

# Ethics: Reporting, Investigation, and Response to Misconduct and Abuse

Title: Reporting, Investigation, and Response to Misconduct and Abuse

SOP Number: IBJ-2026-01

Effective Date: Feb 26, 2026

Review Date: Church Leadership, Directors, and School Board

Approved By: Church Committee, School Board

## 1. Purpose

The purpose of this SOP is to establish a clear, consistent process for reporting, investigating, documenting, and responding to allegations of misconduct, including abuse, neglect, and boundary violations, by staff and administrators at Idella B. Jones Christian Academy Private School.

This procedure ensures compliance with Florida Statutes §1012.796, §39.201, and related Florida Department of Education (FDOE) requirements, and prioritizes the safety, protection, and well-being of all students.

## 2. Scope

This SOP applies to all employees, contractors, volunteers, and administrators of the school. Misconduct includes, but is not limited to:

- ◇ Abuse, neglect, or endangerment of a child or student
- ◇ Physical abuse (hitting, striking, unreasonable restraint, or physical harm)
- ◇ Emotional or psychological abuse (humiliation, intimidation, threats, or coercion)
- ◇ Sexual abuse, sexual misconduct, or sexual harassment
- ◇ Improper boundaries or grooming behavior
- ◇ Neglect of duty that places students at risk
- ◇ Fraud, theft, or misappropriation of funds
- ◇ Violations of professional ethics or Florida teaching standards
- ◇ Any other behavior that could harm students, staff, or the school community

## 3. Definitions

1. **Misconduct:** Any action by a staff member or administrator that violates state law, professional standards, or school policy, including conduct that constitutes abuse or neglect.
2. **Abuse:** Any willful or negligent act that results in physical injury, mental injury, sexual abuse, exploitation, or the risk of harm to a child.
3. **Neglect:** Failure to provide adequate supervision, care, or protection resulting in harm or risk of harm.
4. **Mandatory Reporter:** Any employee or volunteer required by Florida law to report suspected child abuse, neglect, or sexual misconduct immediately.
5. **Grooming Behavior:** Patterns of behavior used to gain trust of a minor for the purpose of exploiting or abusing the child.

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6. **FDOE Reportable Misconduct:** Conduct that must be reported to the Florida Department of Education pursuant to §1012.796.
7. **Sexual Misconduct:** Any verbal, physical, visual, or digital conduct of a sexual nature that is inappropriate in a school setting or violates professional boundaries, including grooming behavior.
8. **Two-Adult Rule:** A safeguarding requirement that no adult staff member may be alone with a student in an unsupervised setting when reasonably avoidable.
9. **6-Month Rule (Pre-Employment Verification):** A safeguarding requirement that all new hires and volunteers must have no unexplained employment gaps exceeding six (6) months, or must provide written explanation and verification for any gap before hire.

### 4. Reporting Procedure

#### 4.1 (Background Checks (Mandatory))

Prior to employment or volunteer assignment, the school shall conduct:

- Level 2 fingerprint-based background screening (per Florida law)
- National criminal background check
- Sexual offender and predator registry check
- Child abuse registry check (where available)

No individual may begin working or volunteering with students until clearance is confirmed.

#### 4.2 Reference Checks (Mandatory)

At least **two professional reference checks** must be completed prior to hiring.

References must specifically address:

- Character and professionalism
- Any prior concerns involving boundaries with minors
- Eligibility to work with children

Documentation of reference checks must be retained in personnel files.

#### 4.3 6-Month Employment Gap Rule

- Any applicant with a gap in employment exceeding six (6) months must:
- Provide a written explanation of the gap
- Provide verifiable activity during that time (education, care giving, employment, relocation, etc.)
- Be subject to additional screening or interview review before hiring approval
- Unverified gaps may result in disqualification from employment or volunteer service.

#### 4.4 Two-Adult Rule (Student Safety Requirement)

1. To reduce risk of misconduct and ensure accountability:
2. No staff member shall be alone with a student in a closed or unobservable environment when reasonably avoidable
3. Meetings, tutoring, counseling, or disciplinary conversations must occur in visible or supervised spaces
4. If private interaction is required, it must occur with another adult present or within view of others
5. Exceptions must be documented and approved by administration in advance

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4.5 Immediate Reporting: Any staff member who suspects, observes, or becomes aware of any form of abuse, neglect, or misconduct must:

- ✓ Immediately ensure the safety of the student(s) involved.
- ✓ Report the concern without delay to the Principal, School Compliance Officer, or designated HR representative
- ✓ Not investigate independently or attempt to verify allegations
- ✓ In cases of suspected child abuse or neglect, reports must also be made immediately to the:

Florida Abuse Hotline (DCF): 1-800-962-2873

or via the DCF online reporting system.

Failure to report suspected abuse as required by law may result in legal consequences.

4.6 Response to Immediate Safety Concerns:

- If a student is believed to be in immediate danger:
- The staff member must contact emergency services (911) if necessary.
- The student must be separated from the alleged offender.
- The alleged offender must be removed from student contact pending review.
- The Compliance Officer must be notified immediately.

4.7 Reporting to the FDOE

The Compliance Officer shall submit all allegations of misconduct to the Florida Department of Education within 24 hours of receipt, per §1012.796. Required information includes:

- 1) Name and position of the staff member/administrator
- 2) Nature of the misconduct (including abuse classification, if applicable)
- 3) Date, time, and location of the incident
- 4) Names of witnesses, if any
- 5) Any immediate protective actions taken
- 6) Whether child protective services or law enforcement were notified

4.8 Confidentiality and Non-Retaliation

- ❖ All reports will be handled confidentially to the extent allowed by law
- ❖ The identity of the reporter will be protected where possible
- ❖ Retaliation against any individual who reports suspected misconduct or abuse is strictly prohibited
- ❖ Any retaliation will result in disciplinary action, up to and including termination

**5. Investigation Procedure-** In cases involving alleged sexual misconduct:

1. Immediate separation of accused staff from student contact is mandatory
2. Staff member shall be placed on administrative leave pending investigation
3. Law enforcement and/or DCF shall be notified immediately when required
4. Preservation of evidence (digital, written, or physical) must be ensured

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5. The Compliance Officer/School Administrator or designee will initiate an investigation immediately upon receipt of a report
6. Investigations must be thorough, impartial, trauma-informed, and documented in writing
7. Allegations involving abuse may require coordination with law enforcement or child protective services

### **Protective Measures:**

- a. The accused staff member may be placed on administrative leave
- b. Access to students will be restricted pending outcome
- c. Interviews will be conducted in a manner that avoids re-traumatization of the student
- d. All documentation of findings will be maintained securely for a minimum of 5 years or as required by Florida law.

### **6. Corrective Actions**

Depending on the findings, corrective action may include:

- i. Immediate termination of employment
- ii. Suspension or reassignment
- iii. Mandatory retraining or corrective counseling
- iv. Referral to law enforcement for criminal investigation
- v. Notification to FDOE regarding outcomes and disciplinary actions
- vi. Revocation or reporting of certification status if applicable

### **7. Insurance Carrier Notification (NEW REQUIREMENT)**

- ◇ The Compliance Officer or designated administrator must notify the school's liability insurance carrier within 24–48 hours of any allegation involving:
  - ◇ Sexual misconduct
  - ◇ Abuse or neglect
  - ◇ Serious bodily injury
  - ◇ Any claim likely to result in legal action

#### **Notification must include:**

- 1) Date of incident report
- 2) General nature of allegation
- 3) Immediate protective actions taken
- 4) Confirmation of law enforcement/DCF involvement if applicable
- 5) Failure to notify may affect coverage or claims eligibility.

### **8. Media Handling Protocol**

All communications with media, press, or public inquiries regarding allegations of misconduct shall be handled exclusively by the designated administrator or Board representative.

**Staff are strictly prohibited from:**

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1. Speaking to media regarding incidents
2. Posting or commenting on social media about allegations
3. Sharing student, staff, or investigation details externally
4. All inquiries must be directed to:
5. Designated Media Contact: Administrator or designee
6. The school will provide only legally permitted, non-confidential statements to protect student privacy and comply with FERPA and Florida law.

### **9. Investigation Procedure (Expanded for Sexual Misconduct)**

- ✓ All investigations must be trauma-informed, objective, and documented
- ✓ Allegations of sexual misconduct require immediate administrative escalation
- ✓ Coordination with law enforcement or child protective services is mandatory when required
- ✓ Interviews must be conducted in a manner that avoids re-traumatization

#### **9.1 Training and Awareness**

All staff and administrators shall receive mandatory training on: Annual and on-boarding training must include:

- Sexual misconduct prevention and identification
- Grooming behavior recognition
- Two-adult rule enforcement
- Mandatory reporting laws
- Professional boundaries in school settings
- Media and confidentiality protocols

#### **Training must occur:**

Within 30 days of hire

Annually thereafter

### **10. Corrective Actions**

#### **May include:**

- Immediate termination
- Reporting to FDOE and law enforcement
- Revocation of school access and credentials
- Mandatory reporting to licensing and certification bodies
- Insurance claim filing and legal referral

### **11. Documentation and Record-keeping**

All reports, investigations, and outcomes must be documented and retained in accordance with Florida law.

Records must include:

- ✓ Date and time of report

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- ✓ Individuals involved
- ✓ Description of allegations
- ✓ Actions taken to ensure student safety
- ✓ Investigation steps and findings
- ✓ Final disposition and corrective actions
- ✓ All records must be stored securely with restricted access.

### **12. References**

- I. Florida Statutes §1012.796
- II. Florida Statutes §39.201
- III. Florida Department of Education OPPAGA Guidelines
- IV. Florida Child Protection Laws
- V. Insurance carrier risk management requirements (policy-specific)

### 10. Approval and Implementation

Board Approval & Adoption Date: February 26, 2026

Policy Revised/Updated: April 15, 2026

Board Approval: Date: April 27, 2026