Administrative Procedure 2127

Staff and Student Interactions

Board Governance Policy Cross Reference: 1, 11, 12, 13, 14

Administrative Procedures Cross Reference:

Student Code of Conduct

Dispute Resolution

Off-Site Programs and Activities

Use of Personal Mobile Devices by Employees, Trustees, Parents, Volunteers and Visitors

Enhancing Protections for Students

Form Cross Reference:

Student Protection – Complaint Report

Legal/Regulatory Reference:

The Education Administration Act

The Public Schools Act

Date Adopted: January 2026

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This administrative procedure provides key information on personal and professional boundaries as well as acceptable behaviours that can serve to promote safety for students, staff, and volunteers.

The guidelines in this administrative procedure are the firm expectations of the Division and are compliant with The Education Administration Act. All staff are required to familiarize themselves with these guidelines and incorporate them into their daily practice.

This administrative procedure provides an overview of human trafficking, sexual exploitation, and provides clarification on “consent”.

Staff Interactions with Students: Recommended Best Practices

Introduction

All Brandon School Division staff and school-based volunteers will complete the "Respect in Schools" Program. Staff and volunteers providing supervision or coaching of intramural or extra-curricular school athletics programs will also complete the "Respect in Sport" program. These programs provide valuable information to help all staff become aware of circumstances within our school communities that challenge positive interactions, or where students may require special support or assistance from staff. These programs must be updated every 4 years. The overarching purpose of this administrative procedure is to ensure that staff are aware of how they can protect themselves and their students for their mutual benefit and advantage, while helping schools and school divisions to recognize many forms of staff-student interactions that deserve special consideration.

Definitions

Boundaries - defined as professional behaviour by staff members while and when interacting with/communicating with students. See "behaviours" section in the content that follows, for further clarification and definition of acceptable boundaries.

Intention/intentional/intentionally - any act or outcome undertaken with express advance planning and/or purpose by a staff member.

Parent/guardian - any person who exercises parental duties and obligations over a student by virtue of biological, adoptive, customary, temporary ward or custody, or host family arrangement.

Property/properties - means any physical, electronic, stationary, moveable or vehicular properties.

Student - means any person attending or participating in school instruction or activities inside or outside of Manitoba, subject to exceptions as laid out in the content that follows.

Staff or staff member(s) - includes all school or school division employees including administration, teaching and non-teaching staff, as well as coaches, volunteers, teacher candidates and practicum candidates.

Boundaries

As with any relationship, boundaries are important guideposts for defining what should and should not be done, what is acceptable or not acceptable, and what promotes the best interests of all people who are in that relationship.

In the context of staff-student relationships within and outside of school, it is very important for all staff to be aware that they hold a legal position of trust and power in relation to students. They are deemed to be *in loco parentis*, or in place of the parents, when supervising or otherwise engaging with students. While legal obligations may vary depending on the specific circumstances, the position of trust does not stop when a staff member or a student leaves the school. It applies at all times and under all circumstances.

A compromise of the position of trust and power is an act or omission that exceeds the boundaries of an appropriate student/staff relationship. An abuse and/or breach of power on the part of the staff member, a breach of their required employment duties and responsibilities, and/or a breach and betrayal of both parental/guardian and public trust, are all detrimental to our students and the communities we serve.

The following requirements and best practices are designed to ensure that appropriate professional boundaries remain in place at all times. Staff are expected to maintain appropriate and professional boundaries with all students.

Acceptable vs. Unacceptable Behaviours

The following best practices are particularly designed to raise further understanding of staff-student interactions and/or communications that are, could lead to, or may be perceived as flirtatious, sexually suggestive, abusive (physical/mental) or otherwise objectively inappropriate and unacceptable. While these are not the only behaviours and boundaries that might be considered by staff when interacting with students, they remain among the most damaging and negative should they occur, for both students and for the staff themselves.

Staff must be diligent in avoiding any conduct that is unprofessional; this is to say any act that does not represent a staff-student interaction that is required for learning and instruction, or that could reasonably be perceived as a breach of power or trust on the part of the staff member by others.

Compliance with these recommended behaviours is not designed to restrict or challenge staff members' own personal or professional freedoms. Rather, these recommendations are designed to keep staff, their students, schools, and the school division safe, to minimize potential risk and harm, and to promote the proper exercise of their authority and trust under all circumstances.

Best Practices

During school hours:

1. Staff members should not intentionally invite or allow students to visit with them at, meet them at, or conjointly and concurrently make use of a non-school or private property (including a student's residence or property), for any purpose unless:

    i. advance authorization and permission is sought from the staff member's immediate supervisor, and

    ii. such authorization from the supervisor does permit for this interaction to occur.

    a) staff members who have obtained approval from their immediate supervisor should additionally seek written approval from the student's parent/guardian in advance and this written approval from the student's parent/guardian should be submitted by the staff member to their supervisor at the earliest possible time using existing parent/guardian consent or release forms.

    b) In circumstances where no parental/guardian approval or consent is required, such as in contexts:

        i) involving students who are legally emancipated;

        ii) where notifying the student's parent/guardian would create potential harm or risk to the student; or

        iii) where a staff member may be unduly limited, restricted or prohibited from exercising the full scope of their divisionally mandated duties and responsibilities,

    the supervisor must carefully consider whether granting permission or approval to a staff member for purposes of engaging in such an interaction poses potential risk or harm to either the staff or student. If the supervisor is reasonably satisfied that any potential risk and harm from such interaction between staff and student is addressed, they may grant approval for it to occur.

    c) If a staff member intentionally interacts with any student(s) according to section 1 above more than once per month, a general authorization covering all recurring interactions may be sought by the staff member from both their immediate supervisor as well as from the parent(s)/guardian(s) of that/those student(s). Again, schools can provide permission slips and consent forms that cover the full length of each school year, rather than on an occasional or one-time basis.

Outside of school hours (during weekends, weeknights, holiday/break periods):

2. If a staff member intentionally invites or allows students to visit with them at, meet them at, or conjointly and concurrently make use of a non-school or private property, including a student's residence or property, for any purpose, they should only do so subject to express consent or permission of the parent/guardian of that/those student(s). It is required that such consent or permission remain verifiable if interactions between a staff member and student(s) are ever called into question.

3. Interactions between staff and students that may be unintentional – that is to say happenstance or unplanned (e.g., when either a staff member or students are acting as a private citizen in community or the neighbouring environs of the school) – remain permissible, although staff members should avoid any such interactions that may give rise to public perception of unprofessional conduct.

4. Interactions between a staff member and student(s), arising from relationships of established family or kinship between that staff member and student(s), remain permissible at all times, although it is still strongly recommended that the parents/guardians of the students provide consent to such interactions.

In general (both during and outside of school hours including extracurricular):

5. Staff must only create emotional attachments with student(s) within the confines of a professional staff-student relationship.

6. Staff must avoid sharing or disclosing information about their own personal life or the personal lives of others with any student(s), and must never share any information about romantic, sexual, or other types of private and/or sensitive information that is not relevant to the activity and/or instruction in which students are engaged.

   Voluntary disclosure of personal information between staff and students regarding a staff member's or student's personal information and/or sexual orientation, in context of school events and activities designed or intended to foster a supportive learning environment to staff or students, remains permissible.

7. Staff must avoid giving gifts to an individual student that are perceived to be of significant value or of a personal or intimate nature.

8. Staff must avoid engaging in any unnecessary physical contact or interactions with a student.

9. Staff must avoid "singling out" a particular student(s) for inappropriate personal attention and/or friendship beyond the usual staff-student relationship. "Singling out" includes making comments or sharing observations concerning a student's appearance, dress or other physical or personal characteristics.

10. Staff must avoid showing excessive attention and/or favouritism toward a student(s).
11. Staff must avoid asking or encouraging a student(s) to keep specific information or incidents from others.
12. Staff must avoid making or participating in unacceptable or inappropriate comments and/or jokes of a sexual or profane nature or use of inappropriate language/profanity in the presence of students.
13. Staff must avoid becoming involved with a student in such a way that could objectively be viewed as inappropriate or sexual behaviour.
14. Staff must keep appropriate administrator(s) informed when a significant issue develops involving a student's welfare.
15. Staff must avoid taking on the role of a surrogate parent/guardian for a student (even when and where this may be formally requested by child welfare authorities) or criticizing the student's parents/guardians to the student.
16. Staff must not start a personal relationship with a student for the purposes of a romantic relationship. Under no context or circumstance should such a relationship occur. It is an outright infringement and violation of the trust and power that defines acceptable boundaries and behaviours.
17. Staff must not add, follow, subscribe to, connect with, or otherwise engage with students through personal social media accounts where direct or private communication is possible.
18. Staff must not initiate, maintain, or participate in one-to-one communications with students through personal social media accounts, social networking platforms, private messaging applications, texting, or any messaging features embedded within such platforms. Communications between staff and students regarding educational programming, extracurricular activities, student support, or other school-related matters must occur only through School Division approved and monitored online communications platforms.
19. Staff must avoid sharing passwords, handles, names, or identifiers for social media, school or personal email or other means of communication with students.
20. Appropriate communication exceptions may 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 and caregivers are included in the communication or advised of it.
21. Exceptions involving existing family or personal relationships must be disclosed to and approved by the staff member's immediate supervisor. These would only be approved when absolutely needed.

22. Staff must minimize and avoid, to the greatest extent possible, being alone in a room with a student at school or elsewhere beyond the visibility or earshot of others (for example, with the door closed and/or if other barriers block a clear public view of the room). See below re “Rule of Two”.

Outside the School Day

It is recognized that staff or their children have intentional, amicable or happenstance interactions with other students and/or their families outside of school, such as those arising in the course of family, friendship, or community social functions or where there is a formal arrangement for a staff member to supervise, tutor or mentor a student in a non-school capacity. Within such relationships and during the course of such interactions, staff are to consult and practice 2, 3 and 4 as outlined above. Communication with students outside of the regular school day should be limited to the greatest extent possible.

Rule of Two

Staff use the **“Rule of Two”: having two adults present during the course of any interaction with a student(s), in planning for individualized or small group interactions with any student(s) during and outside of the school day, to protect students and themselves.**

The “Rule of Two” serves to protect staff and students in potentially vulnerable situations by ensuring that more than one adult is present when staff are meeting with a student both during and outside of the school day. Staff should ensure there is at least one other person, preferably another adult, with them and the student at all times. If this is not possible, staff will consider alternative measures, such as having another student or staff member present, meeting in a public area within the school or elsewhere and/or leaving their classroom or office door open.

Duty to Report

If a staff member finds themself in a difficult situation related to boundaries, has questions related to the conduct outlined above, or questions on any of the recommendations outlined in this administrative procedure, they should consult their administrator and/or Superintendent/CEO or designate.

When any staff member becomes aware of or has reason to believe another staff member is violating acceptable boundaries with a student, the staff must report the matter at the earliest possible time to their supervisor and/or Superintendent/CEO or designate. Not doing so is a violation of legal obligations on the part of every staff member. The Public Schools Act, The Criminal Code of Canada, and The Child and

Family Services Act each mandate duties for staff to report violations of acceptable boundaries according to the type of violation in question.

It is expected that staff members consult with their supervisor if a student 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 conduct or behaviours that may compromise acceptable and appropriate staff-student interactions.

Anyone who believes a staff member may have engaged in or is engaging in conduct that may violate this procedure should notify a staff supervisor. The staff supervisor may advise to complete the Student Protection – Complaint Report. The complaint will be investigated by the School Division with proper notification to agencies required by law.