International Scholars Academy

Anti-Discrimination, Anti-Harassment, Sexual Misconduct, and Child Abuse Reporting Policy

1. Purpose and Policy Statement

International Scholars Academy ("ISA" or "the Academy") is committed to maintaining a safe, respectful, and supportive educational and employment environment free from discrimination, harassment, sexual harassment, sexual misconduct, abuse, and retaliation.

ISA prohibits discrimination or harassment based on an individual's actual or perceived race, color, religion, national origin, ethnicity, ancestry, sex, pregnancy, sexual orientation, gender identity, age, disability, genetic information, or any other status protected by applicable federal, state, or local law.

Retaliation against any person who reports discrimination, harassment, sexual misconduct, or suspected abuse; participates in an investigation; supports another person's report; or exercises rights protected by law or ISA policy is strictly prohibited.

ISA will respond promptly and appropriately to all reports. The Academy will take reasonable steps to protect affected individuals, investigate allegations within its authority, address substantiated misconduct, remedy resulting harm, and prevent recurrence.

Nothing in this policy limits or replaces an employee's independent legal duty to report suspected child abuse or neglect to the appropriate governmental authorities.

2. Scope of the Policy

This policy applies to:

- Students;
- Teachers;
- Administrators;
- Counselors;
- Coaches;
- Substitute teachers;
- Support and office staff;
- Volunteers and chaperones;
- Contractors, consultants, and vendors;
- Parents and visitors while participating in school activities; and

- Any other individual associated with ISA.

The policy applies to conduct occurring:

- On ISA property;
- During the school day;
- On school transportation;
- During athletic events, field trips, extracurricular activities, and school-sponsored programs;
- At off-campus school events;
- Through school technology, email, messaging platforms, social media, or other electronic communications; and
- Away from school when the conduct has a substantial connection to ISA or materially affects the safety, rights, education, or working environment of a member of the ISA community.

3. Definitions

A. Discrimination

Discrimination means treating a person unfavorably, denying an opportunity or benefit, imposing an unfair burden, or interfering with the person's ability to participate in ISA's programs, activities, services, or employment because of the person's membership, or perceived membership, in a protected class.

B. Harassment

Harassment is unwelcome verbal, written, visual, electronic, or physical conduct based on a protected characteristic.

Harassment violates this policy when the conduct is sufficiently severe, persistent, pervasive, or objectively offensive that it interferes with a person's education, employment, participation in an ISA program, or ability to benefit from the school environment. Conduct may also violate ISA standards even when it does not rise to the level of unlawful harassment.

Whether conduct is harassment will be determined by examining the totality of the circumstances, including the nature, frequency, severity, context, location, relationships of the individuals involved, and the ages and developmental levels of any students involved.

C. Sexual Harassment

Sexual harassment is unwelcome conduct of a sexual nature or unwelcome conduct directed at a person because of sex. It may include sexual advances, requests for sexual favors, sexual comments, sexual gestures, sexually explicit communications, or other verbal, visual, electronic, or physical conduct of a sexual nature.

D. Sexual Misconduct

Sexual misconduct includes, but is not limited to:

- Sexual assault or attempted sexual assault;
- Sexual abuse or exploitation;
- Grooming behavior;
- Indecent exposure;
- Voyeurism;
- Sharing or requesting sexual images;
- Sexual communication between an adult and a student;
- Sexual contact with a student;
- Dating or attempting to establish a romantic or sexual relationship with a student;
- Providing special gifts, favors, transportation, or private meetings for an improper purpose;
- Encouraging a student to keep communications, meetings, gifts, or relationships secret; and
- Any other conduct that violates professional boundaries or places a student at risk.

A student cannot consent to sexual conduct with an ISA employee, volunteer, coach, contractor, or other adult acting in a position of trust or authority.

E. Child Abuse and Neglect

Child abuse or neglect includes any act or omission that meets the definition of abuse or neglect under applicable Virginia law. It may include:

- Physical abuse;
- Sexual abuse or exploitation;
- Emotional abuse;
- Neglect or inadequate supervision;
- Abandonment;
- Threatened harm;
- Grooming or exploitation;
- Human trafficking; and
- Other conduct that places a child's health, safety, or well-being at risk.

Employees are not responsible for determining whether abuse has been proven. A report must be made when there is reason to suspect that abuse or neglect may have occurred.

F. Retaliation

Retaliation means taking or threatening an adverse action against a person because the person made a good-faith report, requested assistance, participated in an investigation, provided information, or opposed conduct prohibited by this policy.

Retaliation may include intimidation, threats, discipline, exclusion, reduced opportunities, unfavorable assignments, harassment, pressure to withdraw a report, or adverse academic or employment actions.

4. Professional Boundaries Between Adults and Students

All ISA employees, volunteers, coaches, contractors, and other adults working with students must maintain appropriate professional boundaries.

Adults may not:

- Engage in romantic, sexual, or sexually suggestive conduct with a student;
- Communicate with students through secret, disappearing, or unauthorized personal accounts;
- Request or send photographs of a sexual, intimate, or inappropriate nature;
- Meet privately with a student in an isolated or unobservable location without an authorized educational purpose;
- Transport a student alone in a personal vehicle without authorization, except in a documented emergency;
- Give a student gifts, money, or special privileges for an improper purpose;
- Ask a student to conceal communications, meetings, gifts, or activities;
- Discuss their own sexual relationships or experiences with students;
- Make sexual comments about a student's appearance or body;
- Use their position to establish an inappropriate emotional dependency; or
- Engage in grooming or any conduct that could reasonably be viewed as preparing a student for exploitation or abuse.

Employees must use ISA-approved communication systems and follow all school policies governing electronic communications, transportation, supervision, tutoring, and meetings with students.

5. Duty to Intervene and Report Policy Violations

All employees are responsible for supporting a safe and respectful school environment.

An employee who witnesses discrimination, harassment, sexual harassment, retaliation, inappropriate boundary conduct, or other misconduct must:

1. Take reasonable and safe action to stop or interrupt the conduct when immediate intervention is appropriate;

2. Protect the student or other affected person from further harm;
3. Promptly report the matter to the Principal, Head of School, Human Resources representative, or another designated administrator; and
4. Cooperate fully and honestly with any school or governmental investigation.

Employees must not ignore misconduct because the conduct appears minor, because the affected person has not submitted a formal complaint, or because the employee believes another person will report it.

A report to an ISA administrator does not replace an employee's legal obligation to report suspected child abuse or neglect to Child Protective Services or law enforcement.

6. Mandatory Reporting of Suspected Child Abuse or Neglect

ISA teachers and other school employees are mandated reporters under Virginia law.

Any employee who, in a professional or official capacity, has reason to suspect that a child is being or has been abused or neglected must make an immediate report in accordance with Virginia law.

The employee must not:

- Wait for proof or certainty;
- Conduct an independent investigation;
- Interview multiple witnesses;
- Ask the child to repeat the disclosure unnecessarily;
- Confront the alleged offender;
- Attempt to resolve the matter privately;
- Promise the child complete confidentiality; or
- Delay reporting while waiting for permission from a supervisor.

The employee should listen calmly, avoid leading questions, reassure the child that reporting was the right thing to do, and record the child's exact words and the observable facts as accurately as possible.

Reporting Procedure

An employee with reason to suspect child abuse or neglect must:

1. Immediately report the suspicion to the Virginia Department of Social Services Child Abuse and Neglect Hotline or the appropriate local department of social services, as required by law.
2. Make the report as soon as possible and no later than 24 hours after the employee first has reason to suspect abuse or neglect.
3. Immediately notify the Principal that a report has been made, unless the Principal is the subject of the allegation.

4. If the allegation involves the Principal, Head of School, notify the Board Chair (Director General).
5. Contact law enforcement or emergency services immediately when a child is in imminent danger, urgent medical attention is needed, or the circumstances may involve a criminal offense.
6. Cooperate with Child Protective Services, law enforcement, and other authorized agencies.

An internal report to ISA does not satisfy the employee's legal reporting duty unless the reporting process used fully complies with applicable law and the employee receives confirmation that the report was made to the appropriate governmental authority.

When there is uncertainty about whether the information creates reasonable suspicion, the employee should contact Child Protective Services for guidance rather than deciding not to report.

7. Reports Involving an ISA Employee, Volunteer, or Contractor

Any allegation that an ISA employee, substitute, coach, volunteer, contractor, vendor, or other adult associated with ISA has abused a student, engaged in sexual misconduct, violated professional boundaries, or placed a student at risk must be reported immediately.

ISA may take interim protective measures, including:

- Removing the accused individual from contact with students;
- Placing an employee on administrative leave;
- Changing supervision or reporting arrangements;
- Restricting access to school property or systems;
- Preserving records and electronic communications; and
- Implementing student safety and support measures.

Interim action is not a determination that misconduct occurred. Its purpose is to protect students, preserve the integrity of the investigation, and maintain a safe environment.

ISA will not conduct an internal investigation in a manner that interferes with an investigation by Child Protective Services or law enforcement.

8. Student and Employee Reporting Options

Students, parents, employees, and other members of the ISA community may report discrimination, harassment, sexual misconduct, retaliation, or boundary concerns to:

- The Principal;
- The Head of School;
- A school counselor;

- The Human Resources representative.

Reports may be oral or written. Anonymous reports will be reviewed to the extent reasonably possible, although anonymity may limit ISA's ability to investigate fully.

No person is required to confront the individual accused of misconduct before making a report.

When a report involves suspected child abuse, neglect, exploitation, or a possible crime, individuals may report directly to Child Protective Services, law enforcement, or emergency services.

9. Response and Investigation

ISA will respond promptly to reports and will determine the appropriate process based on the nature of the allegation.

ISA will use a fair and impartial process. All involved individuals are expected to provide truthful information and maintain appropriate confidentiality.

ISA may postpone or limit portions of an internal investigation at the request of Child Protective Services or law enforcement.

10. Confidentiality and Privacy

ISA will protect the privacy of students, employees, reporters, witnesses, and accused individuals to the extent reasonably possible and permitted by law.

ISA cannot promise complete confidentiality because information may need to be disclosed to administrators, parents or guardians, Child Protective Services, law enforcement, legal counsel, insurers, accrediting agencies, or other authorized parties.

Employees must not discuss reports, investigations, or student information with unauthorized persons.

11. Protection Against Retaliation

ISA prohibits retaliation against any person who, in good faith:

- Reports suspected misconduct;
- Reports suspected child abuse or neglect;
- Assists another person in making a report;
- Participates in an investigation;
- Provides information to ISA or a governmental agency; or
- Refuses to participate in conduct prohibited by this policy.

Any suspected retaliation must be reported immediately. Retaliation is a separate violation of this policy and may result in disciplinary action, even when the original allegation is not substantiated.

Knowingly making a deliberately false report may result in disciplinary action. However, a report made in good faith will not result in discipline merely because the allegation is not substantiated.

12. Required Employee and Staff Training

All ISA employees and regular school personnel must complete mandatory training on discrimination prevention, sexual harassment, professional boundaries, child abuse recognition, and mandated reporting.

Training Schedule

Required training must be completed:

1. During new-employee orientation and before an employee is permitted to work independently with students;
2. Annually thereafter, before or near the beginning of each school year;
3. At any additional time directed by ISA administration.

Documentation of Completion

Employees must provide a certificate or other documentation showing successful completion of required training.

Failure to complete mandatory training by the established deadline may result in removal from student-contact duties and disciplinary action, up to and including termination of employment or service.

Completing training does not replace an employee's responsibility to understand and follow this policy and all applicable laws.

13. Corrective and Disciplinary Action

A person who violates this policy may be subject to corrective or disciplinary action appropriate to the circumstances.

ISA may impose discipline for violating professional standards or school policy even when the conduct does not result in criminal charges or a finding by an outside agency.

14. Registered Sex Offenders and Restricted Individuals

ISA will comply with all federal and Virginia laws governing registered sex offenders and access to school property. A registered sex offender or other individual legally restricted from entering school property may not enter or remain on ISA property or participate in school-sponsored activities