Staff and Pupil Interactions

Introduction and Purpose

This Administrative Procedure (AP 148) is established by the Park West School Division to define appropriate and inappropriate interactions between pupils (students) and staff. This procedure is intended to support the Park West School Division's commitment, outlined in AP 210: Safe and Caring Schools, to providing school environments where every student feels safe and respected.

The procedure was formulated in compliance with Bill 19, The Public Schools Amendment Act - Safe Schools, which received Royal Assent on June 3, 2025.

Key Definitions

- ***Boundaries:*** These are professional standards and legal responsibilities that guide professional behavior by staff members when interacting with or communicating with pupils.
- ***Intention:*** Any act or outcome undertaken with express advance planning and/or purpose by a staff member.
- ***Pupil:*** Any person attending or participating in school instruction or activities inside or outside of Manitoba, subject to exceptions.
- ***Staff or Staff Member(s):*** This category includes all school or school division employees, such as administration, teaching and non-teaching staff, coaches, volunteers, teacher candidates, school board trustees, and practica candidates.
- ***Parent/Guardian/Responsible Adult:*** Any person who exercises parental duties and obligations over a pupil through biological, adoptive, customary, temporary ward or custody, host family arrangement, or other legally defined responsibility.
- ***Unacceptable Conduct:*** This includes abusing another person physically, sexually, psychologically, verbally, in writing, or otherwise, and also includes bullying another individual.

Boundaries and Appropriate Conduct

Staff members hold a **legal position of trust and power** in relation to pupils, which applies always and under all circumstances, regardless of whether the staff member or pupil is at the school site.

Key principles of the staff-pupil relationship include:

- If this position of trust and power is compromised, the relationship exceeds the boundaries of an appropriate staff-pupil relationship.
- Such a compromise constitutes a breach of power, a breach of employment duties, and a betrayal of parental and public trust.
- Staff are encouraged to be diligent in avoiding any conduct that is unprofessional, meaning any act not required for learning and instruction, or any act that could be reasonably perceived as a breach of power or trust.

Best Practices for Staff-Pupil Interactions

The following practices are strongly recommended to ensure acceptable boundaries remain in place and to minimize potential risk and harm.

During School Hours

- **Authorization and permission:** Staff should not intentionally invite or allow a pupil to visit with them at, meet them at, or concurrently make use of a non-school or private property (including a pupil's residence or property), unless specific authorizations are secured:
    - Advance authorization and permission are sought from the staff member's immediate supervisor.
    - The staff member also seeks further written approval from the pupil's parent/guardian/responsible adult in advance, which is then submitted to the supervisor.
- **Recurring interactions:** For recurring interactions (more than once per month under these conditions), a general authorization covering all interactions may be sought from both the immediate supervisor and the parent(s)/guardian(s)/responsible adult(s).

Exceptions to Parental/Guardian Approval: In rare situations, notification may be deemed inappropriate, such as when it could pose a risk of harm to the pupil, when the pupil is legally emancipated, or when notification would unduly interfere with the staff member's divisionally mandated duties. In such cases, the supervisor must assess whether granting permission without notification poses any potential risk to the pupil or staff member, and approval should only be granted if all foreseeable risks have been appropriately addressed and mitigated.

Outside of School Hours

- **Private Property:** If staff intentionally invite or allow pupils to use private property, it must be subject to express, verifiable written consent or permission of the parent/guardian/responsible adult and the staff member's supervisor.

- **Unintentional Interactions:** Happenstance or unplanned interactions (like acting as a private citizen in the community) are permissible, though staff should avoid interactions that may give rise to public perception of unprofessional conduct.

- **Family or Kinship:** Interactions (including online communications) arising from established family or kinship relationships are permissible, but parental/guardian/responsible adult consent is still strongly recommended.

- **Electronic Communication:** Staff must limit communications with pupils outside of regular school hours, on weekends, and during school breaks to the greatest extent possible. Exceptions may only be authorized in unique circumstances where necessary to support student safety, accessibility, well-being, or learning needs, provided that such communication is pre-approved by school administration and parents or guardians are included in or advised of the communication.

Specialized Support, Resource, and Guidance Interactions

Some pupils require individualized or specialized support, guidance, or interventions that may involve one-on-one interactions with staff (such as student services teachers, resource teachers, counsellors, or educational assistants).

When such interactions are necessary:

- The interaction must occur in accordance with this Administrative Procedure and within clearly defined professional boundaries.
- All required authorizations, supervision plans, or parental/guardian notifications must be secured and documented in advance whenever practicable.
- Staff should notify their immediate supervisor of the ongoing nature and purpose of such individualized support arrangements.
- Interactions are to remain strictly professional, limited to the purpose of instructional, therapeutic, or guidance support, and consistent with divisional and professional codes of conduct.
- Where possible, the “Rule of Two” should still be observed—by ensuring visibility, transparency, or proximity to other staff (for example, meeting in an open or observable space, or maintaining a door or window view).

The "Rule of Two"

Staff are strongly encouraged and recommended to use the "Rule of Two," which is practiced by having two adults present during any interaction with a pupil(s). This is recommended for planning individualized or small group interactions during and outside of the school day to protect both pupils and staff in potentially vulnerable situations. If having two adults is not possible, staff should consider alternatives, such as meeting in a public area within the school, having another pupil or staff member present, and/or leaving their classroom or office door open.

General Practices (During and Outside of School Hours)

Staff should generally avoid the following conduct:

- **Emotional and Social Interactions:** Staff should create emotional connections only within the confines of a professional staff–pupil relationship.

- **Physical Contact:** Staff should avoid engaging in any unnecessary physical contact or interactions with a pupil.

- **Personal Information:** Staff should not share information about their own personal life or the personal life of others with pupils. Staff must never share romantic, sexual, or other private or sensitive information not relevant to instruction or activity. Voluntary disclosure of personal information regarding sexual orientation or personal experience is permissible only in the context of school events intended to foster a supportive learning environment.

- **Gifts:** Staff should avoid giving gifts to individual pupils that could be perceived as having significant value or being of a personal or intimate nature.

- **Attention and Favouritism:** Staff should avoid singling out a particular pupil or group of pupils for inappropriate personal attention or friendship beyond the usual staff–pupil relationship. This includes making comments or sharing observations concerning a pupil's appearance, dress, or other characteristics, or showing excessive attention or favouritism.

- **Secrecy and Inappropriate Comments:** Staff should not ask or encourage a pupil to keep specific information or incidents from others. They should also avoid making or participating in unacceptable or inappropriate comments or jokes of a sexual or profane nature or using inappropriate language or profanity.

- **Parental Role:** Staff should avoid taking on the role of a surrogate parent, guardian, or responsible adult for a pupil (even if requested by child welfare authorities). Staff must also avoid criticizing a pupil's parents, guardians, or responsible adults to the pupil.

- **Inappropriate Behavior:** Staff must not become involved with a pupil in any way that could be viewed as inappropriate or of a sexual nature.

Electronic Communication and Sharing

- All communications between staff and pupils regarding educational programming, extracurricular activities, student support, or other school-related matters must occur only through division-approved and monitored online communication platforms using a recognized school source, device, or other approved technology.
- Communications must remain professional and strictly for school-related reasons, and staff must adhere to divisional expectations regarding the appropriate use of digital communication tools, social media, and online platforms.
- Staff must not initiate, maintain, or participate in one-to-one communications with pupils through personal social media accounts, social networking platforms, private messaging applications, texting, or any messaging features embedded within such platforms.
- Staff must not add, follow, subscribe to, connect with, or otherwise engage with pupils through personal social media accounts where direct or private communication is possible (subject to established family or personal relationship exceptions).
- Staff should not share passwords, online handles, usernames, or identifiers for social media, school, or personal email or other means of communication.

Abuse Prevention Training

Staff, coaches, and volunteers are mandated to complete required abuse prevention training programs at minimum once every four years. Staff must complete the Respect in School Program, while any staff or volunteers involved in extracurricular activities must complete the Respect in Sport Program. These programs promote competence and increase awareness and understanding of the many forms of neglect, bullying, harassment, and abuse, including sexual exploitation and abuse.

Duty to Report and Addressing Violations

This section outlines procedures for reporting and addressing violations related to staff-pupil interactions.

- **Staff Reporting Obligation:** If any staff member becomes aware of or has reason to believe another staff member is violating acceptable boundaries with a pupil, the staff member must report the matter at the earliest possible time to their supervisor, principal, and/or superintendent/assistant superintendent. Failure to report violates legal obligations under The Public Schools Act, The Criminal Code of Canada, and The Child and Family Services Act.

- **Consultation for Staff:** Staff members who find themselves in a difficult situation related to boundaries or have questions regarding conduct are encouraged to consult their supervisor, principal, and/or superintendent/assistant superintendent.

- **Reporting Pupil Infringement:** If a pupil is, or may reasonably be perceived to be, infringing upon a staff member's professional and/or personal boundaries, attempting to establish an inappropriate relationship, or engaging in compromising conduct, staff members are strongly recommended to consult with their supervisor, principal, and/or superintendent/assistant superintendent.

- **General Public Reporting:** Staff, pupils, parents/guardians, or visitors who believe a staff member may have engaged in or is engaging in conduct that may violate this policy should notify a supervisor, principal, and/or superintendent/assistant superintendent.

- **Stakeholder Awareness:** The division and schools will ensure that staff, pupils, and families are informed of these online communication expectations, understand the importance of maintaining professional boundaries in online environments, and have public access to these requirements on school websites.

Review, Communication, and Updating

- To ensure the effectiveness and relevance of this administrative procedure, Park West School Division includes provisions for regular review and updates. We commit to conducting periodic reviews of the policy to reflect changes in technology, social media platforms, and relevant legislation.

- In accordance with Manitoba Education and Early Childhood Learning directives, this administrative procedure is communicated directly to all employees, students, and families, and is maintained in a publicly accessible location on school and divisional websites.