

School of the Greats™ and École des Grands® Student Protection Policy for Ontario

PREAMBLE

Whereas the Fondation W. (the **Foundation**) engages with various post-secondary institutions to run its extracurricular homework assistance and science awareness program, entitled School of the Greats™/École des Grands® (the **Program**);

AND WHEREAS the Fondation wishes to ensure a uniform code of conduct that promotes the safety and well-being of all participants in the Program under the age of 18 (the **Participants**), in accordance with the relevant child protection legislation;

NOW, THEREFORE, the Foundation has established a Student Protection Policy (hereafter the “**Code of Conduct**” or the “**Code**”) to be implemented by the Participating University, as defined below;

SECTION 1: DEFINITIONS

The following definitions shall apply to this Agreement:

- a. **Act:** *The Child, Youth, and Family Services Act* 2017, S.O. 2017, c. 14, and all applicable regulations.
- b. **Employee:** an individual paid by the Participating University, and who is present on Saturdays during the Program to assist in any capacity. This designation excludes the Project Manager.
- c. **Complaint:** a written or verbal statement to the Designated Person, as defined below, to report a situation of abuse or mistreatment of a Participant, or Participants, in the Program.
- d. **Collaborator** shall include: any director of the Participating University, as defined below, Project Managers, Mentors, and volunteers, employees, agents, and any other party present during the Program.
- e. **Designated Person:** An employee of the Participating University, other than the Project Manager, who is responsible for receiving a Complaint.
- f. **Mentor:** Any student of the Participating University who participates in the Program as a mentor.
- g. **Participant:** Any person below the age of 18 and who participates in the Program as a mentee.
- h. **Participating University:** Any university that has signed an agreement (also known as the “**Licence**”) with the Foundation for implementation of the Program, and to whom this Code of Conduct applies. For clarity, the term Licensee also refers to the Participating University.
- i. **Premises:** Any location where the Program is occurring including, but not limited to, classrooms and laboratories used for the Program at the Participating University, the grounds of the Participating University, the site of embarking or disembarking from the school bus, transportation to and/or from the Participating University.

- j. **Project Manager** is the individual appointed by the Participating University and whose task is to be present on Saturdays at the university to implement the Program. For clarity, if the implementation is shared among several individuals (e.g., one person who is present on Saturdays and another who is not), the Project Manager refers to the person who is present on Saturdays with the Participants to carry out the activities of the Program.
- k. **Volunteer** is an individual who assists with the Program, and who is present on Saturdays, but who does not receive monetary compensation from the Participating University.

SECTION 2 OBJECTIVES

Through this Code of Conduct, the Foundation wishes to:

- Ensure that all instances of mistreatment and/or abuse against Participants are properly addressed;
- Provide preventive measures (see Section 3);
- Provide a Code of University parties (see Section 4);
- Define the Roles and Responsibilities of parties involved (see Section 5);
- Provide a complaint management protocol (see Section 6); and
- Provide an intervention protocol (see section 7).

SECTION 3 PREVENTIVE MEASURES

The Foundation requires the Participating University to undertake certain preventative measures in order to ensure the health, safety, and well-being of the Participants.

3.1 Vulnerable Sector Check

- 3.1.1** Participating Universities are expected to ensure that all Employees, Mentors, Project Managers, and Volunteers have completed a vulnerable sector check (the **VSC**). In the event that the VSC reveals any criminal record, the Participating University is expected to take such steps as may be appropriate to minimize any risk to the Program Participant, including :
- a. Terminating the Mentor, Employee, Project Manager, or Volunteer's participation in the Program ;
 - b. Require the party in question to participate in specialized training ; or
 - c. Such other steps as the Participating University or the Foundation deem necessary.
- 3.1.2** All visitors to the Program are expected to complete a VSC in order to travel independently around the Premises. Visitors who have not completed a VSC shall be expected to be accompanied to the Premises.

3.2 Security on the Premises

- 3.2.1** As a best practice related to Student safety in the event of an active shooter: the Licensee's security guards must ensure that the classrooms and laboratory used for the Program are locked from the outside at the beginning of the activities and throughout the duration of the activities so that no one (active shooter) can enter the premises if the door is closed and the activities are in progress. If the doors to the rooms being used have windows, these windows must be completely sealed with a large card indicating the level of Participants present in each classroom (e.g., Elementary 1, Elementary 2, etc.) for the duration of the activities so that a suspicious individual cannot see the activities taking place inside the classrooms or see that they contain Participants.
- 3.2.2** An evacuation protocol must be defined between the Licensee and the Project Manager. This protocol must be communicated to the Mentors during their training.
- 3.2.3** The details of the safety rules applicable to the Program's activities can be found in School of the Greats / École des Grands implementation guide provided to the Licensee as mentioned in Section 7 of this Policy.

3.3 Attendance at the Premises

- 3.3.1** The Project Manager shall request any person who attends at the Premises, and who is not engaged in the Program, to leave.

3.3.2 If, for any reason, the parent of a Participant needs to pick up his or her child at the Participating University, the Parent shall wait for his or her child in front of the Participating University's security area .

3.4 Mandatory Training Activity

3.4.1 The Foundation provides mandatory training for the Project Manager and a curriculum for the mandatory training of Mentors. These trainings are designed to explain this Code of Conduct, to develop knowledge about abuse and mistreatment of Participants, about how to behave in case of disclosure or suspicion, and about the roles and responsibilities of the Participating University.

3.5 Rules of Conduct for persons in the presence of Participants

Ways to behave with Participants during School of the Greats™ / École des Grands' activities to avoid being unfairly suspected of abuse or mistreatment.

- Trying to be in plain view of others to talk to a Participant or to physically show encouragement and affection.
- Touching the Participant's back, head, shoulders or squeezing them by wrapping their arm around their shoulders, on their side, giving them a high-five; listening to what the Participant is expressing and respecting their comfort level and limits.
- Ensure that two Mentors or one Mentor and one Project Manager are present in the sanitary areas or, if this is not possible, provide visual access to these areas.
- Report to the Project Manager the results of any private intervention with a Participant that relates to this Code.
- Never force a Participant to undress, respect the modesty of each Participant.
- Prohibit any electronic or social networking communication between Mentors and Participants.
- Prohibit taking photos or videos of Participants without prior parental consent received by the Project Manager.

SECTION 4 CONDUCT OF UNIVERSITY PARTIES

4.1 The Participating University is expected to ensure that Collaborators engage appropriately with Participants. This includes, but is not limited to, the terms specified in the *Act*, including:

- Respectful engagement;
- Avoidance of corporal punishment, or any mechanical or physical restraint;
- Avoidance of physical detention;
- No committing of illegal acts.
- Avoiding photographs of any Participant without prior parental consent.

SECTION 5: ROLES AND RESPONSIBILITIES OF PARTIES INVOLVED

5.1 Participating University

5.1.1 The Participating University shall identify a Designated Person to receive complaints related to the Program and ensure that Participants are being treated in accordance with this Code and the rules and policies of the Participating University, and to ensure no violation of the *Act*.

5.1.2 The Participating University shall adequately support the Project Manager and the Designated Person in the application of this Code.

5.1.3 In collaboration with the Project Manager and the Designated Person, the Participating University shall ensure the semestrial reporting required by this Code: signing the attestation confirming that it has processed all Complaints related to this Code of conduct. The semestrial reporting can be found in the School of the Greats/École des Grands' implementation guide provided to the Participating University.

5.1.4 The Participating University assumes all responsibilities related to the implementation and operation of the Program and the implementation of this Code of conduct.

5.2 The Designated Person

5.2.1 The Designated Person shall receive Complaints and apply the Complaint Management Protocol, as set out in Section 6 of this Code. Complaints are managed by applying this Code in conjunction with the rules and policies in effect at the Participating University.

5.2.2 The Designated Person shall provide Participants, their parents or Third Parties with information on the procedures for handling Complaints specific to this Code and the university's rules and policies.

5.2.3 The Designated Person shall ensure that the Project Manager puts in place measures to ensure the safety of the Participant and to protect him/her from retaliation or threats of retaliation during the Program. If the Project Manager is implicated, the Designated Person puts in place safety measures him/herself.

5.2.4 The Designated Person shall communicate with the Participating University to deploy university regulations and policy as necessary in correspondence with the response and Complaint Management Protocol of this Policy.

5.3 University Project Manager

5.3.1 Throughout the duration of the Program, the Project Manager shall be responsible for the implementation of this Code of conduct.

5.3.2 The Project Manager shall inform Collaborators of this Code as required, and shall advise of the psychosocial and health resources available at the university and/or to specialized resources outside the university.

5.3.4 The Project Manager shall implement accommodation and safety measures within the framework of the Program to ensure the safety of the individuals concerned and to protect them from reprisals or threats of reprisals in the event of a Report and/or Complaint.

5.3.5 The Project Manager shall report to Children's Aid Society any case arising from any of the acts specified in Appendix 2a using the Form provided as Appendix 2b.

5.3.6 The Project Manager shall report any Complaint or Report received against a person in connection with the Program to the Designated Person.

5.3.7 The Project Manager shall send a weekly report to the Elementary or Secondary school principal participating in the Program.

5.4 Elementary or Secondary school principal participating in the Program

5.4.1 The school shall communicate and collaborate closely with the Project Manager and the Designated Person

5.4.2 The school shall review the weekly report of the Project Manager

5.4.3 The school, following receipt of the report, shall carry out the necessary follow-ups and put in place the resources she deems necessary for the Participant and his/her family.

SECTION 6 COMPLAINTS MANAGEMENT PROTOCOL

6.1 Complaints are to be made to the Designated Person. Where possible, complaints should be made in writing and should specify the date, time, and what occurred, as well as who was present. The Designated Person will respect the confidentiality of any information raised in the course of resolving a dispute raised by a Participant, Parent, or Third Party, unless the nature of the Complaint is such that the law states that confidentiality can be overridden (for instance, in the case of a duty to report). Further, if the resolution of the dispute or the processing of the Complaint requires the disclosure of certain details identifying the parent, Student or Third Party who made the request, only those persons who need to know such information in order to cooperate or provide their version of the facts will have access to it.

6.2 In the event that a complainant makes a verbal complaint, the Designated Person shall transcribe the complaint and ask the complainant to verify the information as transcribed.

6.3 Upon receipt of a complaint, the Designated Person shall determine if there is a party at risk of imminent harm. If there is a risk of imminent harm. The Designated Person shall:

- a. meet with the Project Manager to identify interim measures to ensure the safety of the Participant, and to protect the Participant from retaliation or threat of retaliation;
- b. Liaise with the Project Manager to implement the interim measures;
- c. Notify the Participating University;

- d. Identify such authorities as may be necessary to ensure the protection of Participants, including, but not limited to, the participant's school, parents, and/or Children's Aid Society.
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- 6.4 If the Designated Person has reasonable grounds to believe that a Participant is being subject to any of the behaviors set out in Appendix 2a the Designated Person shall complete the Form attached to the Code as Appendix 2b, and immediately report the matter to the Children's Aid Society . The Designated Person may also engage in an Intervention that is appropriate, as set out in Section 7 of this Code.
 - 6.5 Where necessary, the Designated Person shall conduct a reasonable investigation into the Complaint. This may include conducting interviews, gathering documents, and/or clarifying the accounts of parties who were involved in the Complaint (the **Investigation**). The Investigation may include recommendations, by the Designated Person, about how to address the issue. This may include, for instance, removing a Participant from the Program, or implementing disciplinary action.
 - 6.6 Once the Investigation is complete, the Designated Person will meet with the Project Manager (if this person is not involved) to identify measures that may be required to ensure the safety of the persons involved and protect them from reprisals or threats of reprisal. The Designated Person and Project Manager may decide to meet with university management, if necessary.
 - 6.7 In all cases, the complainant and the parties named in the complaint shall be informed of the outcome of the Investigation, and any measures to be put into place.

SECTION 7 INTERVENTION PROTOCOL

7.1 Imminent Harm

Where a Participant at the Premises is at risk of imminent harm, the Project Manager shall:

- Implement temporary safety measures to ensure the immediate safety of the Participant.
- Report the situation to the Designated Person;
- Contact the Children's Aid Society and/or 911, as necessary;
- Notify the School;
- Contact the parents; and/or
- Report any Reports made to the Designated Person so that he/she may contact the university administration to deploy university regulations and policies if necessary.

For clarity, imminent harm shall include situations of physical violence or sexual abuse. All of the above measures may be implemented as interim measures, while an Investigation is underway.

7.2 Potential Harm

Where a Mentor, Project Manager, Employee or Volunteer believes that there may be a situation of violence or harm facing any Participant at the Premises, the Project Manager shall:

- Immediately separate the party causing harm, or allegedly causing harm, from the Participant;
- Report the situation to the Designated Person;
- Notify the School;
- Contact the parents; and/or
- Implement such other temporary safety measures as may be necessary to ensure the immediate safety of the Participant.

For clarity, all of the above measures may be implemented as interim measures while an Investigation is underway.

7.3 Supports

In all cases, supports shall be offered to the Participants, as well as any other parties, as necessary. This may include:

- Providing support to the witnessing Participants
- Identifying strategies to ensure prevention and safety;
- Offering guidance around by-stander empowerment and social skill development.

7.4 Bullying and Intimidation

In some cases, including certain cases of bullying and intimidation, a long-term strategy may be necessary to ensure the well-being of the parties involved. In addition to immediate intervention, if it is necessary, the Project Manager might adopt one or more of the following measures:

- Meeting separately with the parties involved (witnesses, victims, perpetrators) to document the situation: nature of the event, its severity and the people involved;
- Assess the circumstances: accidental or deliberate and motivated by what emotion (e.g., pleasure, fear, anger, attention seeking, power, revenge, peer pressure);
- Identify with the Participants strategies for ending the situation (e.g., anger management, social skills development);
- Determine with the Participants commitments to be made;
- Intensify prevention and safety strategies as needed;
- Teach expected behaviours (find an acceptable response to needs);
- Reinforce progress ;
- Meet with the Participant's parents to advise of what occurred and/or co-develop strategies;
- Inform the school so that it can put the necessary resources around the Participants involved.

7.5 Violence

In cases in which Participants engage in serious acts of violence, or fail to correct behavioral issues identified to be a problem by the Project Manager, the offending party may be expelled from the Program.

SECTION 8: NON-COMPLIANCE WITH THIS CODE

To the extent to which the Participating University fails to follow this Code, the Foundation may withdraw the License of the School of the Greats™/École des Grands.

SECTION 9 ADDITIONAL TERMS

The university and its authorized representatives are responsible for the application of this Code. The Code will be reviewed at least once every five years. Appendices will be revised as required.

SECTION 10 ACCOUNTABILITY

The Participating University shall sign an semestrial attestation confirming that it has handled all complaints related to the protection of Participants according to this Code. The semestrial attestation can be found in the implementation guide provided to the Participating University.

Appendix 1: Contact Information for Designated Persons
Appendix 2a: Duty to Report
Appendix 2b: Checklist for Processing a Report

APPENDIX 1 - CONTACT INFORMATION FOR DESIGNATED PERSONS

The Designated Person responsible for the management of Complaints

_____ (name of the person designated by the university)

Telephone number

Email:

Office:

APPENDIX 2a- CONCERNS GIVING RISE TO A DUTY TO REPORT

1. Duty to report child in need of protection

Source: The Child, Youth, and Family Services Act 2017, S.O. 2017, c. 14

125 (1) Despite the provisions of any other Act, if a person, including a person who performs professional or official duties with respect to children, has reasonable grounds to suspect one of the following, the person shall immediately report the suspicion and the information on which it is based to a society:

1. The child has suffered physical harm inflicted by the person having charge of the child or caused by or resulting from that person's,
 - i. failure to adequately care for, provide for, supervise or protect the child, or
 - ii. pattern of neglect in caring for, providing for, supervising or protecting the child.
2. There is a risk that the child is likely to suffer physical harm inflicted by the person having charge of the child or caused by or resulting from that person's,
 - i. failure to adequately care for, provide for, supervise or protect the child, or
 - ii. pattern of neglect in caring for, providing for, supervising or protecting the child.
3. The child has been sexually abused or sexually exploited by the person having charge of the child or by another person where the person having charge of the child knows or should know of the possibility of sexual abuse or sexual exploitation and fails to protect the child.
4. There is a risk that the child is likely to be sexually abused or sexually exploited as described in paragraph 3.
 - 4.1 The child has been sexually exploited as a result of being subjected to child sex trafficking.
 - 4.2 There is a risk that the child is likely to be sexually exploited as a result of being subjected to child sex trafficking.
5. The child requires treatment to cure, prevent or alleviate physical harm or suffering and the child's parent or the person having charge of the child does not provide the treatment or access to the treatment, or, where the child is incapable of consenting to the treatment under the *Health Care Consent Act, 1996*, refuses or is unavailable or unable to consent to, the treatment on the child's behalf.
6. The child has suffered emotional harm, demonstrated by serious,
 - i. anxiety,
 - ii. depression,

- iii. withdrawal,
- iv. self-destructive or aggressive behaviour, or
- v. delayed development,

and there are reasonable grounds to believe that the emotional harm suffered by the child results from the actions, failure to act or pattern of neglect on the part of the child's parent or the person having charge of the child.

7. The child has suffered emotional harm of the kind described in subparagraph 6 i, ii, iii, iv or v and the child's parent or the person having charge of the child does not provide services or treatment or access to services or treatment, or, where the child is incapable of consenting to treatment under the *Health Care Consent Act, 1996*, refuses or is unavailable or unable to consent to, treatment to remedy or alleviate the harm.
8. There is a risk that the child is likely to suffer emotional harm of the kind described in subparagraph 6 i, ii, iii, iv or v resulting from the actions, failure to act or pattern of neglect on the part of the child's parent or the person having charge of the child.
9. There is a risk that the child is likely to suffer emotional harm of the kind described in subparagraph 6 i, ii, iii, iv or v and the child's parent or the person having charge of the child does not provide services or treatment or access to services or treatment, or, where the child is incapable of consenting to treatment under the *Health Care Consent Act, 1996*, refuses or is unavailable or unable to consent to, treatment to prevent the harm.
10. The child suffers from a mental, emotional or developmental condition that, if not remedied, could seriously impair the child's development and the child's parent or the person having charge of the child does not provide the treatment or access to the treatment, or where the child is incapable of consenting to the treatment under the *Health Care Consent Act, 1996*, refuses or is unavailable or unable to consent to, treatment to remedy or alleviate the condition.
11. The child's parent has died or is unavailable to exercise the rights of custody over the child and has not made adequate provision for the child's care and custody, or the child is in a residential placement and the parent refuses or is unable or unwilling to resume the child's care and custody.
12. The child is younger than 12 and has killed or seriously injured another person or caused serious damage to another person's property, services or treatment are necessary to prevent a recurrence and the child's parent or the person having charge of the child does not provide services or treatment or access to services or treatment, or, where the child is incapable of consenting to treatment under the *Health Care Consent Act, 1996*, refuses or is unavailable or unable to consent to treatment.
13. The child is younger than 12 and has on more than one occasion injured another person or caused loss or damage to another person's property, with the encouragement of the person having charge of the child or because of that person's failure or inability to supervise the child adequately. 2017, c. 14, Sched. 1, s. 125 (1); 2020, c. 25, Sched. 1, s. 26 (6); 2021, c. 21, Sched. 3, s. 3.

APPENDIX 2b - CHECKLIST FOR PROCESSING AN ALERT (FOR INFORMATION PURPOSES²)

Student's contact information

- Child's name :
- Child's age:
- Address:
- Phone number:
- Father's Name:
- Mother's Name:
- Name of school the Student attends:
- Are there other children involved in the situation?
- If so, what are their names and ages?

Identification of worrying facts

- What are the child's confidences?
- What are the actions or attitudes that worry the child or respondent:
- What are the injuries or marks observed on the child?

Characteristics of the disturbing facts

- How common are the facts?
- Are the events current or past?
- Have the reported events been occurring for a long time?
- What are the dangers for the child?
- Have you witnessed the events?

In cases of sexual or physical abuse only

- Do you know who the alleged abuser is (parent, sibling, other adult, other minor)?
- What is the alleged abuser's name and age?
- Is the child still in contact with this person?

- Have the police been notified?

² Guide « Faire un signalement au DPJ, c'est déjà protéger un Enfant. Quand et comment signaler? Loi sur la protection de la jeunesse, Gouvernement du Québec, 2020.