

Policy Name: Conflict of Interest and Business Ethics		
Originate Date: 07/14/2004 Revised Date: 06/21/2023		
Approved By: Administration Policy Number: SE-PPCIBE57		

Professional conflicts of interest and/or unethical business practice can lead to areas of both moral ambiguity and legal consequences. The School of Expressive Arts and Learning recognizes and respects an individual employee's right to engage in activities or alternative employment outside of his or her position at S.E.A.L., on the condition such activities do not conflict with or reflect poorly on the school.

Administration reserves the right, however, to determine when an employee's activities represent a conflict with the School of Expressive Arts and Learning's intentions and programming. Similarly, the School of Expressive Arts and Learning may take any necessary action to resolve the conflict—including instating a probationary period and/or termination of employment.

It is expected that all employees of S.E.A.L. remain committed to high levels of ethical conduct, and seek guidance from a supervisor or Human Resources if met with professional situations of uncertainty. Similarly, all S.E.A.L. employees should make a commitment to ongoing professional development. Included below are examples of potential unethical behavior, or scenarios that may indicate an employee may not be able to properly perform the duties of his or her job in an integrous and responsible manner. Employees must refrain from taking part in,willfully acting on, or exerting influence on any activity that does not protect the best interest of the program or students.

- Utilizing a student's personal information to solicit private practice clients for counseling, tutoring, etc.
- Accepting substantial gifts from a student, student's family, or outside organizations.
- Using materials, equipment, supplies, services, or property purchased by the school for personal gains.
- Participating in civic or professional organization activities in a manner whereby confidential school or student information is divulged.
- Misusing privileged information or revealing confidential information about colleagues, students, or students' families to outsiders or former employees.
- Using one's position in the school or knowledge of its affairs for outside personal gains.
- Falsifying or "predicting" data regarding student progress or goals.
- Using one's permissions/access to the S.E.A.L. google drive for purposes of obtaining student/district information for personal use, acquiring programmatic information for reasons other than the intended purposes, or stealing any other information from the network for personal gains.
- Non-compliance with legal matters such as Mandated Reporting.
- Participation in unlawful acts of discrimination, harassment or hostility.
- Dishonesty regarding job duties or interactions with students/colleagues.

The employee has reviewed and understands the above policy.			
EMPLOYEE SIGNATURE	DATE		



Policy Name: Employee Code of Professional Conduct		
Originate Date: 06/27/2023		
Approved By: Administration Policy Number: SE-PPCC01		

School of Expressive Arts and Learning employees are expected to maintain high standards in their school relationships, to demonstrate integrity and honesty, to be considerate and cooperative, and to maintain professional and appropriate relationships with students, parents, employees, and others. In addition, the <u>Code of Ethics for Illinois Educators</u>, adopted by the Illinois State Board of Education, is incorporated into this Code of Conduct. Any employee who sexually harasses a student, willfully or negligently fails to report an instance of suspected child abuse or neglect as required by the <u>Abused and Neglected Child Reporting Act (325 ILCS 5/)</u>, engages in grooming as defined in <u>720 ILCS 5/11-25</u>, engages in grooming behaviors, violates boundaries for appropriate school employee-student conduct, engages in sexual misconduct as defined in <u>105 ILCS 5/22-85.5</u>, or otherwise violates an employee conduct standard will be subject to discipline up to and including dismissal.

- 1. Standards related to school employee-student conduct shall comply with the <u>Code of Ethics for Illinois</u> <u>Educators</u>, adopted by the Illinois State Board of Education;
- 2. Prohibited grooming behaviors and sexual misconduct include, but are not limited to (i) any act, including but not limited to, any verbal, nonverbal, written, or electronic communication or physical activity, (ii) by an employee with direct contact with a student, (iii) that is directed toward or with a student to establish a romantic or sexual relationship with the student. Examples include, but are not limited to:
  - a. A sexual or romantic invitation
  - b. Dating or soliciting a date
  - c. Engaging in sexualized or romantic dialog
  - d. Making sexually suggestive comments that are directed toward or with a student
  - e. Self-disclosure or physical exposure of a sexual, romantic, or erotic nature
  - f. A sexual, indecent, romantic, or erotic contact with the student
- 3. Employees are expected to maintain professional relationships with students.
  - a. Employees are strictly prohibited from using any form of communication with students (e-mails, letters, notes, text messages, phone calls, conversations) that includes any subject matter that would be deemed unprofessional and inappropriate between an employee and student.

Examples include, but are not limited to:

- 1. Any communication or "Friending" via Social Media (i.e. Facebook, Instagram, Snapchat, TikTok, Twitter, etc.)
- b. Employees are not permitted to transport students in the employee's privately owned vehicle. Student transport in a vehicle other than S.E.A.L. transportation (vans and buses) must be by a member of the S.E.A.L. Leadership Team.



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- c. Employees will limit the use of personal devices to take photographs or videos of students and student work. Employees will either immediately save files onto the Google Drive as part of the student's academic or clinical record or will promptly send an electronic file to the administrative assistant for the S.E.A.L. file and slideshow. Employees will promptly delete the file off of their personal device and Cloud service. Students whose families have not signed the photo release should never be photographed or recorded. Employees will not share photographs of students, student work or any identifying information about students with anyone outside the SEAL program.
- d. Employees are not permitted to meet with a student or contact a student outside the employee's professional role. Employees are expected to avoid crossing boundaries that result in an actual or perceived inappropriate relationship.

Examples include, but are not limited to:

- 1. Visiting a student at their home, place of employment, or community to engage in social activities outside of attending non-SEAL graduation or non-SEAL performing art shows.
- 4. Employees are mandated reporters and required to comply with all reporting requirements of the <u>Abused and Neglected Child Reporting Act (325 ILCS 5/)</u>, <u>Title IX of the Education Amendments of 1972 (20 U.S.C. §1681 et seq.)</u>, and the <u>Elementary and Secondary Education Act (20 U.S.C. § 7926)</u>;
- 5. Employees, students, parents, and any third party can report prohibited behaviors and/or boundary violations pursuant to <u>Conflict of Interest and Business Ethics (SE-PPCIBE57)</u> and <u>Abused and Neglected Child Reporting Act (325 ILCS 5/)</u>, to SEAL Leadership, S.E.A.L. Human Resources, Supervisor or any other S.E.A.L. administrator or employee the person feels comfortable reporting to; and
- 6. Employees are required to complete annual training *related* to educator ethics, child abuse, grooming behaviors, and boundary violations as required by law and policies

DCFS Recognizing and Reporting Child Abuse: Traning for Mandated Reporters (video)

Conflict of Interest and Business Ethics SE-PPCIBE57

Staff Behavior With and Towards Students SE-PPSS02

Privacy, Dignity & Personal Care SE-PPPD04

Working with Students in a Therapeutic Day School Environment

The employee has reviewed and understands the above policy.		
EMPLOYEE SIGNATURE	DATE	



Policy Name: Privacy, Dignity, and Personal Care		
Originate Date: 07/14/2004 Revised Date: 02/25/2005		
Approved By: Administration Policy Number: SE-PPPD04		

The School of Expressive Arts and Learning, as an organization, has a particular influence on the personal and social development of each student. We aim to create an inclusive, caring, and supportive atmosphere within the school where students, staff and parents know they are valued. Such an atmosphere is fostered by the contributions made by each of our staff members.

Wherever students, of all ages and ability levels, can learn to assist in carrying out aspects of personal care, they should be encouraged to do so. This supports the school's education for personal and social development programming in terms of giving students life skills and developing their independence. In some situations, students require higher levels of staff assistance in completing areas of personal care and hygiene.

#### **Guidelines:**

Personal care can be a positive experience both for the staff involved and for the student. It is essential that every student is treated as an individual and that care is given as gently and as sensitively as possible. The student should be allowed to exercise choice and will be supported in developing a positive image of his/her own body. This includes privacy in restrooms and discretion by staff members when necessary.

## Principles for supporting dignity and respect:

- Engage in conversations that respect student's personal boundaries, private home-life experiences, and respects their privacy.
- Allow students a choice in the sequence of toileting care, if applicable.
- Ensure that privacy is appropriate to the student's age and ability level while also being mindful
  of safety and hygienic standards.
- Allow the student to care for him/herself as much as possible.
- Be aware of and responsive to the student's reactions (ex: conversations about hygiene should be held in private or with a student's counselor).
- If additional assistance is needed during a personal care situation, be sure to ask for support appropriately and in a manner that does not disclose personal information about the student or the circumstance for others to overhear.
- When carrying out personal care away from the school building, remember the main priority of privacy and safety while off-grounds.

Given the right approach, personal care can provide opportunities to teach students about the value of their own bodies, to develop their safety skills and to enhance their self-esteem. Practices contrary to this policy should be reported to a coordinator immediately.



Policy Name: Privacy, Dignity, and Personal Care		
Originate Date: 07/14/2004 Revised Date: 02/25/2005		
Approved By: Administration	Policy Number: SE-PPPD04	

The employee has reviewed and understands	the above policy.	
EMPLOYEE SIGNATURE	DATE	



Policy Name: Staff Behavior With/Towards Students		
Originate Date: 10/14/2004 Revised Date: 08/23/2023		
Approved By: Administration Policy Number: SE-PPSS02		

The following policy was created to provide a standard set of therapeutic guidelines to define boundaries and interactions between staff and students within the milieu.

- Staff may not give gifts, mementos or souvenirs in a way that singles out a particular student.
- Staff members should not share personal or sensitive information about themselves, other staff, or the program with students. This includes staff members sharing personal medical information.
- Sharing of personal, social, religious, political or moral beliefs with a student is not permitted.
- Staff members should not discuss negative opinions, regarding other staff or the program infront
  of students. Students in a therapeutic day school are in a vulnerable position, and deserve staff
  members who act as a supportive and united front.
- Staff are required to model appropriate boundaries, set-limits, and avoid power struggle situations. Methods for achieving this behavior are trained annually in the Non-Violent Crisis Intervention training program.
- Physical contact with students should be limited. This is particularly important for students who
  have been victims of sexual abuse, physical abuse, and past trauma. Although touch can be a
  necessary and therapeutic intervention, an understanding of therapeutic boundaries should be
  emphasized. Staff should have knowledge of the personal history of students in their care. This
  information is available in a student's personal file. Any indication of physical or sexual abuse
  from staff towards student will result in an immediate suspension and will be reported to DCFS for
  investigation.
- Contact with students who have graduated or aged-out of the program should be limited. Under no circumstances should contact be initiated by the staff unless it is through authorized follow-up contact.
- Staff are to address students by their names. Nicknames are not appropriate.
- Discussions of confidential material or information should occur in administrative offices/conference rooms, and not within earshot of any students.
- Any perceived or observed inappropriate contact or relationships between another staff member and a student should be reported immediately to a supervisor or Human Resources.



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Approved By: Administration	Policy Number: SE-PPSS02	

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Policy Name: Working with Students in a Therapeutic Day School		
Originate Date: Revised Date: 06/21/2023		
Approved By: Administration Policy Number: SE-PPWST08		

## **Build a Therapeutic Relationship**

The students served in a therapeutic day school setting may come to S.E.A.L. with various educational, emotional and social challenges. It is through the establishment of a trusting and nurturing relationship that you will begin to encourage a student's success and personal growth. Take the time to read each student's file to gain a clear understanding of his/her history, strengths, and weaknesses. Learn the student's likes and dislikes and engage the student in relevant conversations and activities. Build trust with the student by being consistent in your expectations.

#### **Set Limits**

- Setting limits means setting guidelines and standards for appropriate social interactions and behaviors
- Be clear and set limits that are practical and achievable
- Follow up on expectations
- Limit setting offers a student an opportunity to process their actions and decisions
- Limit setting helps staff to enforce consequences (when necessary) as a means of de-escalating defensive behavior
  - Explain the exact type of behavior that is inappropriate
  - Clearly and calmly explain WHY a behavior is inappropriate
  - If necessary, present the student with appropriate and meaningful consequences, and an opportunity to learn accountability
  - Work with your team to best determine ways to process a difficult situation and/or deliver difficult information
  - Allow the student some time to process the situation
  - Always adhere to your limits, and avoid "taking back consequences" or adding in privileges if a student reacts poorly
- Be mindful when setting limits...
  - o Do not use commands or demanding phrases like "Do it now!"
  - Do NOT threaten
  - When implementing a consequence, make sure the student clearly understands why the consequence is being enforced. Do NOT use the phrases like "because I said so." State facts and follow the behavior program.
  - Show respect for the student and the therapeutic process. It is never appropriate to belittle a student or their understanding of a situation.
  - Don't give ultimatums which can lead to power struggles.

### **Avoid Power Struggles**

It is easy to feel defeated by power struggles as we try to manage behavior and avoid conflict. However, avoiding power struggles can allow for a healthy resolution of conflict. Employees are not here to force the students to behave a certain way. The employee's job is to encourage growth and comprehension, so students learn skills to make independent positive decisions. Staff enforce meaningful consequences in order to help students develop an understanding of appropriate social behavior, and to distinguish acting out or defensive behavior.



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- Be consistent with rules and consequences.
- Give choices that you can enforce and that are reasonable (some things will not be open to choice, and you should communicate that).
- Listen to the students and validate their feelings.
- Be able to compromise within your set rules, if needed.
- Recognize the issues or topics that may be personally triggering.
- Be able to reason and avoid verbal altercations by disengaging or walking away when necessary. (Always switch places with another staff member to ensure proper supervision).
- Make sure your expectations are reasonable and within the abilities of the specific student.
- Expectations and consequences must align with the behavior and incentive program put in place by SEAL. Atypical or unique/individual behavior plans must be approved by the coordinator team.

#### **Maintain Professional Boundaries**

- Signs of unhealthy **student** boundaries:
  - Tells personal details, especially in early/first meetings
  - o Takes as much as possible regardless of need
  - Gives as much as he/she can give for the sake of giving
  - Believes others should anticipate his/her needs and actions
  - Exhibits "falling apart" emotional behavior so someone will take care of them
  - Self-abuse
  - Going against personal values or rights to please others
  - Allowing people or peers to take advantage of him/her
  - Food and chemical abuse
  - Sexual and physical abuse
- Signs of unhealthy **staff** boundaries:
  - o Giving your home phone number, address or email to students
  - Giving intimate information about yourself to students
  - Believing that only you can "save" this student(s)
  - o Believing that the "system" doesn't work for this student, so you must intervene
  - Believing that colleagues "don't understand" when you discuss/defend your behavior
  - Lending students money
  - Physical or emotional abuse
  - Taking sides in an argument between students
  - Considering yourself "part of the family" with students
  - Playing "favorites" with a student
  - Maintaining relationships with students that are peer-like



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### Removal From The Milieu (See Policy "Removal from the Milieu" SE-PPRM01)

Occasionally, students may need to be removed from the classroom/group setting as a behavioral intervention. The purpose of this intervention is to give the student space and time away, with the desired outcome being that the student will reintegrate at an appropriate time. Students may be removed from the milieu/group for the following reasons:

- Disruptive Behavior (several minutes or more and after repeated redirection)
- Unsafe Behavior (threatening, destructive to property, throwing things, physical or excessive verbal aggression, etc.)
- Upon request of the student (if it is determined by staff to be necessary/helpful)

#### **De-Escalation**

Staff members should focus on de-escalating situations by using skills learned in the CPI nonviolent crisis intervention training programs:

- Proxemics (proximity) You must be in tune with the student's "nonverbal behavior." When a student feels threatened by your proximity, you increase the possibility of escalating the situation.
- Kinesics (body posture and motion) Your body position can also impact the non-verbal message you send to the student. According to CPI, a face-to-face, shoulder-to-shoulder position is generally perceived as a 'challenge position'. Instead, you should use the CPI "Supportive Stance" to approach escalated students.
- Paraverbal Communication How you say things is as important as what you say. You must be aware of tone, volume, and cadence.

### **Crisis Prevention Intervention**

Nonviolent Crisis Intervention should be used only as a last resort. All S.E.A.L. employees are trained in CPI upon hire, and participate in refresher trainings annually. All employees are expected to review behavior management plans for individual students.

- Under state and federal laws, forms of behavior management that are not included in a student's plan may not be utilized.
- Interventions that are inconsistent with CPI protocol are in violation of state law (refer to 23 Illinois Administrative Code Subtitle A section 1.280)

The employee has reviewed and understands the above policy.		
EMPLOYEE SIGNATURE	DATE	