



ASB Code of Conduct

To ensure the safety of children and the well-being of our school community

1. *This Code of Conduct applies to the American School of Bombay's (ASB) internal and extended community which includes, but is not limited to Employees, Parents / Guardians, Students, Contractors, Subcontractors, Consultants, Board Members, and Guests.*
2. *This Code of Conduct is applicable for all ASB activities whether they occur on campus, off-campus, or virtual.*

Section 1 - Student Safety and Wellbeing

The American School of Bombay (ASB) is committed to the safety and protection of students. This Code of Conduct applies to all ASB Community Members including, but not limited to, employees, volunteers, consultants, coaches, students, and parents/guardians who represent the school and engage with students in both a direct and/or unsupervised capacity.

The public and private conduct of all adults (faculty, staff, students, and volunteers, etc.) acting on behalf of ASB can inspire and motivate those with whom they interact or can cause great harm, if inappropriate. We must, at all times, be aware of the responsibilities that accompany our work.

We should be aware of our own and other persons' vulnerability, especially when working alone with students, and be particularly aware that we are responsible for maintaining physical, emotional, and sexual boundaries in such interactions. We must avoid any covert or overtly sexual or other inappropriate behaviors with those for whom we have responsibility. This includes seductive speech or gestures as well as physical contact that exploits, abuses, or harasses. We are to provide safe environments for students at all ASB campuses (including virtual) and events.

We must show prudent discretion before touching another person, especially a student, and be aware of how physical touch will be perceived or received, and whether it would be an appropriate expression of greeting, care, concern, or celebration. ASB adults, personnel, and volunteers are prohibited at all times from physically disciplining a child.

Physical contact with students can be misconstrued both by the recipient and by those who observe it, and should occur only when completely nonsexual and otherwise appropriate, and never in private.

On-campus: One-on-one meetings with a student are best held in a public area; in a room where the interaction can be (or is being) observed, or in a room with the door left open, and another staff member or supervisor is notified about the meeting. Meetings should always be on campus.

Virtually: One-on-one virtual meetings should be in a space with a neutral background and with parental consent received prior to the meeting.

We must intervene when there is evidence of, or there is reasonable cause to suspect, that students are being abused in any way. Any suspected abuse or neglect must be reported to the appropriate school personnel and authorities as described in ASB's Child Safeguarding Policy.

Employees, volunteers, consultants, and coaches are not permitted the illegal possession and/or illegal use of drugs and/or alcohol at any time, and are prohibited from the use of tobacco products, alcohol, and/or drugs when responsible for students. Adults should never buy or share alcohol, drugs, cigarettes (including e-cigarettes), videos, apps, or reading material that is inappropriate and give it to students. Staff members and volunteers should not accept gifts from or give gifts to students without the knowledge of their guardians.

Communication with students is governed by the key safety concept of transparency. The following steps will reduce the risk of private or otherwise inappropriate communication between ASB parents, administration, teachers, personnel, volunteers, and minors:

- Communication between ASB (including volunteers) and all students (minors and adults) that is outside the role of the professional or volunteer relationship (teacher, coach, host, etc.) is prohibited.
- Email exchanges between a minor and a person acting on behalf of the School are to be made using a school email address.
- All Electronic communication that takes place over a school network or platform is subject to monitoring.
- All communications (such as WhatsApp, Slack) that involve students and staff must be monitored by a divisional or all school leader.
- Staff and volunteers who use any form of online communications including social media (Facebook, Twitter, etc.) and text messaging to communicate with minors may only do so for activities strictly involving school business and must utilize an ASB approved platform. Staff, Consultants, Coaches, etc. cannot be “friends” or communicate with current students and former students who are minors.

ACKNOWLEDGMENT OF ASB CODE OF CONDUCT

ASB promotes a safe and positive community and has a special obligation to protect students. I promise to strictly follow all policies and guidelines in the ASB Code of Conduct as a condition of my providing services to students participating in ASB programs.

I Will:

- Act as a role model for students through my words and actions.
- Maintain physical boundaries at all times and ensure that physical contact – when necessary – is only in ways that are appropriate, public, and consensual.
- Ensure that bathroom visits are safe and respectful of student privacy.
- Follow this ASB Code of Conduct when supervising school field trips and overnight trips.
- Meet individually with a student only in an open, observable setting or online with parent consent and in a neutral space.
- Notify another adult when meeting with students outside of school hours.
- Comply with guidelines to report suspected child abuse or neglect.
- Protect ASB data and comply with ASB’s Data Confidentiality Agreement (Section 2).
- Report any breach of this Code of Conduct to a member of the Leadership Team, or the Director of Human Resources.

I Will Not:

- Initiate or encourage any physical contact while alone with a student.
- Transport students without parental consent unless it is a medical emergency.
- Use alcohol or other inappropriate (illegal) substances on school property or while participating in student-related activities away from ASB.
- Accept gifts from or give personal gifts to students without the knowledge of their parents.
- Invite a student to my home or arrange to meet with a student away from school property/school online learning platforms.
- Provide lessons virtually in a non-neutral space, such as a bedroom.
- Engage in private communications with students and ex-students who are minors via text messaging, email, Facebook, Twitter, or similar forms of electronic or social media except for activities strictly involving school business and utilizing school approved platforms.
- Post photos or other information about students for non-school related reasons.

Board Policies Pertaining to Student Safety:

- [Child Safeguarding Policy](#) Board Policy 8.440
- [Safeguarding - Harassment, Bullying, and Discrimination](#) Board Policy 8.245
- [Background Checks for Child Safeguarding](#) Board Policy 6.241
- [Safeguarding - Harassment, Bullying, and Discrimination at Work](#) Board Policy 6.420



Section 2 - Data Confidentiality Agreement

Definition:

ASB Institutional Data:

ASB Institutional Data is a generalized term that typically represents data classified as Confidential or Public. This term is often used interchangeably with sensitive and personal data. Institutional Data is defined as all data created, owned, or licensed by ASB.

Confidential/Protected Data: Data should be classified as Confidential/Protected when the unauthorized disclosure, alteration, or destruction of that data could cause a significant level of risk to ASB. The highest level of security controls should be applied to Confidential/Protected data.

Public Data: Data should be classified as Public when the unauthorized disclosure, alteration, or destruction of that data would result in little or no risk to ASB.

As a member of the ASB Community:

- I acknowledge my responsibility to respect the confidentiality of student and staff records and to act in a professional manner in the handling of ASB data such as, but not limited to, photos, videos, official school records, formative and summative assessments, anecdotal notes, etc.
- I will ensure that data on individual students is not created, collected, stored, maintained, or disseminated in violation of any ASB Policies*, guidelines, and or practices. If I am unsure of the Policies*, guidelines, and practices, I will ask my divisional leadership team or supervisor.
- Any notes that I write about a student, faculty, or staff or conversations that I have about a student, faculty, or staff will hold a professional tone and be respectful to all.
- I will not share ASB Confidential Data with any third party, including other schools. When students transfer to other schools, all data will be transferred through the divisional principal and the responsible ILS personnel who will comply with the ASB student data sharing policy.
- Student and staff data will only be accessed for students or staff for whom I have a legitimate purpose and will be used for the sole purpose of improving student achievement.
- I understand that student-specific and ASB Institutional data is to be transmitted only between ASB approved systems and people (e.g. MAP data, literacy assessment results, and attendance records) unless permission is granted by a member of the divisional leadership team or supervisor.
- Email communication about students or staff should not have their name in the subject line - initials or code are acceptable.
- I understand that it is inappropriate for a student to have access to another student's confidential data. I will not share any student's information from any source with another student.
- I will not store ASB Institutional data on any personal computer and/or external devices that are not password protected and ASB approved. (external devices include but are not limited to USB/Thumb drives and external hard drives)
- I will follow a "clean desk policy" and not leave student data in any form accessible or unattended, including information on a screen, display, or paper. All data will be kept securely.
- I will remove all ASB confidential data (student, parent, Staff) information from all my devices on completion of my Contract / term at ASB.
- I will tag ASB's appropriate social media platform in any post I make with regard to the learning in my classroom.
- The Advancement and Admissions Office will provide a list of those students whose parents have indicated that their photos will not be used by the school. Their images will not be used in any public posting or school-related posting.
- If photos/videos are to be posted on public social media, then I will not:
 - Indicate names / student identities
 - Include the building entries/exits or facade of the school building
 - Geotag photos/videos
- If photos/videos are posted on a school approved platform (e.g. Friday Flash, Veracross Portal, SeeSaw, School Social Media Accounts), I will remove the photos/videos from my personal devices within 24 hours.

Board Policies Pertaining to Confidentiality*:

- [Confidentiality](#) Board Policy 8.120
- [Student Academic Records](#) Board Policy 7.250
- [Personnel Records 6.470](#) Board Policy 6.470



I confirm that I have read and understood the ASB Code of Conduct (Sections 1 and 2) and agree to follow the above standards of practice. I understand that any action inconsistent with this, or failure to take action as mandated by this Code, may result in non-renewal or termination.

Full Name:

Signature:

Date:

To be completed by non-ASB Employees Only:

ASB (Veracross) ID, Number available on the ID Card :

OR

Organization's name that you represent:

Address:

Cell Number:

Email:

