



Pennsylvania School Boards Association

CORONAVIRUS

POLICY UPDATE

POLICY 824. MAINTAINING PROFESSIONAL ADULT/STUDENT BOUNDARIES – CONSIDERATIONS FOR A DIGITAL LEARNING ENVIRONMENT

PSBA developed policy guide 824 on Maintaining Professional Adult/Student Boundaries in October 2015 in response to increased incidents of inappropriate adult-student relationships arising in school settings. The policy addresses prohibited conduct related to romantic or sexual relationships, social interactions and electronic communications. The prohibited conduct in the policy addresses a range of behaviors that includes not only obviously unlawful or improper interactions with students, but also grooming and other boundary-blurring behaviors that could lead to more egregious conduct. The policy also establishes guidelines for individuals to report inappropriate or suspicious conduct, and provisions for investigations, discipline and training.

As schools have moved into a digital learning environment due to the closures from the COVID-19 emergency, administrators and staff have had to adjust their roles and practices to provide curriculum and instruction through online platforms, find ways to connect with students in virtual environments, and provide programs and services to students in new ways through web-based or telecommunication devices. Every member of the school community is learning to implement and adhere to existing policies and procedures in different ways, and that includes maintaining positive school climate and appropriate relationships in a different environment. This guide is designed to assist administrators and staff in implementing and complying with the provisions of Policy 824 in a digital learning environment while maintaining professionalism and protecting the well-being of all students and staff. The policy does not require revision based on the current circumstances, but additional explanation or training may be helpful in some areas to ensure both the letter and spirit of the policy provisions are carried out in virtual settings. The following guidance provides examples of language from the policy and considerations for how training and implementation may need to be addressed in the current digital environment.

Under Social Interactions, the following is an example of prohibited conduct that violates professional boundaries:

Exchanging notes, emails or other communications of a personal nature with a student.

Administrators may need to provide examples and clarification on this item in the current virtual learning environment where teachers are struggling to reach out to students and families who are having difficulty engaging with technology and/or meeting basic needs. This should not prevent teachers or staff from asking a student how they are doing, if their basic needs are being met, or checking in on their social-emotional wellness. Administrators should reassure teachers that under the current circumstances this would not be considered inconsistent with what the policy provides:

For adults who are not guidance/counseling staff, psychologists, social workers or other adults with designated responsibilities to counsel students, encouraging students to confide their personal or family problems and/or relationships. If a student initiates such discussions, the student should be referred to the appropriate school resources.

In the current environment where students may not come into regular contact with school staff other than teachers or their fellow students, teachers may be the only school personnel in a position to pick up on signs that a student is in social-emotional distress and may need help specific to such issues. Nonetheless, teachers must not let themselves slip into the role of counselor or social worker helping a student work through the student's personal or family problems and should instead take steps to connect the student to school resources intended for that purpose.

Under *Electronic Communications*, the following language addresses communication devices and platforms:

When available, district-provided email or other district-provided communication devices shall be used when communicating electronically with students. The use of district-provided email or other district-provided communication devices shall be in accordance with district policies and procedures.

Administrators should provide clear direction to teachers and staff, as well as informing parents/families, which district-approved educational platforms will be used for communicating and engaging in digital learning with students. Since this could include several platforms, training should be provided that explains which platforms should be used for specific purposes, how to effectively use the platforms to communicate, and how to maintain confidentiality of student information.

All electronic communications from coaches and advisors to team or club members shall be sent in a single communication to all participating team or club members, except for communications concerning an individual student's medical or academic privacy matters, in which case the communications will be copied to the building principal. In the case of sports teams under the direction of the Athletic Director, such medical or academic communications shall also be copied to the Athletic Director.

If school entities have coaches and advisors currently communicating with students, the school entity should ensure that either the coach/advisor has a district-approved email or other district-approved digital platform to communicate with students that can be monitored, or if they are using personal email, then the building principal or Athletic Director should be copied on individual messages to students.

Adults shall not follow or accept requests for current students to be friends or connections on personal social networking sites and shall not create any networking site for communication with students other than those provided by the district for this purpose, without the prior written approval of the building principal.

Administrators should emphasize that this addresses personal social networking sites and reiterate that district-approved platforms or accounts that can be monitored by the district should be used for connecting with students. Recognizing that everyone feels a stronger need for connection during this challenging time, and teachers and staff will want to connect with students and families, administrators should ensure that all staff are trained on how to maximize the district-approved platforms to set up video meetings, send and receive video and audio messages to and from students, and use tools to provide positive comments or "like" student work that is submitted.

Under the *Exceptions* in the policy, this language addresses emergency situations and justifiable deviation:

An emergency situation or a legitimate educational reason may justify deviation from professional boundaries set out in this policy. The adult shall be prepared to articulate the reason for any deviation from the requirements of this policy and must demonstrate that s/he has maintained an appropriate relationship with the student.

Administrators should clarify that in the current emergency situation, in most cases, appropriate deviations will be related only to rules regarding communication methods and platforms, while adhering to the intent of the policy to conduct oneself in a professional manner at all times in regard to students. Examples could include things such as: communicating with students in the evening, outside of regular school hours, for legitimate educational reasons because that is when they are able to complete work; connecting with a student one-on-one through a video communication platform approved by the district to provide counseling or individualized instruction or services; calling or texting a student to provide technology troubleshooting if they cannot connect to an approved platform. As stated in the policy, staff should always be able to articulate the legitimate reason for the deviation and should be provided with a way to report these situations.

The policy recognizes that many adults are involved in various other roles in the community through nondistrict-related civic, religious, athletic, scouting or other organizations and programs whose participants may include district students. The policy explains:

Such community involvement is commendable, and this policy is not intended to interfere with or restrict an adult's ability to serve in those roles; however, adults are strongly encouraged to maintain professional boundaries appropriate to the nature of the activity with regard to all youth with whom they interact in the course of their community involvement.

Administrators should recognize that in the current situation, all activities are digital, and staff who serve in these roles in other community activities may need to connect with participants through social media and other platforms that are not controlled by the district. Staff should be reminded of the importance of maintaining professionalism in all connections involving district students and encouraged to use group communications.

In the section on *Reporting Inappropriate or Suspicious Conduct*, the following language addresses notification of administration:

Any person, including a student, who has concerns about or is uncomfortable with a relationship or interaction between an adult and a student, shall immediately notify the Superintendent, principal or other administrator.

The district should ensure that mechanisms are in place for students, staff and families to submit these concerns digitally, in addition to reports of discrimination, harassment, bullying, hazing and other concerns in accordance with the reporting procedures in Board policy. Administrators should be trained on how to effectively receive and communicate reports, conduct investigations, take appropriate action and maintain documentation while working remotely.

Under *Investigations*, this language addresses promptly investigating the allegations:

Allegations of inappropriate conduct shall be promptly investigated in accordance with the procedures utilized for complaints of harassment.

Administrators should receive training on how to conduct an investigation remotely, which IT staff will be able to access and assist in gathering data, how to keep information confidential, when to coordinate with the Superintendent and/or solicitor, and how to submit reports. Most importantly, in addition to investigating, administrators should take all steps available to ensure that any harassment or inappropriate conduct is addressed immediately.

In addition to the provisions of this policy, the following additional Board policies should be considered and discussed when training employees on maintaining professional boundaries and other responsibilities while working in a digital learning environment:

- 113.4/216 – maintaining confidentiality of student personal information and images.
- 112/146/236 – connecting students with guidance counseling, Student Assistance Program and other appropriate student services and supports.
- 317/317.1 – reminder on prohibition of profane/abusive language and reporting arrests/convictions and educator misconduct provisions.
- 325 – maintaining appropriate, professional appearance during video connections with students.
- 340 – reporting unsafe conditions, including cybersecurity issues and security settings on educational platforms, in order to keep students safe. Monitoring student behavior in online meetings.
- 806 – complying with mandated reporter requirements for incidents of suspected child abuse.
- 814 – avoiding copyright violations in online learning.
- 815 – acceptable use provisions and educating students on appropriate use and etiquette.
- 819 – maintaining awareness and reporting of students exhibiting risk factors or warning signs associated with suicide.