CATHOLIC DISTRICT SCHOOL BOARD OF EASTERN ONTARIO
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BOARD ADMINISTRATIVE PROCEDURE

ADMINISTRATIVE PROCEDURE

603 Child Sexual Abuse Prevention and Reporting

DIRECTIONAL POLICY

Nurturing and Developing Human Resources

Title of Administrative Procedure:

Child Sexual Abuse Prevention and Reporting

Date Approved:

October 2025

Projected Review Date:

October 2030

Directional Policy Alignment:

The Administrative Procedure aligns with the Nurturing and Developing Human Resources Directional Policy. The purpose of the *Child Sexual Abuse Prevention and Reporting Administrative Procedure* is to create a shared understanding of the expectations the Board has with respect to employees' conduct in their professional and personal lives as it relates to public trust and confidence. This administrative procedure reflects the policy by outlining employees' obligation to ensure their conduct aligns with the professional and ethical standards expected in their role.

Alignment with Multi-Year Strategic Plan:

The *Child Sexual Abuse Prevention and Reporting Administrative Procedure* supports CDSBEO's mission to ensure healthy, safe, inclusive, and secure learning environments for students and staff. This administrative procedure supports the four tenets of To Belong, To Believe, To Nurture, and To Learn. The Board is committed to the safety and well-being of all its students, and it will ensure that Board employees are aware of their professional obligation to support the prevention of child sexual abuse and report students who may be in need of protection.

CDSBEO Strategic Plan 2025-2030

Purpose

The purpose of this administrative procedure is to ensure an organizational culture, with established practices, to support the prevention of child sexual abuse and the reporting of concerning behaviour. This includes annual engagement with students, staff, and families to raise awareness, build protective factors, and ensure access to supports and resources, in alignment with Erin's Law.

Principles

- All children have the right to feel safe at school without fear of abuse, whether emotional, physical, or sexual. It is a shared responsibility and legal obligation to ensure that these conditions are fulfilled.
- The Board believes that consensual and appropriate physical contact with students can be a component of caring, professional relationships to support student learning and well-being.
- The Board acknowledges that the relationship between staff or volunteers and students is a relationship of trust, power, and authority and therefore staff and volunteers will always bear the responsibility for conducting themselves with integrity and professionalism.
- The Board has a duty of care toward all students who attend CDSBEO schools and a moral and legal obligation to protect them from sexual abuse.
- The Board recognizes that sexual abuse can occur regardless of age, ancestry, colour, race, citizenship, ethnic origin, place of origin, creed, disability, family status, marital status or relationship status, gender, gender identity or expression, sex, sexual orientation as well as other grounds listed under the Human Rights Code.
- The Board recognizes that people who have experienced sexual abuse may experience a range of effects that can profoundly affect their lives and well-being.
- The Board believes that early identification and early intervention related to the concerning behaviours of staff or volunteers involving students is critical to prevention.

Action Required

1) Overview of Board Directives

In collaboration with all members of the school community, the Board shall make every effort to protect students from sexual abuse by:

a. creating and maintaining a culture of awareness about grooming and child sexual abuse;
b. creating and maintaining a culture of open dialogue about appropriate behaviour and understanding how to bring forward concerns about behaviour; and
c. ensuring processes are in place for reporting and investigating concerning behaviour.

d. Engaging students annually in developmentally appropriate education on child sexual abuse prevention, recognizing unsafe situations, and identifying trusted adults;

e. Providing annual information to parents and guardians about child sexual abuse prevention, reporting procedures, and available counselling and support resources; and

f. Ensuring all staff receive annual training that includes child sexual abuse prevention, reporting obligations, and available supports for students.

2) Scope and Application

This administrative procedure applies to the conduct of staff and volunteers that:

a. may arise during the course of the school day, activities and events, including but not limited to classroom spaces, greater school environment, activities, field trips, camps, practices, tryouts, travel and any meetings of CDSBEO; and

b. may occur outside of the Board school day or related events which could adversely affect relationships within the Board.

3) Concerning Behaviour

Behaviour may be concerning when a person in a position of authority, trust, or dependency (e.g., with a teacher, coach, or babysitter) exhibits any of the following practices:

I. Intimate or excessive communications, including:
- the use of suggestive or sexual language;
- personal phone calls, messages, texts, or social media for non-professional purposes; and/or
- communicating with children outside of work context.

II. Favouritism, including:
- paying a lot of attention to a particular student;
- displaying personal preferences for children of a certain age or gender;
- creating opportunities for time alone;
- excessive physical contact or other behaviour which focuses on a particular child;
- giving or sending personalized gifts; and/or
- allowing privileges that are excessive, unwarranted, or inappropriate.

III. Sexualized behaviour, including:
- the making of sexual references;
- the use of suggestive language or jokes;
- conversations with a student(s) showing inappropriate interest in their sexual history;
- encouraging sexual activity; and/or
- exposing a child to sexual interactions or imagery.

IV. Normalizing or grooming tendencies, including:
- minimizing inappropriate/concerning interactions with children;
- distorting relationships with children; and/or
- repeated use of poor judgement.

4) Behaviour Expectations

The following expectations apply to all staff and volunteers:

a) Concerning behaviour, grooming or any form of sexual relationship with students is strictly prohibited.
b) All interactions with students, [i.e. electronic exchanges (email, text or social media) and/or transportation in personal vehicles] must be:
    - through their CDSBEO Board account;
    - known to the parents/guardians of the student;
    - connected to work/volunteer duties and work hours;
    - meeting the student's learning and well-being needs and not the needs of staff members or volunteers.

Where transportation of a student in a personal vehicle is required due to the lack of alternative transportation, staff are not to transport students alone, and written consent of the parent or guardian must be obtained in accordance with the Board's Volunteer Driver requirements.

c) Staff are expected to act in compliance with the:
    - Professional Standards of the Ontario College of Teachers which includes the Ethical Standards for the Teaching Profession as well as other related professional College associations (i.e. College of Early Childhood Educators, College of Registered Psychotherapists of Ontario);
    - CDSBEO Use of Electronic Communications and Social Media Administrative Procedure;
    - OCT Duty to Report Professional Advisory; and
    - OCT Professional Advisory: Maintaining Professionalism - Use of Electronic Communication.
d) Photos or videos of a student shall only be taken for reasons that are consistent with professional duties. Any use of photos or videos must only occur with the written consent of parents and guardians obtained in accordance with the Use of Student Information and Image Administrative Procedure and they must be deleted from any personal device.
e) Volunteers will not contact students via individual electronic exchange. If an electronic exchange with students is required to fulfill a volunteer activity, it shall only occur via a staff member of the Board using the student's CDSBEO account.
f) Gifts to students are not encouraged or expected. Careful consideration must be made so that any recognition of achievement must be available to all. On rare occasions where a gift is appropriate, it must be carried out within the workplace, in the presence of others, with the knowledge of the principal/supervisor and parent/guardian; and in a manner which does not display favouritism.

5) Disclosure and Reporting

Staff and volunteers who observe suspicious inappropriate behaviour with students contrary to the prohibitions in this procedure, will immediately raise their concerns with their principal/supervisor and will complete *Appendix A – Form for Reporting Concerning Behaviour*.

Where a student reports Concerning Behaviour, the steps outlined in *Appendix B – Protocol for Reporting* will be followed.

Staff and volunteers have a mandatory Duty to Report any concern where a child's welfare is at risk. Reports should be made directly to the appropriate Children's Aid Society (CAS) (i.e. Family and Children's Services of Lanark, Leeds, and Grenville, the Children's Aid Society of Stormont, Dundas, and Glengarry, or Valoris in Prescott-Russell) as soon as possible and it should also be reported to their appropriate principal/supervisor.

Parents or guardians do not need to be informed if the victim is age 18 or older or is 16 or 17 years old and has been withdrawn from parental control.

The Board prohibits engaging in, or threatening to engage in, retaliation against anyone who discloses, reports, or otherwise provides information with respect to any incident of inappropriate conduct.

6) Investigations

Only authorized staff or external organizations shall conduct an investigation into allegations of Concerning Behaviour or other violations of the obligations in this procedure.

7) Support for Students

The principal/supervisor or designate will offer support to students through and following disclosures by:

- ensuring that students have access to school or board supports;
- informing the student that the information may be shared with their parents/guardians and the appropriate individuals/organizations who need to know to ensure their safety; and
- avoiding school-wide and class communication regarding the incident, unless required in order to protect student safety;
- ensuring students are annually informed, in age-appropriate ways, about how to recognize abuse and how to report it to a trusted adult.

8) Accountability

Every employee that has direct contact with students will complete Child Sexual Abuse Prevention and Reporting training on an annual basis.

The Board will also ensure that students and families are annually engaged and informed in accordance with Erin's Law.

Failure to adhere to the obligations contained in this procedure including reporting obligations may result in disciplinary action, as per the CDSBEO Discipline, Suspension, and Dismissal Administrative Procedure.

Responsibilities

The Board of Trustees is responsible for:

- Reviewing this administrative procedure as part of its regular policy and administrative procedures review cycle.

The Director of Education is responsible for:

- Ensuring the implementation of and compliance with this administrative procedure.

Superintendent of Human Resources or designate is responsible for:

- Ensuring that all appropriate CDSBEO employees complete annual Child Sexual Abuse Prevention and Reporting training, confirming their understanding of, and responsibilities for, ensuring child protection;
- Having processes in place for the reporting of concerning behaviour and the documentation of allegations of misconduct; and
- Providing a fair and professional assessment of and follow-up on reported concerning behaviour, with the support of the appropriate agencies, if necessary, while providing protection of students and their privacy.

Superintendent of Schools and System Portfolios or designate is responsible for:

- Ensuring principals and vice-principals act in a manner which is consistent with the application of this administrative procedure;
- Ensuring that all staff for whom they have supervisory responsibility, including all volunteers, are aware of the obligations under this administrative procedure.
- Ensuring that students receive education regarding the issues of grooming, disclosures, consent, and reporting child abuse;
- Coordinating annual, developmentally appropriate education for students on child sexual abuse prevention and reporting (i.e. Issues of grooming, disclosures, consent, and reporting child abuse);
- Coordinating annual information for parents and guardians about child sexual abuse prevention and available supports, and
- Notifying the Superintendent of Human Resources or designate of any allegations of breach of this procedure.

Principals and Vice-Principals are responsible for:

- Ensuring staff whom they supervise are aware of the requirements under this administrative procedure as well as any volunteers;

- Ensuring that all staff and volunteers are educated about their duty to maintain safe learning environments that are free of child sexual abuse and exploitation;
- Ensuring that students are annually engaged in developmentally appropriate education on child sexual abuse prevention and reporting (i.e. Issues of grooming, disclosures, consent, and reporting child abuse);
- Ensuring that parents and guardians receive annual information about child sexual abuse prevention and available supports;
- Informing the Superintendent of Human Resources or designate of any allegations of physical, sexual, and/or emotional harm of a student involving a board employee; and
- Following-up on reported concerning behaviour reported on Appendix A – Form for Reporting Concerning Behaviour.
- Ensuring that all students are educated about grooming, disclosure, consent, and how to get help if they or someone they know are in need of protection.

Staff are responsible for:

- Understanding and complying with this administrative procedure;
- Immediately reporting issues concerning the possible sexual abuse and/or grooming of children to the school administration/supervisor in accordance with the Teaching Profession Act, R.S.O. 1990, s. 12(2);
- Ensuring that they understand their duty to maintain safe learning environments that are free of child sexual abuse and exploitation;
- Ensuring their interactions with students are appropriate and transparent at all times and meet the students' learning and well-being needs and not their own needs;
- Completing annual Board training on Child Sexual Abuse Prevention and Reporting and Duty to Report as well as other necessary related training;
- Encouraging a culture of reporting;
- Reporting concerning behaviours to their principal or supervisor and completing Appendix A – Form for Reporting Concerning Behaviour;
- In addition to reporting the concern to the principal or supervisor and completing Appendix A, a staff member should submit a report to the police or the Children's Aid Society (CAS) where required;
- Acting in compliance with the Professional Standards of the Ontario College of Teachers which includes the Ethical Standards for the Teaching Profession, the Duty to Report Professional Advisory, and Professional Advisory: Maintaining Professionalism - Use of Electronic Communication and Social Media, and the CDSBEO Administrative Procedure Use of Electronic Communications and Social Media and accompanying guidelines for employees.
- Complying with the delivery of the curriculum and school programming expectations related to grooming, disclosure, consent, and how to disclose child abuse.
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Parents and guardians are responsible for:

- ensuring any suspicion or disclosure of concerning behaviour of staff or volunteers is reported to school administration in a timely fashion. If the concerning behaviour involves the school administration, parents and guardians should report their concerns to the superintendent of the school.

Progress Indicators

All Board employees and volunteers are aware of, and fulfill, their professional obligation (i.e. completing annual training) to support the prevention of child sexual abuse and to report any concerning behaviour.

Definitions

- **Appropriate Physical Contact** means touching a student, within reasonable boundaries, in response to meeting their education and well-being needs.

- **Board** means the Catholic District School Board of Eastern Ontario.

- **Boundaries** – The Ontario College of Teachers references the definition of boundaries as the verbal, physical, emotional and social distances that an educator must maintain in order to ensure structure, security, and predictability in an educational environment.

- **Child** – Under the Child, Youth and Family Services Act, 2017, S.O. 2017, c. 14, Sched. 1, a child is defined as a person younger than 18.
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- **Concerning Behaviour** means behaviour deemed by a reasonable observer as possibly violating reasonable boundaries, posing a risk to the personal integrity or security of a student, and/or contributing to a student's physical, psychological or emotional discomfort/jeopardy.

- **Erin's Law (Child Sexual Abuse Prevention and Reporting), 2024** is a legislative amendment to Ontario's Education Act designed to strengthen child protection through education, awareness, and reporting mechanisms. It is names after Erin Merryn, a survivor and advocate for child sexual abuse prevention.
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- **Favouritism** means singling out a student or certain students, providing unfair or preferential treatment, attention, and/or privileges.

- **Grooming** is a purposeful process used to manipulate the perception of a child and the adults around the child to gain sexual access and ongoing access to that child.

- **A volunteer,** for the purpose of the policy, is someone who is not employed by the school board and works directly with students.

- **Reasonable** – refers to the actions of an average person, exercising normal and honest judgment.
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- **Staff,** for the purpose of this administrative procedure, is someone who is employed by the school board and works directly with students.

Related Documents

- Appendix A - Form for Reporting Concerning Behaviour
- Appendix B - Protocol for Reporting and Investigating Concerning Behaviour

References

- Child, Youth and Family Services Act, 2017, S.O. 2017, c. 14 Sched. 1
- Policy/Program Memorandum 128 - The Provincial Code of Conduct and School Boards Code of Conduct
- Bill 123, Erin's Law (Child Sexual Abuse Prevention and Reporting), 2024 - Legislative Assembly of Ontario
- Ontario Colleges of Teachers Act, 1996
- The Ontario College of Teachers
- The Ontario College of Teachers - Professional Advisory: Duty to Report
- The Ontario College of Teachers - Professional Advisory: Maintaining Professionalism - Use of Electronic Communication and Social Media
- Use of Electronic Communications and Social Media Administrative Procedure
- CDSBEO Social Media Guidelines for Employees
- CDSBEO Discipline, Suspension, and Dismissal Administrative Procedure
- CDSBEO Use of Student Information and Image Administrative Procedure