

#### Standards of Ethical Conduct

Hadar South Florida High School for Girls is dedicated to doing our best to maintain good working conditions, competitive wages and benefits, open communication and employee involvement. Our reputation is a direct result of the loyalty, commitment and continued efforts of our employees.

#### 1. If You Have a Problem

If there is something about your job that is bothering you, please consult the appropriate administrator.

Our "Problem-Solving Procedure" offers all employees the freedom to discuss anything they wish with their supervisors. Whenever you have a problem, it can usually be resolved by following these steps:

- Any concern should first be discussed with your immediate supervisor. Very often, your supervisor is in the best position to handle your problem satisfactorily.
- If your supervisor cannot solve the problem or if you are not satisfied after this step, you should request to speak to the Head of School or the Judaic Studies Principal (regarding academic issues) or the Administrative Assistant (regarding non-academic issues).

### 2. Equal Employment Opportunity

We are committed to providing equal opportunity in all of our employment practices, including selection, hiring, promotion, transfer and compensation, to all qualified applicants and employees without regard to age, race, color, sex, national origin, citizenship status, marital status, religion, disability/handicap or any other protected status in accordance with the requirements of all federal, state, and local laws.

#### 3. Training

All faculty and administrators are required to complete regular training on all stated standards of ethical conduct.

## 4. No Harassment Policy

We do not and will not tolerate unlawful harassment of our employees or students. The term "harassment" includes, but is not limited to, slurs, jokes and other verbal, graphic or physical conduct relating to an individual's race, color, sex, religion, national origin, citizenship, age, sexual orientation or disability. "Harassment" also includes sexual advances, requests for sexual favors, offensive touching and other verbal, graphic or physical conduct of a sexual nature. Violation of this policy will subject an employee to disciplinary action up to, and including, immediate discharge.

If you feel that you are being harassed in any way by a coworker, parent or employee of a customer or vendor, you should notify one of the individuals designated below immediately. In addition, if you believe that a student is being harassed in any way by an employee, parent, fellow student or employee of a customer or vendor, you should notify one of the individuals designated below immediately. Any such matter will be thoroughly investigated and, where appropriate, disciplinary action will be taken.

You should also be aware that no supervisor or other member of our administrative team is authorized to make any employment decision based in any way on an employee's submission to or rejection of sexual conduct or advances. No supervisor or other member of our administrative team has the authority to suggest to any employee that the employee's continued employment or future advancement will be affected in any way because the employee enters into or refuses to enter into any form of sexual or other personal relationship with the supervisor or member of our administrative team. No supervisor or member of our administrative team may coerce an employee into a sexual relationship and then reward the employee. No supervisor may take disciplinary action against an employee or deny a promotion, transfer, award, etc. to an employee because he or she has rejected sexual advances.

In addition, no faculty member or other employee is authorized to make any academic or disciplinary decision based in any way on a student's submission to or rejection of sexual conduct or advances. No faculty member or other employee has the authority to suggest to any student that the student's continued attendance, grades or future advancement will be affected in any way because the student enters into or refuses to enter into a form of sexual or other personal relationship with the faculty member or other employee.

If you believe that a supervisor, member of our administrative team, employee, parent, customer or vendor has acted inconsistently with this policy, please immediately contact the Head of School. You will not be penalized in any way for making a good faith report of improper conduct. If you believe that you have been or are being penalized or retaliated against for making a good faith complaint of harassment, please immediately notify the Head of School. Please do not assume that the School is aware of your problem. Please bring your complaints and concerns to our attention so that we can try and help resolve them.

## 5. Child Abuse Reporting Obligations

The school has a legal responsibility to protect its students. Florida statutes require that all school personnel report situations involving potential child abuse, neglect or abandonment. The statute contains these definitions:

<u>Abuse</u>: any willful act or threatened act that results in any physical, mental or sexual injury or harm that causes or is likely to cause the child's physical, mental or emotional health to be significantly impaired. Signs include: bruises, welts, cuts, broken bones or burns, trouble walking or sitting. Child may be depressed, withdrawn or refrain from any physical contact.

**Neglect:** when a child is deprived of, or is allowed to be deprived of, necessary food, clothing, shelter or medical treatment or a child is permitted to live in an environment when such deprivation or environment causes the child's physical, mental or emotional health to be significantly impaired or to be in danger of being significantly impaired. Child may frequently be tired, hungry or needy for adult attention. Child may have poor hygiene and appear underweight.

<u>Abandonment</u>: a situation in which the parent or legal custodian of a child, or in the absence of a parent or legal custodian, the caregiver responsible for the child's welfare, while being able, makes no provision for the child's support and makes no effort to communicate with the child, which situation is sufficient to evince a willful rejection of parental obligations.

All employees and administrators have an obligation to report misconduct by instructional personnel and school administrators which affects the health, safety, or welfare of a student. Examples of misconduct include obscene language, drug and alcohol use, disparaging comments, prejudice or bigotry, sexual innuendo, cheating or testing violations, physical aggression, and accepting or offering favors. Reports of misconduct of employees should be made to the Head of School, Rabbi Moshe Schochet or Judaic Studies Principal, Mrs. Michal Schochet. Reports of misconduct committed by administrators should be made to Board President, Mr. Donny Cohen.

Allegations of misconduct by Florida certified educators will be reported to the Office of Professional Practices Services. Policies and procedures for reporting misconduct by instructional personnel or school administrators which affects the health, safety, or welfare of a student are posted in Faculty Room 208.

All employees have a duty to report all actual or suspected cases of child abuse, abandonment, or neglect. <u>Call 1-800-96-ABUSE or report online at: http://www.dcf.state.fl.us/abuse/report/.</u>

Any person, official, or institution participating in good faith in any act authorized or required by law, or reporting in good faith any instance of child abuse, abandonment, or neglect to the department or any law enforcement agency, shall be immune from any civil or criminal liability which might otherwise result by reason of such action. (F.S. 39.203)

<u>Employer immunity from liability:</u> An employer who discloses information about a former or current employee to a prospective employer of the former or current employee upon request of the prospective employer or of the former or current employee is immune from civil liability for such disclosure or its consequences unless it is shown by clear and convincing evidence that the information disclosed by the former or current employer was knowingly false or violated any civil right of the former or current employee protected under chapter 760 (F.S. 768.095).

# 6. Communication and Computer System Security and Use

### **Confidentiality and Acceptable Use**

The School's computer systems are intended for school use only. Use of the School's systems for accessing or acquiring information and materials inappropriate to a school environment is against school policy and is prohibited. All information transmitted or stored in school systems (e.g., employee lists, student lists, documents relating to policies and procedures) is the sole and exclusive property of the School and should be treated as confidential. Such information may not be disclosed to any person outside of the School nor may any such information be removed from our premises without the express permission of the Head of School. Employees are strictly prohibited from accessing, reading and copying data or information stored in the systems and from accessing, reading and copying communications not directed to them without prior authorization.

## Management's Right to Access Information

Our computer, telephone and communication hardware and software systems have been installed and are used to facilitate school communications. Although each employee has an individual password to access these systems, they belong to the School, and the contents of all communications are accessible by management for any business purpose. The School reserves the right to monitor, and will periodically monitor, its systems in order to ensure compliance with this policy. Employees are strictly prohibited from placing personal passwords on any School system for the purpose of preventing such monitoring. Employees should not consider any materials transmitted or stored in school systems private.

#### **General and Personal Use**

Because personal communications can be accessed without prior notice, employees should not use school systems to transmit any messages or to access any information which you would not want a third party to see. Although incidental and occasional personal use of our systems is permitted, any such personal use will be treated the same as all other communications under this policy.

#### **Telephone Use**

The telephone system (including voice mail) at the School are the property of the School and are provided for business or school purposes. The School may periodically monitor the usage of the telephone system to ensure compliance with this policy.

#### **Personal Mail**

All mail that is delivered to the School is presumed to be related to school business. Mail sent to you at the School may be opened by office personnel and routed to your department.

#### Other

Under certain circumstances, the School retains the right to photograph, audiotape or videotape a class.

#### **Forbidden Use and Content of Communications**

You may not use our systems in any way that may be seen as insulting, disruptive, offensive or harmful to morale. Examples of prohibited, non-business purposes include, but are not limited to, use of the School's systems:

- To convey insensitive, improper, derogatory, insulting, threatening or harassing language or remarks or sexually-explicit messages, cartoons, jokes or other potentially offensive material
- To send propositions, love letters or any other message that could be construed to be harassment or disparagement of others in violation of our policy against harassment
- To attempt to break into any computer, whether internal or external to the School, to copy or steal electronic files without permission or to knowingly cause or aid the spread of computer viruses
- For the unauthorized advertisement of services
- To run computer games or other personal software during working hours
- As a forum for personal gain

### E-mail, Chat Rooms, Instant Messaging and Social Networking Sites

Electronic communication cannot be used to harass or threaten others. The School reserves the right to randomly check e-mail. E-mail messages must not include personal attacks and should follow the normal rules of appropriate public language. They should not contain any language or content that the author would not be willing to share from the podium at a School meeting. All e-mails sent from staff to parents and students should be sent from staff e-mail accounts only. Any person who believes that they have been harassed or threatened by any of these methods of communication should immediately report the concern in accordance with the School's No Harassment policy.

The School expects all employees to be role models for our students and represent the School in a professional and appropriate way, both on and off campus. Photos or comments that contain references to sexual activity, drugs, drinking, partying or other similar issues which are posted on any social networking or other Internet site that may be accessible to the public or our students are inappropriate and could lead to disciplinary action, up to and including termination of employment. Employees also should not be posting photos of any students, information

about the School, the School's logo, or discussing school relationships on any Internet site, including social networking sites.

The School may periodically check such sites and may determine that off-campus behavior violates the School conduct code.

### Password and Encryption Key Security and Integrity

All systems password and encryption keys must be available to the School at all times. Additionally, you may not use passwords that are unknown to your manager, nor may you install encryption programs without first turning over encryption keys to your manager. Further, employees are prohibited from the unauthorized use of passwords and encryption keys belonging to other employees in order to gain access to other employees' messages. You will be held responsible for all activity occurring under your password.

# Software, Personal Files and Networking

Computer software, whether purchased, developed or modified by the School, may not be downloaded, copied, reproduced, altered, deleted or appropriated by employees without prior School authorization. Any such computer software is the property of the School and may not be copied or appropriated by employees for personal use during employment with the School or upon separation. Employees should be aware that the illegal duplication of computer software may result in the filing of criminal copyright charges by the owners of the copyrights; copyright infringement is punishable by fines and/or imprisonment.

Faculty members who utilize iPads (and other electronic devices) that are owned by the School are responsible for their condition and safe return.

The School does not condone the use of "bootleg" or "pirate" software on its computer system. The use of such software is grounds for discipline, up to and including immediate termination. Any employee who becomes aware of the presence of any "bootleg" or "pirate" software on the School's computer system should notify management immediately.

The use of personal software in the School's computer system without prior authorization is strictly prohibited.

Violations of any aspect of the school's communication and computer systems security and usage policy may result in discipline, up to and including immediate discharge. The School will also seek civil damages against any employee who appropriates or copies the School's property as described in this policy.

# 7. Confidentiality

Confidentiality needs to be preserved as it relates to the individual student and their families. Discretion should be used at all times. All written and oral reports about children are

confidential. If you wish to privately discuss a child with another teacher, this is acceptable. Gossip of any kind is destructive and should not take place at our school. All discussion should take place in a private setting.

### 8. Courtesy

Courtesy is the responsibility of every employee. Everyone is expected to be courteous, polite and friendly to our students, parents and fellow employees. No one should be disrespectful to a student, parent, employee or colleague, use profanity or engage in any activity that injures the image or reputation of our school.

# 9. Criminal Background Checks

All employees are subject to the criminal background process through the VECHS program of the Florida Department of Law Enforcement. The School will perform criminal background checks (including fingerprinting) on all new employees at the time of hire. For existing employees, the School will periodically update the criminal background check. The School will determine, at its discretion, whether the employee's background makes him/her fit for employment or continued employment. All employees must report any arrests or changes to their criminal background to the Head of School within two days of the occurrence. Failure to do so may result in termination.

## 10. Damage to Property

We have made a tremendous investment in our facilities and equipment in order to better serve the educational needs of our students and to make your job easier. Deliberate or careless damage to the School's property will not be tolerated.

# 11. Drug and Alcohol Policy

We will not tolerate alcohol abuse or the use of other intoxicants and mind-altering substances, including illegal drugs. Our employees may be required to submit to drug screens, blood alcohol tests, breathalyzer tests and medical examinations under the following circumstances:

- when an employee is suspected of working or reporting to work with intoxicants or mind-altering substances in his or her system
- when an employee suffers an on-the-job injury or is involved in an accident while at work
- in connection with a routine fitness for duty examination, or
- on a random basis. The presence of 0.05% alcohol or the presence of any other intoxicants or mind-altering substances in the body is a violation of this policy, regardless of when consumption or ingestion occurred. Refusal of an employee to undergo testing or to cooperate fully with any of these tests is also a violation of our policy.

Our employees are also prohibited from possessing, using, selling or purchasing any alcoholic beverages or other mind-altering substances in School vehicles, on School property or at

School programs. Off-premises possession, use, sale or purchase of mind-altering substances and off-premises alcohol abuse may reflect unfavorably on the School's reputation and is also prohibited.

This policy does not prohibit the proper use of medication under the direction of a physician. However, the misuse or abuse of such drugs is prohibited. Employees who are taking prescription or nonprescription drugs, which could affect their ability to perform their job in a safe and efficient manner, must notify their immediate Supervisor of this fact when they report to work.

Violation of any aspect of the School's Drug and Alcohol Policy will result in discipline up to and including immediate termination. In addition, the School may report use, sale or possession concerns to civil authorities.

#### 12. Ethics and Conflict of Interest

Successful business operations and the reputation of our school are built upon the principle of ethical conduct of our employees. Our reputation for integrity and excellence requires careful observance of the spirit and letter of all applicable laws and regulations, as well as a scrupulous regard for the highest standards of conduct and personal integrity.

The continued success of our school is dependent upon public trust, and we are dedicated to preserving that trust. Employees owe a duty to the School, the parents, students and general public to act in a way that will merit their continued trust and confidence. We comply with all applicable laws and regulations, and the School expects its directors, officers and employees to conduct business with the letter, spirit and intent of all relevant laws and refrain from any illegal, dishonest or unethical conduct.

In general, use of good judgment, based on high ethical principles, will guide you with respect to lines of acceptable conduct. In carrying out your responsibilities, you should avoid even the appearance of impropriety and should act for the sole benefit of the School and your students. You should avoid placing yourself in positions in which your personal interests are, or may be, in conflict with the interests of the School. Examples of areas of potential conflict of interest are:

• Financial Interests: Ownership by the individual directly or indirectly of a material financial interest in any business or firm from which the School obtains goods or services or which is a competitor of the School; competition by the individual, directly or indirectly, with the School in the purchase or sale of property or any property right or interests; representation of the School by the individual in any transaction or activity in which the individual, directly or indirectly, has a material financial interest; any other circumstance in which the individual may profit, directly or indirectly, from any action or decision by the School in which he or she participates, or which he or she has knowledge.

- Inside Information: Disclosure or use by the individual of confidential information about the School, its activities or intentions, for the personal profit or advantage of the individual or any person.
- Conflicting Interest Other than Financial: Representation as a director, officer, agent or fiduciary of another company, institution, agency or person in any transaction or activity which involves this school as an adverse party or with adverse interests.
- Gifts and Favors: Acceptance of gifts or favors from any firm or individual which does or seeks to do business with, or is a competitor of, the School under circumstances which imply reasonably that such action is intended to influence the individual in the performance of his or her duties.

# 13. Reporting Obligations

Where a potential conflict of interest exists, or if a situation arises in which it is difficult to determine the proper course of action, or if you become knowledgeable about another person or employee who may be engaging in questionable or illegal conduct, it is your responsibility to report the situation to one or more of the following persons: an immediate supervisor, Principal or Head of School. These persons can provide guidance and take such action as may be appropriate in the best interests of the School.

Compliance with this policy for business ethics and conduct is the responsibility of every School employee. Disregarding or failing to comply with this standard of business ethics and conduct could lead to disciplinary action, up to and including termination of employment.

#### 14. Interactions with Students

Appropriate interactions and communication between teachers and students are expected and encouraged. Inappropriate interactions and communication with students could be grounds for dismissal and will not be tolerated. The following is a list of inappropriate interactions with students. This list is not all inclusive and other, similar activities should also be avoided:

- Encouraging or allowing students to call you by a first name (teachers) or an inappropriate nickname.
- Touching students or their clothing inappropriately, or touching a student with aggression, anger or in frustration. A hug of a student of the same gender in a public space is permitted, but not in private.
- Meeting with students one on one in a closed room not visually accessible or anywhere alone in your home.
- Giving an individual student a car ride (more than one student is permitted) with rare exceptions.
- Engaging students to perform personal errands for you.
- Discussing inappropriately personal affairs of other students, colleagues or yourself.
- Speaking with innuendo to suggest a relationship or sexual subjects.

- Flirting
- Visiting a student to "hang out" one-on-one in his/her hotel room when on field trips or at sporting events.
- Swearing, making inappropriate sexual, racial or ethnic comments.
- Telling off-color jokes
- Telling students to "keep secrets" or instructing them to withhold information from others.

## 15. Unlawful Activity and Whistleblower Policy

No employee may engage in any unlawful activity either on or off the job.

### Whistleblower Policy

All employees should observe high standards of business and personal ethics in the conduct of their duties and responsibilities. The School expects all employees to practice honesty and integrity in fulfilling their responsibilities and to comply with all applicable laws and regulations. This Whistleblower Policy is intended to facilitate the reporting of violations or suspected violations of applicable laws or regulations or of any of the School's policies. It is the responsibility of all employees to report any such violations or suspected violations in accordance with the Whistleblower Policy outlined here.

- We strongly encourage the prompt reporting of any of the following violations or suspected violations: questionable accounting, internal accounting controls or auditing matters; violations of local, state or federal laws or regulations; violations of the School's policies.
- Employees are strongly encouraged to raise their concerns about violations or suspected violations by submitting them in the form of a complaint to the Head of School. Complaints should be in writing and should include a full statement of the acts or omissions, along with relevant dates, forming the basis of the complaint. In addition, the complaint should state that it is being made pursuant to this Whistleblower Policy. To facilitate the investigation of the complaint, the complaint should include contact information for the person making the complaint. Reports of concerns and investigations pertaining thereto shall be kept confidential to the extent possible. However, consistent with the need to conduct an adequate investigation, complete confidentiality cannot be guaranteed. An employee submitting a complaint on a confidential, anonymous basis is not required to include contact information, but should be aware that the nature of the concerns may lead to the identification of that person as the source of the complaint.
- The School will assess every complaint submitted under this Whistleblower Policy and determine the appropriate next steps, including investigation and resulting corrective and/or disciplinary actions, if appropriate. Matters reported internally will be assessed by the Head of School to determine if the allegations are true, whether the issue is material and what actions, if any, are necessary to correct the problem.

• Employment and the Whistleblower Policy: This Whistleblower Policy is intended to encourage all employees to raise serious concerns within the School for investigation and appropriate action. With this goal in mind, the School does not permit retaliation (for example, disciplinary action, demotion or job termination) or discrimination of any kind against any individual who submits, in good faith, a complaint under this Whistleblower Policy. Moreover, an individual who retaliates against someone who has reported a concern in good faith is subject to discipline up to and including termination. At the same time, employees are expected to act in good faith. Good faith means that the employee has reasonable grounds for believing the matter raised is a violation. Reports made not in good faith will be viewed as a serious disciplinary offense and may result in discipline, up to and including termination of employment. Depending on the circumstances, such conduct may give rise to other actions, including civil or criminal lawsuits.