1. Purpose and Commitment

Olive Grove Charter Schools, Inc. (OGCS, Inc.) is committed to maintaining a safe, respectful, and professional learning environment in which all students are protected from abuse, grooming, harassment, exploitation, and boundary violations. All adults who work with or around students are expected to always maintain clear professional boundaries.

This policy establishes expectations for professional boundaries and appropriate conduct between students and Specified Adults, among and between students, and among and between adults who work (i.e., employed, under contract) or volunteer at OGCS, Inc. This policy is intended to prevent abuse, exploitation, harassment, and boundary blurring, and to support early recognition and reporting of concerning behavior.

2. Scope and Applicability

This policy applies to all charter school-related contexts at OGCS, Inc. and its charter schools, including but not limited to:

- School buildings, grounds, classrooms, offices, restrooms, and common areas.
- School-sponsored activities held on or off site, such as athletics, clubs, performances, field trips, other school-related programs, retreats, and travel.
- Transportation to and from school-sponsored activities, whether operated by OGCS, Inc. or a contracted service provider.
- Digital and virtual environments connected to OGCS, Inc., including learning management systems, school email, messaging platforms, virtual meetings, and online classes.
- Off site conduct when it involves students or school activities or affects student safety or the school environment.

All Specified Adults are subject to and must follow this policy as a requirement of their role, appointment, or authorization to access students through employment, volunteer service, or contractual access to students and school facilities.

3. Key Terms and Definitions

Term	Definition
Boundary blurring	Behavior that may not be clearly abusive but that weakens professional boundaries, creates exclusive access, secrecy, dependency, or reasonably appears improper.
Boundary violation	Any behavior that goes beyond what is reasonable and necessary to perform professional duties, including conduct that is sexual, exploitive, harassing, coercive, involves inappropriate personal disclosure, or that gives the appearance of misconduct.
Parent/Guardian	A parent, guardian, or other adult with legal custody, or other individual authorized to make authorized educational decisions for the student under applicable law or court order, as named in the Charter School’s records.
Corporal	Willful infliction of physical pain upon a child as a form of punishment or discipline.

Punishment	
Specified Adult	Any individual described in this policy having access and contact to students which includes employees, certificated and classified staff or the equivalent (i.e., instructional and non-instructional staff), administrators, governing body members (i.e., board members), volunteers, student teachers, interns, and contractors.
Electronic communication	Any communication using digital devices or platforms, including email, text messaging, direct messaging, group messaging applications, learning management systems, social media, chat functions, and video or audio calls.
Grooming	A pattern of conduct designed to gain a student’s trust, desensitize the student to inappropriate behavior, create secrecy, and reduce the likelihood that misconduct will be recognized or reported.
Legitimate educational purpose	A purpose directly tied to instruction, supervision, safety, or a defined school activity that is appropriate in content, timing, and frequency and aligned with school policies and procedures.
One-on-one interaction	Any interaction where a Specified Adult is alone with a student in person or in a private electronic space that is not observable or interruptible by others.
Professional boundary	The appropriate interaction and relationships in a professional setting, ensuring conduct remains respectful, role-appropriate, and free from personal, social, or emotional involvement that could impair safety.
Student	An individual enrolled in or participating in an educational program or activity offered by OGCS, Inc., regardless of age.
Sexualized Behavior	Sexualized talk, gestures, or conduct between people, including unwanted sexual comments, sharing or requesting sexual images, exposing private body parts, or sexual touching.

3.1 Abuse and Neglect Definitions

Abuse and neglect include the following:

Term	Definition
Neglect	Failure, refusal, or inability on the part of a Parent/Guardian, for reasons other than poverty, to provide necessary care, food, water, clothing, medical or dental care or shelter to seriously endanger the physical health of the child.
Physical Abuse	Physical injury inflicted on a child by other than accidental means. Physical injury includes, but is not limited to, lacerations, fractured bones, burns, internal injuries, severe or frequent bruising, or great bodily harm. Conduct qualifying as Physical Abuse may include, but is not limited to, hitting, spanking, shaking, slapping, unnecessary restraints, pushing, or other forceful physical contact.
Verbal Abuse	Language that is degrading or threatening, and includes verbal interactions such as name calling, insults, cursing, derogatory remarks, belittling, and shaming.
Sexual Abuse	A wide spectrum of interactions with a child including rape, certain physical assault, sexual battery, physical sexual contact, sexually explicit or offensive verbal communication, verbal sexual harassment, voyeurism, sexually oriented conversations, sexual intercourse or sexual

	touching of a student, sexual exploitation, exposing of genitalia, viewing of sexual activity, or permitting, allowing or encouraging a student to engage in prostitution.
Emotional Abuse	Conduct that reasonably causes harm to a child’s psychological or intellectual functioning, which is exhibited by emotional damage such as severe anxiety, depression, withdrawal, or aggression. Emotional damage may be demonstrated by substantial and observable changes in behavior, emotional response, or learning, which are incompatible with the child’s age or stage of development. Emotional Abuse includes the following conduct: shaming, humiliation, and cruelty.

4. General Expectations for Professional Conduct

Specified Adults are expected to always maintain professional relationships with students. This includes treating students with dignity and respect, using age-appropriate language, and maintaining professional distance regardless of a student’s behavior, family relationship, or community custom. Familiarity, informality, or a "like family" environment does not erase the obligation to function as a professional. Specified Adults are expected to avoid boundary blurring as defined in this policy and to seek guidance from their direct supervisor when interactions begin to shift from professional to personal.

Specified Adults are expected to use transparent practices. Interactions with students should be observable or interruptible whenever reasonably possible, documented when appropriate, and structured to include Parent/Guardians or other adults when circumstances warrant. Specified Adults are expected to avoid situations that could reasonably be misinterpreted by students, Parent/Guardians, or other members of the school community.

Students are expected to treat peers and adults with respect, to maintain appropriate boundaries with peers and adults, and to avoid bullying, harassment, hazing, or other misconduct.

5. Adult-Student Professional Boundaries

This section sets expectations for professional boundaries between students and adults at OGCS, Inc., including employees, adult volunteers, and school contractors.

5.1 General Rule

Specified Adults shall not engage in conduct with students that is sexual, romantic, exploitive, harassing, coercive, or excessively personal. Specified Adults shall not seek or encourage private, secret, or preferential relationships with students. Even when a student or Parent/Guardian invites a more informal relationship, the Specified Adult remains responsible for maintaining professional boundaries.

5.2 Summary of Acceptable and Unacceptable Conduct

The following standards apply in key areas of interaction. These examples are illustrative and not exhaustive.

5.2.1 Physical Contact

Acceptable Conduct	Unacceptable Conduct
<ul style="list-style-type: none"> ● Brief, context-appropriate gestures such as handshakes ● High-fives or fist bumps in public settings ● Side hugs ● Physical contact is necessary to prevent injury, assist with mobility, and/or assistance according to the student’s IEP 504, written health plan ● With permission, physical guidance required for athletics, performing arts, or specialized instruction when done in a professional manner 	<ul style="list-style-type: none"> ● Any sexual or romantic contact ● Kisses of any kind ● Lap-sitting*, back-rubs, massages**, tickling, or wrestling ● Prolonged or full-body hugs*, especially behind closed doors or with older students ● Sitting or lying close together on furniture in a way that appears intimate ● Any sexualized touching, groping or simulated sexual act ● Adult initiated hugs ● Touching bottom, chest, or genital areas***
<p>*Hugs and sitting on a charter school educator/employee lap/knee may be appropriate with young children (Pre-K - kindergarten). When in doubt about whether a particular physical interaction is appropriate, consult with your supervisor.</p> <p>**This does not apply to those students who need light physical touch or shoulder compressions for sensory issues, and as included in their behavior plans or IEPs. When in doubt about whether a particular physical interaction is appropriate, consult with your supervisor.</p> <p>***This does not apply to charter school employees who are aiding students with self-care or toileting, as needed. When in doubt about whether a particular physical interaction is appropriate, consult with your supervisor.</p>	

5.2.2 Verbal and Written Communication

Acceptable Conduct	Unacceptable Conduct
<ul style="list-style-type: none"> ● Professional, age-appropriate language and content ● Feedback on academic performance or behavior ● Neutral, respectful tone in conversations, emails, and written notes ● Using respectful language and names for students ● Giving age-appropriate praise and encouragement ● Correcting behavior in a calm, firm, and respectful manner ● Brief supportive conversations about 	<ul style="list-style-type: none"> ● Flirtatious remarks, romantic comments, or sexual innuendo ● Personal remarks on a student's body, physical development, attractiveness, or clothing (e.g., that outfit looks really good on you”) that are not strictly required for safety or dress code enforcement ● Sharing personal adult relationship problems, financial stress, or intimate details with students ● Using pet names, nicknames of endearment, or inside jokes that create

school, peer relations, or wellbeing that stay within the professional role

- special status
- Teasing or joking about a student's sexuality, gender, or relationships
- Name-calling
- Discussing sexual encounters
- Involving students in the personal problems or issues of School Adults
- Having secrets with students or asking students to keep secrets from Parent/Guardians or staff
- Shaming, belittling, or using harsh, demeaning, or threatening language causing emotional abuse
- Derogatory remarks about the student's family or associated personal relationships

5.2.3 Gifts Money and Favors

Acceptable Conduct	Unacceptable Conduct
<ul style="list-style-type: none"> ● Low-valued items within school policies and procedures provided to an entire class or clearly defined group ● Recognition items given under a school sponsored or classroom incentive system that is documented and applied consistently ● Emergency food, clothing, or supplies provided through a documented OGCS, Inc. process 	<ul style="list-style-type: none"> ● Personal gifts or money given to individual students ● Frequent or expensive personal gifts to an individual student ● Cash, gift cards, or personal loans to students or their families ● Soliciting or accepting expensive gifts or favors from students or Parent/Guardians ● Offering special privileges, grades, playing time, or recommendations in exchange for affection, loyalty, or secrecy ● Gifts of an intimate, romantic, or inappropriate nature, including jewelry, clothing, or personal photos ● Frequent or special favors that single out a student for special treatment

5.2.4 One-on-One On Site Interactions

Acceptable Conduct	Unacceptable Conduct
<ul style="list-style-type: none"> ● Meeting with a student for academic help, counseling, or behavior support in a classroom, office, or other location that is observable or interruptible (for example, door open or window unobstructed) ● One-on-one check ins when other adults are nearby and aware ● Scheduling meetings during regular school hours ● Documenting the purpose when appropriate ● Involving Parent/Guardians or designated support staff when serious concerns arise about a student's wellbeing or safety 	<ul style="list-style-type: none"> ● Meeting alone with a student in a locked or concealed room (except in emergency circumstances (i.e., shelter in-place, lock-down, etc.)) ● Repeated one-on-one meetings that are not documented, scheduled, or known to site leadership ● Isolating a student in remote or locked areas such as closets, storage rooms, or vehicles ● Meeting at a residence, restaurant, or other non-school setting without prior approval from their direct supervisor ● Any meeting that a reasonable person would view as secretive, intimate, or unnecessary for a legitimate educational purpose

5.2.5 One-on-One Interactions in Virtual Programming

Acceptable Conduct	Unacceptable Conduct
<ul style="list-style-type: none"> ● Using school approved and secured video platforms for instruction, counseling, and student support with privacy settings ● Scheduled 1:1 virtual session in advance, recording them in a shared calendar, and sharing the access link to a supervisor or designee or according to policies and procedures ● Document 1:1 virtual sessions that are out of the ordinary to include pertinent information (i.e., date and time, purpose, case notes, etc.) and share with a supervisor ● Invite a Parent/Guardian or supervisor to join the virtual session when feasible and appropriate, especially for younger students or sensitive topics ● Ensure that supervisory staff periodically observe virtual programming, including unannounced 	<ul style="list-style-type: none"> ● Holding 1:1 virtual sessions that are not scheduled, documented, or known to OGCS, Inc. leadership or others ● Using personal accounts, personal devices, or platforms that are not approved by OGCS, Inc. to communicate with students in virtual sessions ● Conducting virtual sessions late at night or from locations or settings that are professionally inappropriate (i.e., bed, bathrooms, or shower areas) ● Leaving chat, camera, or audio functions in a state that prevents monitoring, including disabling required recording or intentionally using private breakout rooms that are not supervised or observed by an additional adult or supervisor ● Having personal, romantic, or sexual conversations with students or sharing personal problems in ways that shift the

<p>visits according to OGCS, Inc. procedures</p> <ul style="list-style-type: none"> • Explain boundaries, reporting options, and virtual programming rules to students and Parent/Guardians in age-appropriate ways • Follow all expectations in the policy for physical contact, verbal interactions, and electronic communications during virtual sessions 	<p>focus away from the student</p> <ul style="list-style-type: none"> • Continuing 1:1 virtual contact with a student after the student leaves an OGCS, Inc. school unless the contact is approved, time limited, and documented as part of a formal transition plan or school procedure
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5.2.6 Transportation and Off Site Contact

Acceptable Conduct	Unacceptable Conduct
<ul style="list-style-type: none"> • Using school-approved and arranged transportation for trips, events, or competitions with appropriate permission forms • Maintaining appropriate supervision ratios and itineraries for off site events • Participating in school-sponsored events off site as part of assigned duties • Following established procedures for sign-in, sign-out, and head counts • Documenting destination, times, and passenger lists for school related transportation 	<ul style="list-style-type: none"> • Transporting a student alone in a personal vehicle except when in accordance with the school's transportation policies and procedures, in a documented emergency, followed by prompt notice to administration and Parent/Guardians • Providing regular rides to or from home, practices, or events as a personal favor • Inviting students to a Specified Adult's residence or staying overnight with students • Visiting a student's home without prior authorization from OGCS, Inc. and Parent/Guardian knowledge • Sitting next to or positioning a student in a way that creates unnecessary physical closeness or privacy

5.2.7 Social Contact On Site and Off Site

Acceptable Conduct	Unacceptable Conduct
<ul style="list-style-type: none"> • Participating and interacting with students at school-sponsored activities, performances, and athletic events in a professional manner • Ensuring interactions at events are in the public setting • Acknowledging a student in the community in a brief, appropriate interaction that maintains professional distance 	<ul style="list-style-type: none"> • "Dating" or romantic or social relationships with students • Socializing with students as peers or "friends" at restaurants, movies, parties, or other venues not sponsored by the school • Hosting or attending parties where students are present and alcohol or controlled substances are served • Using community roles (such as

<ul style="list-style-type: none"> • Communication with Parent/Guardians about school-related needs for transportation or events 	<p>coaching in another league or serving in a faith-based program) to create private or exclusive relationships with students that would not be acceptable in the school setting</p> <ul style="list-style-type: none"> • Providing transportation in a personal vehicle without prior authorization and written Parent/Guardian consent
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5.2.8 Use of Personal Residence and Private Spaces

Acceptable Conduct	Unacceptable Conduct
<ul style="list-style-type: none"> • Not using personal residences for student contact • Participating in school-approved homestay or hosting programs only under separate policies with screening, consent, and supervision safeguards 	<ul style="list-style-type: none"> • Inviting students to the Specified Adult's home for meals, tutoring, or socializing • Entering a student's bedroom, private living spaces, or hotel room except in an emergency • Sharing hotel rooms with students under any circumstance

5.2.9 Privacy, Personal Information, and Media

Acceptable Conduct	Unacceptable Conduct
<ul style="list-style-type: none"> • Respecting students' privacy in restrooms and locker rooms • Using staff-designated facilities when available • Limiting questions about a student's personal life to what is necessary for safety or support • Using school-approved devices and systems to capture or store student information, photographs, or video for school purposes 	<ul style="list-style-type: none"> • Taking photos or videos of students for personal use or storing them on personal devices without authorization • Posting images, names, or identifying information about students on personal social media accounts • Discussing confidential student information in public or through personal email, devices, or applications • Encouraging students to share intimate personal information that is not necessary for safety or support

6. Corporal Punishment

OGCS, Inc. prohibits corporal punishment. Specified Adults shall not use physical force to discipline students, including hitting, spanking, slapping, grabbing, pushing, shoving, kicking, or forcing a student to perform painful or excessive physical activity as a form of punishment, or otherwise causing physical pain.

This policy does not prevent using the minimum force that is reasonable and necessary allowable by policies and procedures to assist a student who is injured or in medical distress or using physical prompts or support that are part of an approved behavior support plan, Individualized Education Plan (IEP), 504 plan, health plan, or safety plan. Specified Adults shall follow applicable behavior restraint policies and procedures and shall immediately document any incident where significant physical force is used and concurrently notify school leadership..

7. Personal Care and Assistance

Some students require assistance with personal care, toileting, dressing, lifting, feeding, or medical procedures. When providing personal care, Specified Adults shall follow the student's IEP, 504 plan, health plan, or other written support plans.

Personal care shall protect the student's privacy and dignity to the greatest extent consistent with safety and supervision, shall use the minimum physical contact necessary, and shall remain task focused and brief. When reasonably feasible, personal care shall occur in locations designed for that purpose and in conditions that are observable by another adult, such as an open door, a viewing window, or two adults present.

Any unusual incident, injury, or concern that arises during personal care shall be reported promptly to the direct supervisor and to the student's Parent/Guardian. Specified Adults shall receive appropriate training before providing personal care and assistance

8. High Risk Settings and Activities

This section addresses professional boundaries among and between students in all charter school programs and activities offered by OGCS, Inc. Certain locations and activities present increased risk for boundary violations and student to student misconduct, including but not limited to restrooms, locker rooms, showers, changing areas, secluded hallways, transportation, field trips, extracurricular activities, transition times between classes/activities, free time, and overnight events.

OGCS, Inc. staff shall follow procedures for supervision and monitoring in these settings. At a minimum, authorized OGCS, Inc. employees shall actively supervise restrooms, locker rooms, and changing areas from outside the immediate area, shall avoid being alone with a student in these spaces, and shall interrupt horseplay, bullying, or sexualized behavior. Students' use of restrooms and changing areas should be scheduled and structured to promote privacy and safety when feasible.

Playgrounds and unstructured activity areas shall have assigned supervision zones with unobstructed sight lines and regular roster checks for student presence. Transportation shall follow OGCS, Inc. procedures, including written Parent/Guardian permission, trip rosters, seating and supervision plans, and restrictions on unscheduled stops and transportation in personal vehicles.

Off site and overnight activities shall be approved by the OGCS, Inc. Superintendent or designee shall have written supervision plans and shall provide separate sleeping arrangements for students and adults and for different genders unless an individualized approved plan requires another arrangement. These procedures may be further detailed in administrative regulations, field trip guidelines, facility use procedures, and the comprehensive school safety plan.

9. Student-Student Boundaries and Safe Peer Interaction

OGCS, Inc. expects students to treat one another with respect and to maintain appropriate boundaries in physical, verbal, and electronic interactions.

OGCS, Inc. shall promote healthy peer relationships and protect students from peer abuse and harassment in all

programs and activities. students are prohibited from conduct that includes, but not limited to bullying in any form, harassment, intimidation, hate-motivated behavior, sexual harassment or misconduct, unwanted physical contact, hazing, or cyberbullying.

Staff are expected to intervene when safe to do so and to report incidents or patterns of misconduct using OGCS, Inc.'s complaint, Title IX, and discipline procedures.

10. Adult-Adult Professional Boundaries and Culture

Adults who work at or with OGCS, Inc. shall conduct themselves in accordance with all policies and procedures outlined in the OGCS, Inc. Employee Handbook regarding professional conduct, including, treating one another with respect, refraining from harassment, discrimination, bullying, and retaliation, and avoiding personal relationships that create conflicts of interest in supervision, evaluation, or decision-making related to students.

11. Pre-Existing Relationships and Small Community Contexts

In some communities, staff may have pre-existing relationships with students or families, including family relationships, long-standing friendships, or shared participation in faith-based, recreational, or cultural organizations. These realities do not remove the obligation to maintain professional boundaries whenever the staff member is acting in a role connected to OGCS, Inc.

Staff who have a pre-existing relationship with a student or family shall notify their supervisor or the HR Manager and, when appropriate, work with their supervisor, HR Manager, or school leadership, as designated, to manage potential conflicts of interest. This may include but not limited to adjusting assignments, avoiding one-on-one situations that differ from the expectations in this policy, documenting any necessary transportation or support, involving additional adults when feasible, and recusing themselves from discipline, grading, or decisions that may be affected by the relationship. When community customs involve shared rides, informal childcare, or social gatherings, staff must treat these interactions as visible and transparent, avoid secrecy, and decline involvement when the risk cannot be managed in accordance with this policy.

12. Electronic Communication and Social Media Boundaries

12.1 Expectations

Electronic communication is a routine part of modern education, but private electronic spaces can quickly blur boundaries. Electronic communication between Specified Adults and students is expected to be limited, professional, and primarily conducted through school-approved platforms.

Electronic communication with students shall:

- Serve a legitimate educational or program-related purpose.
- Use OGCS, Inc.-approved systems and software.
- Abide by all OGCS, Inc. policies and procedures governing the use of electronic devices, software, artificial intelligence tools, networks, and electronic communications.
- Be professional in tone, content, and frequency.
- Involve Parent/Guardians or additional adults when appropriate, particularly for sustained one-on-one communication or sensitive issues.

Specified Adults shall not use electronic communication to create or maintain secret, intimate, or informal relationships with students.

12.2 Summary of Acceptable and Unacceptable Electronic Conduct

Category	Acceptable Conduct	Unacceptable Conduct
School email and learning platforms	<ul style="list-style-type: none"> Using OGCS, Inc. email and approved platforms for school business Including Parent/Guardians or another staff member where appropriate and necessary Keeping messages brief, professional, and related to assignments, schedules, or school activities 	<ul style="list-style-type: none"> Using personal email accounts for extended one-on-one conversations with students Deleting or altering messages to hide communication with students Sharing personal photos, jokes, or non-school content that blurs professional roles
Text and messaging applications	<ul style="list-style-type: none"> Sending group reminders to students and Parent/Guardians using school-approved systems Texting about urgent logistical or emergency issues, when necessary, with a Parent/Guardian or supervisor included when feasible 	<ul style="list-style-type: none"> Private one on one texting with students that is not school related Using applications with disappearing messages to communicate with students Late night or frequent informal texting that creates personal familiarity or dependence
Social media	<ul style="list-style-type: none"> Using official OGCS, Inc. social media pages or groups to share school approved information Communicating in open group forums that are visible to families and leadership 	<ul style="list-style-type: none"> Connecting with students or former students who are still minors on personal accounts, including friending or following Commenting on or reacting to students' personal posts in a way that creates or implies a private relationship Posting images or video of students on personal accounts or in unapproved platforms or forums
Audio and video calls and virtual platforms	<ul style="list-style-type: none"> Using school approved video platforms for instruction and support with privacy settings configured for safety Conducting virtual meetings at during school hours of operations or approved scheduling and in observable or documented formats 	<ul style="list-style-type: none"> Audio or video calls with students that occur late at night or from personal locations that are not appropriate for professional or school-related interactions (i.e. on bed, bedroom, bathroom or shower areas, etc.) Virtual meetings without notice to Parent/Guardians when notice is feasible

- Using private accounts to conceal identity, which are not known to OGCS, Inc. for virtual contact with students on virtual platforms

12.3 Photos, Video, and Virtual Environments

Specified Adults may capture or use student images, recordings, or virtual participation only for legitimate school purposes, in accordance with OGCS, Inc.’s media release and privacy practices.

Virtual meetings with individual students should be scheduled, documented, and conducted using approved platforms. Staff should avoid conducting virtual meetings from personal spaces that create the appearance of intimacy, such as beds or private bedrooms, and should use neutral or virtual backgrounds when feasible.

To support clarity, the following table summarizes acceptable and unacceptable practices related to photos, video, and virtual environments:

Acceptable Conduct	Unacceptable Conduct
<ul style="list-style-type: none"> ● Using OGCS, Inc.-approved devices, platforms, and applications to capture or store student images, audio, or video for instructional, supervisory, or documentation purposes ● Confirming media permissions or release status before publicly displaying or publishing student images or recordings ● Limiting recordings to what is reasonably necessary for the school-related purpose ● Framing images and recordings to minimize unnecessary exposure of other students, classrooms, or personal information ● Scheduling virtual meetings with students using approved platforms and documenting the date, time, and general purpose ● Using neutral, school-appropriate, or virtual backgrounds during virtual meetings ● Positioning devices so that other individuals in the staff member's household are not visible or able to overhear confidential discussions 	<ul style="list-style-type: none"> ● Using personal devices, accounts, or cloud storage to capture or retain student images, recordings, or virtual sessions for personal use ● Posting student images, names, or identifying information on personal social media accounts or non-approved websites ● Recording students in private settings such as restrooms, locker rooms, or changing areas, except as required by safety plans and with appropriate safeguards ● Capturing or sharing images or recordings that could reasonably be perceived as embarrassing, harassing, or exploitative ● Conducting virtual meetings from intimate personal spaces, such as beds or private bedrooms, or in attire that would not be acceptable in the school setting ● Allowing other household members or third parties to observe or overhear confidential student conversations without appropriate consent or necessity

13. Reporting Obligations and Response

All adults at all OGCS, Inc. locations are expected to take concerns about boundaries seriously. Any student,

Parent/Guardian, staff member, volunteer, or contractor who becomes aware of suspected boundary violations, grooming behavior, sexual or physical misconduct, or retaliation related to such concerns should report in accordance with the school's policies and procedures.

Reports may be made to:

- The site administrator
- Human Resources or
- The Title IX Coordinator for sex-based harassment or misconduct

All [mandated reporters](#) must comply with state law regarding the reporting of suspected child abuse or neglect. This duty is personal and cannot be delegated. A report to a supervisor does not replace the obligation to file a mandated report with the [appropriate agency](#).

More information on mandated reporting obligations can be found at: [Office of Child Abuse Prevention \(OCAP\)](#)

OGCS, Inc. will protect confidentiality to the extent permitted by law and operational needs and will not tolerate retaliation against any person who, in good faith, raises a concern or participates in an investigation. The school may implement interim safety measures, such as changes in supervision, reassignments, or limitations on contact, while concerns are reviewed.

Alleged violations of this policy will be reviewed promptly and, when applicable, coordinated with Title IX procedures, child abuse investigations by external agencies, student discipline processes, and employment or contractor investigations.

14. Enforcement and Consequences

Violations of this policy undermine the safety and integrity of OGCS, Inc.. The Superintendent or designee may take appropriate corrective or disciplinary action when a violation is substantiated, consistent with applicable law, collective bargaining agreements, contracts, and organizational policies.

Consequences may include verbal or written warnings, required training or coaching, reassignment or restriction of duties, removal from volunteer service, termination of employment, termination of contracts or campus access, and referral to law enforcement, child welfare, or licensing or credentialing agencies when warranted.

15. Employee, Volunteer, Contractor Misconduct

Any mistreatment or abuse of a student by an employee or volunteer will result in immediate disciplinary action, up to and including termination of employment or volunteer service.

OGCS, Inc. will fully cooperate with law enforcement and child protective services in the investigation and resolution of such incidents.

16. Student-to-Student Misconduct

OGCS, Inc. will not tolerate abuse, mistreatment, bullying, or sexual activity between students. Any conduct that endangers the safety or well-being of another student will prompt intervention and may result in disciplinary measures, up to and including dismissal from the program.

Nothing in this policy limits OGCS, Inc.'s authority to act more promptly or restrictively when necessary to protect students, staff, or the school community.

17. Related Policies and Cross References

This policy shall be implemented in coordination with, and does not replace, other OGCS, Inc. policies and procedures, including but not limited to:

- Charter School Employee Handbook
- Child abuse and neglect reporting procedures
- Title IX and sex-based harassment policies and grievance procedures
- Bullying and harassment prevention policies and complaint procedures
- Student discipline policies and codes of conduct
- Technology and acceptable use policies, including records retention and privacy
- Volunteer and visitor management procedures
- Field trips, athletics, transportation, and student supervision protocols

Administrative regulations may be developed or updated by OGCS, Inc. to provide additional operational details consistent with this policy.

APPENDIX A Transparency and Boundary Check (SAMPLE)

To support daily decision-making, OGCS, Inc., may use the following questions as a simple boundary check for Specified Adults:

1. Is the action necessary for a legitimate educational purpose?
2. Is the setting observable, interruptible, or otherwise transparent?
3. How would the interaction be viewed by a supervisor, Parent/Guardian, or school leadership?
4. Does the action create secrecy, special status, or emotional dependence for this student?
5. Could a reasonable person misinterpret the action?

If the answer to any question raises concern, the Specified Adult is expected to pause and seek guidance from school administrators.