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GLOSSARY OF TERMS

Abuse: There are different legal and operational definitions of child/vulnerable adult abuse across all countries. All definitions refer to the physical or psychological damage caused to another person by the abusive behavior of others, or the failure of others to protect from such damage. Most commonly, the categories of abuse cover sexual, physical and emotional abuse, neglect and exploitation. (World Health Organization – 2002)

Sexual abuse includes sexual behavior involving two or more people in the following circumstances:

- One or more persons bribe, coerce, exploit, threaten, or is violent toward the affected person;
- The affected person has less power than the other person(s);
- There is a significant disparity between the affected person and the other person(s) in intellectual capacity or maturity.

Physical abuse is the use of physical force that may result in bodily injury, pain, or impairment.

Psychological abuse is a pattern of non-physical behavior which can seriously interfere with a student's cognitive, emotional, psychological or social development, sometimes causing more lasting harm to a young student's development than overt physical abuse.

Child: Refers to a person under the age of 18 years. The definition of a child for the purposes of safeguarding and child protection should not be confused with the legal definition of a child or age limits set out in other relevant laws. The fact that a person under the age of 18 may have reached the local age of majority, age of sexual consent, voting age, etc., does not alter their inherent vulnerability as a child.

Child and Student Protection: The act of preventing and responding to violence, exploitation and abuse against children and students over the age of 18: including commercial sexual exploitation, trafficking, child labor and harmful traditional practices, such as female genital mutilation/cutting and child marriage (UNICEF).

UNICEF identifies seventeen child protection issues: armed violence reduction; birth registration; child labor; child marriage; child protection and Information and Communication Technologies (ICTs); child recruitment by armed forces or armed groups; child trafficking; children without parental care; children with disabilities; family separation in emergencies; female genital mutilation/cutting; gender-based violence in emergencies; justice for children, landmines and explosive weapons; Monitoring and Reporting Mechanism (MRM) on grave violations of children's rights in situations of armed conflict; psychosocial support and well-being; and sexual violence against children.

Collaborating Institution: An academic/non-academic institution working with universities on collaborations including students classes and conferences, etc., obliged to have similar student safety policies and procedures.

Community Safety Officer (CSO): Person(s) in charge of receiving complaints, initiating investigations and reporting to authorities.

Complainant: A person who has been subjected to a safeguarding and protection issue who is sharing their concern, disclosure or complaint either directly or indirectly through a third party.

Emotional Ill-Treatment: Behavior that negatively impacts a student's self-esteem, e.g. bullying, name-calling, etc.

Exploitation: The intentional ill-treatment, manipulation or abuse of power and control over a student; to take selfish or unfair advantage for personal gain. It may manifest itself in many forms, such as forced labor, slavery, servitude, engagement in criminal activity, begging, benefit or other financial fraud, or human trafficking. Exploitation can be sexual in nature. Universities need to be aware of the legal age for sexual consent and how their policies will affect student-faculty sexual relationships.

Grooming: Actions deliberately undertaken with the aim of befriending and establishing an emotional connection with a student to lower the student's inhibitions in preparation for sexual activity with the student.

Harm: Any detrimental effect of a significant nature on a person’s physical, psychological or emotional wellbeing. It is immaterial how the harm is caused. Harm can be caused by physical, psychological or emotional abuse or neglect, or by sexual abuse or exploitation. It may be caused by a single act, omission or circumstance, or a series or combination of acts, omissions or circumstances.

Mandatory reporting: A legal obligation in some countries imposed on selected categories of people (e.g. teachers, doctors) to report suspected cases of student abuse and neglect to government authorities. There are penalties in failing to act. It is important to note that mandatory reporting legislation overrides any professional code of conduct or ethical guidelines that may apply to a profession.

Personnel: For the purposes of this policy, personnel refers to any persons employed or conducting a service with a university and includes employees such as faculty and administrators, interns, volunteers, contractors, consultants and any religious or lay assigned to work on a university property.

Student Safeguarding: IAJU adapts the “Keeping Children Safe (Alliance) – 2014” guidelines to a university setting: “Child safeguarding is the responsibility that organizations have to make sure their staff, operations and programs do no harm to children, that is that they do not expose children to the risk of harm and abuse, and that any concerns the organization has about children’s safety within the communities in which they work, are reported to the appropriate authorities.”

Vulnerable Adult: Any person in a state of infirmity, physical or mental deficiency, or deprivation of personal liberty which, in fact, even occasionally, limits their ability to understand or to want or otherwise resist an offense. Deprivation of personal liberty can be exercised through the exertion of power over a student which results in abuse, exploitation or ill-treatment of that student.

PREAMBLE

“To walk with the poor, the outcasts of the world, those whose dignity has been violated, in a mission of reconciliation and justice.” (Universal Apostolic Preferences, no.2)

In his 2019 letter of transmittal regarding the Universal Apostolic Preferences (UAPs), Rev. Arturo Sosa, S.J., Superior General of the Society of Jesus, wrote:

“Sent as companions in a mission of reconciliation and justice, we resolve to walk with individuals and communities that are vulnerable, excluded, marginalized, and humanly impoverished. We commit ourselves to walk with the victims of abuse of power, abuse of conscience, and sexual abuse; with the outcasts of this world; with all those whom the biblical tradition knows as the poor of the earth, to whose cry the Lord responds with his liberating incarnation.”

A concern for the safety of all vulnerable persons within our community, school or program is then an indispensable component of what it means to be a Jesuit and Catholic institution.

The leadership of the Holy Father has been key to this realization of our need for clarity regarding our commitment to the principle of safeguarding of the vulnerable. He and others have insisted that a “culture of safeguarding” be characterized by transparency and responsibility, duties that fall on the shoulders of all members of our community. The Holy Father has himself been an example of our own attitude and approach. For instance, he has acknowledged the pain and guilt that has resulted from our lack of attention and concern for those abused; he has met with survivors; and he has acknowledged his own mistakes and his need to learn from survivors. As part of a larger effort on the part of the Society of Jesus and other communities of religious men and women (along with their apostolic partners),

“We join with him in his mission to humbly acknowledge and confess the wrongs that have been done; to reach out to survivors; to learn from them how to accompany those who have been abused and how they wish us to hear their stories.”

(Statement of the Union of Superiors General & International Union of Superiors General)

For our own part, we commit to do our best to listen better to survivors, humbly acknowledging that that has not always been the case. And, we pledge to implement these policies and procedures that will make us more transparent, accountable and responsive to those who have been the victims of abuse.

Therefore, as the International Association of Jesuit Universities (IAJU), we accept the mandate that has been given to us to communicate safeguarding policies, and to ask that each institution within the six regional associations examine their policies for safeguarding as part of their commitment to membership in a regional association and thus the International Association. The guidelines and policy suggestions proposed here are a template for locally adopted and published institutional policies that should be readily available to all and should form the basis of local training in implementation. The appropriate safeguarding policies at the institutional level should minimally reflect the law for safeguarding and also promote a culture of safeguarding for all vulnerable persons. Vulnerable persons at universities are those under 18, and those over 18 who are students.

(Policy Statement adopted by the Board of Directors of the IAJU in October 2020)

INTRODUCTION

As individual members of a Jesuit university community, we have a responsibility to recognize the role we play in preventing and responding to abuse. This requires consistent and proactive awareness and action. To create safe environments and ethical conduct, this has to be clearly articulated in policy documents and in the implementation and monitoring of procedures and practices.

As Jesuit universities, we are accountable to students, staff and all persons we serve in our institutions. It is our obligation, therefore, to clearly state “zero tolerance” to all forms of abuse and to provide easily accessible complaint mechanisms for communicating concerns or issues if they arise. Through actively listening, responding respectfully and accompanying victims/survivors, trust can be restored. In turn, those we serve have an opportunity to gain confidence in the accountability of their institutions.

Finally, we are committed to being transparent, and to communicate as clearly as possible. We are aware that utilizing a safeguarding and protection policy as a communication tool is an effective way to walk with the excluded, thereby promoting and raising awareness of the Society's and institutions' commitment to eliminate all forms of abuse and to create a culture of care and protection.

What follows then are minimum policy guidelines for the safeguarding of students and vulnerable persons within the care of university personnel. In cases where universities collaborate with other partners and groups, these collaborating institutions also have a responsibility to meet these minimum standards for those served in their programs.

As has been universally accepted, we recognize that the definition of a child as a person under the age of 18 years is in line with the definition of a child by the UNESCO Committee of the Rights of the Child. However, as a community committed to the safety of all, this commitment to safety includes in its concerns the vulnerability of students regardless of age. In addition, we affirm that a student, over the age of 18, has a right to be protected from physical and mental violence, injury, abuse or exploitation, including sexual abuse regardless of age.

CORE AFFIRMATIONS OF IAJU MEMBER INSTITUTIONS

- ... that the welfare of the student and vulnerable adults is paramount;
- ... that concerns or allegations of abuse are always taken seriously, investigated and acted on if appropriate;
- ... that we will support the participation of students by valuing, listening to and respecting them;
- ... that all personnel have access to, and are familiar with this policy, and know their responsibilities within it;
- ... that all personnel and students have access to information about how to report concerns or allegations of abuse;
- ... that our recruitment practices are robust enough to ensure that we will not recruit personnel, volunteers or other representatives if they pose a known risk to the safety or wellbeing of students;
- ... that all those in positions of authority (including faculty and staff) are responsible for implementation of this policy.

SAMPLE SAFEGUARDING STATEMENT

We, _____, believe all students, regardless of age, gender, disability or ethnic origin, have a right to be protected from all forms of harm, abuse, neglect and exploitation. We are committed to the protection of all children under 18, in line with the Committee of the Rights of the Child. We are committed as well to the protection of students and vulnerable adults over 18 under our protection.

We expect all our personnel to respect the age of the child as any person below 18 years. We will do everything we reasonably can to protect children and prevent harm.

It is the responsibility of all our personnel to raise any concerns regarding student safety. It is the responsibility of the university to appoint a community safety officer (CSO) to receive, investigate and report complaints.

It is the responsibility of all managers to ensure the delivery of this policy. Any concerns of abuse should be made known to the designated CSO.

The following sample policies refer to disclosures, the responsibility of the community safety officer (CSO), that is, the person responsible for following up on claims against the institution's safeguarding policy, and personnel policies that contribute to establishing a safe environment for all students.

RAISING A CONCERN OR DISCLOSURE

Anyone can raise a concern or make a complaint about something they have experienced or witnessed, or disclose information in relation to student safeguarding that they have received. Those who have disclosed a concern or allegation should receive a compassionate response from personnel and be offered access to appropriate care, advice and support. Complainants need to be listened to and heard to ensure that any allegation or disclosure of abuse is handled compassionately, effectively and professionally. Disclosing abuse takes enormous courage and calls for a high level of trust. Student abuse by its very nature can damage trust; it is therefore imperative that when a complainant is ready to tell their story, the listener responds with great sensitivity and compassion.

The following can assist in guiding any personnel receiving a concern or disclosure:

- *Keep calm and act normally; do not say or show that you are shocked.* If a student reports abuse directly to you, only ask questions to get enough information to understand the complaint (e.g. 'who, what, where, when' questions, but not 'why' questions). Do not ask the student for specific or graphic details that may re-traumatize the student. Accept what the student says. It is not your responsibility to judge or investigate an allegation.
- *Reassure the student that they have done the right thing by talking to you, and let them know you need to tell someone else.* Never agree to keep a secret: our personnel must not keep confidences when it involves safeguarding concerns about a student. Any information offered should be received on the basis that it will have to be shared with the community safety officer (CSO). This applies to all our personnel and representatives including those in counselling roles or ministry roles, lay or religious. In circumstances where a person has shared a safeguarding concern or disclosure in a conversation that was initially understood as being in confidence, the personnel involved are required to report the concern to the CSO.

RESPONDING TO A CONCERN: CORE PROCEDURES FOR THE CSO

1. Let the student know what you are going to do next, and that you will let them know what happens. If you are unsure if the concern raised is a violation of national law, refer the concern with the CSO.
2. Avoid delay. Do not dwell on allegations or suspicions of abuse or disclosures. While counseling will form part of the response, this must not be the immediate reaction. The priority is the immediate safety and welfare of the student and raising the concern to the CSO.
3. Do not directly challenge those accused.
4. Record all the details as soon as possible, while the information is still clear, and raise the concern or disclosure verbally or in writing immediately to the CSO, even if it relates to something that has happened a long time ago.
5. No students are obligated to report any incidents that have happened to them to any personnel now or in the future.

Once a concern has been raised with the CSO, a set of procedures should be followed. More detailed procedures to guide the CSO should be available as a Human Resources Policy.

Disclosures and suspicion should always be acted upon swiftly. Owing to the sensitivity of allegations relating to abuse and exploitation, all reported cases shall be treated seriously, with utmost professionalism and confidentiality in order to protect the rights of all parties involved. The procedure for responding to a concern shall be as follows:

- If possible, try to clarify if the complainant (the person who is the subject of the concern or disclosure) is below 18 – if so, please follow the national policies and procedures. If the person is 18 years and older, please refer to HR procedures. If the CSO is unclear if the person is over or under 18, please follow this set of procedures.

- If there is an urgent student protection situation (e.g. if a student is in imminent danger of abuse), then immediate protective action should be taken by the CSO and relevant senior personnel, including filling out the Student Safeguarding Concern Form (Appendix II).
- Where it is established that the allegation or disclosure constitutes a violation of national laws, the CSO should refer the case to concerned statutory authorities, such as police and local authorities, for investigations to be carried out so that legal action may be taken. The CSO's major role is to forward cases to concerned authorities if there are potential violations of the relevant laws protecting the student, but not to preside over cases. Exceptions can be made in countries where a case will not be investigated or when referring a case to the statutory authorities would most likely result in the student being put at further harm. For such cases, a safeguarding committee should be convened for further discussion.
- If the person subject of the allegation is personnel, that person may be asked to take leave or be suspended from their duties until an investigation has been completed, in order to protect all parties while an investigation is undertaken.
- Where necessary and possible, the university shall provide guidance and counselling services to help support a student who has been abused physically, emotionally or psychologically. The student may also be helped to receive care and emotional support from a hospital as a response action. Survivors and victims can choose when they would like to take up the support options available to them.
- If university personnel, after investigations have been carried out, are found to be in breach of this Policy, he/she will be subjected to disciplinary action in accordance with human resources procedures and national laws of the country of operation. Where it is established that abuse has taken place, immediate disciplinary action will be taken, which might include summary dismissal and termination of contract.
- Should the allegations be found to be false, or it is established that abuse has not occurred, we will work with the parties involved to restore their reputation and steps will be taken to sensitively reinstate the personnel without delay.

Students have a right to be heard, listened to and taken seriously. Taking account of their age and understanding, they should be consulted and involved in all matters and decisions that may affect their lives.

PREVENTING HARM TO STUDENTS: RECRUITMENT & TRAINING

Recruitment Staff: Those engaged in the recruitment process should be suitably trained and experienced to undertake this task.

Job Description: All job descriptions and their advertisements should state that all personnel will be vetted and should adhere to our student safeguarding policy and procedures.

Application Forms: Application forms should include a student safeguarding declaration and reference to our student safeguarding policy and procedures.

Reference Checking: Persons shortlisted and being considered for appointment should be asked to provide written reference(s). Referees should be asked either in the reference form or in person/by phone if there is any reason why this person shouldn't work with young adults, or whether they are aware of any allegations, convictions or investigations in relation to abuse or safeguarding. The person should not be offered a post until reference checking has taken place.

Confirm Identity: Persons shortlisted should confirm their identity with documentation and proof of relevant qualifications where available.

Police Clearance: Persons shortlisted and being considered for an appointment will be asked to provide police clearance if the service is provided nationally/locally.

**Note: Where recruitment agencies or personnel are subcontracted, the aforementioned procedures should be scrutinized in order to ensure they are in compliance with this policy.*

Self-Disclosure & Acceptance: Shortlisted candidates will be given the Student Safeguarding Policy and should sign the Safeguarding Self-Disclosure Form (Appendix I) & Acceptance Form (Appendix II). For new personnel, this should be done prior to being issued their offer letter.

Agreement to Adhere to the Policy: All new personnel, without exception, should sign the Acceptance Form and agree to abide by it prior to the offer letter being issued. In the case of the Acceptance Form being newly introduced within the organization, all current personnel already in employment will be requested to sign it. If any personnel refuse to sign the Acceptance Form, and if their duties involve direct contact with students or they pose a risk to any students under their care, they may be removed for the post, whether paid or voluntary.

Appointment: Upon appointment, the personnel should be:

- Given their job description, which should contain the statement that the person will adhere to the student safeguarding policy and procedures
- Given an induction by a supervisor to the policy and ensure they fully understand how to share any concerns.

Probationary Period: Consider the use of probationary periods of employment to ensure suitability once in post.

Training

All members of the university should receive training regarding the safeguarding policy.

Induction: An initial induction on the Student Safeguarding Policy and Procedures will be done following the appointment of personnel and within two weeks of commencing the post. All personnel of the university, whether directly or indirectly dealing with students, shall receive training or briefing regarding their obligations under the policy not to harm students, and to report allegations of student abuse to the CSO.

Regular Trainings: Regular trainings will be facilitated by the CSO to all personnel on student safeguarding to ensure personnel are aware of their responsibilities, the process for reporting a concern, disciplinary actions, and their role in strengthening monitoring systems. Records of trainings provided to personnel will be kept by the CSO.

Additional Training: Any personnel who require specific training or upskilling in relation to their work (if it improves the quality of student safeguarding and protection services) should receive support in doing so. This may apply to external training courses or attendance at conferences/forums on student protection and students' rights.

Universities that provide student housing: Universities with student housing should have clear guidance for the access of non-residents, especially personnel, and non-university visitors. Guidelines should be developed for explaining university policies to students and personnel working with students in housing.

Campuses with Religious Housing: Religious communities are special places of hospitality. Policies that guarantee the privacy of those religious and the inclusion of guests should be clarified and posted for all guests to see.

Media, Audio & Visual Recordings: Every student has the right to privacy, and to protection from all forms of exploitation. If any audio or visual recordings involve interviewing a student, always ensure that the student is at no risk of being endangered, or adversely affected. To ensure their privacy, do not use the student's full name, avoid giving location where the student lives, and seek the student's permission for publication of recordings. Still photographs and videos must never be demeaning, or disrespectful of the dignity of the persons portrayed. The rights, safety and wellbeing of the persons being portrayed are always to be protected. The gratuitous portrayal of extreme suffering is always to be avoided. Editing should maintain the integrity of the photographic and video images' content and context. No changes should be made that distort the context of the image, or that make a situation look worse than it is.

People should always be adequately clothed. They should never be portrayed in poses that could be regarded as sexually suggestive, erotic or obscene. Images which are not intended to be sexual can be 'sexualized' when viewed and/or shared by certain individuals, particularly online.

EXPECTATIONS OF OUR COLLABORATING INSTITUTIONS

We expect that collaborating institutions of the universities operate effective safeguarding procedures. If we receive a student safeguarding concern about a collaborating institution, we will inform them and expect the collaborating institution to respond quickly and appropriately. We will assist the collaborating institution to ascertain its obligations under local law to refer the matter to the police or other statutory authorities for criminal investigation. Where appropriate, we can work with the collaborating institution to address the issue through an appropriate independent investigation, which should not interfere with any criminal investigation being conducted by statutory authorities.

If the outcome is that student abuse has occurred, ongoing work with the collaborating institution cannot involve the perpetrator(s) concerned. If there is reason to believe that an allegation of abuse has been dealt with inappropriately by a collaborating institution, that institution risks withdrawal of future collaboration. We also expect collaborating institutions to inform us of any safeguarding incidents they are dealing with where these have not come to our attention.

COMMUNICATING THE SAFEGUARDING MESSAGE

Access to the Policy: All IAJU members will ensure that a hard copy of the safeguarding policy will be available in student, faculty and staff manuals. The policy will be translated into local languages where possible. All personnel with active e-mail addresses will be e-mailed this policy.

Sensitization: All students will be made aware of their rights, what constitutes abuse, and exploitation and neglect against them. The Policy will be communicated to them regarding whom they should report to, or seek advice from, if they feel they have been violated or offended.

Monitoring Compliance: IAJU institutions should consider how safeguarding is being effectively implemented and whether any training is needed for personnel. Resources will be made available for the full implementation of the policy: this will form the basis of monitoring progress.

Records will be kept tracking:

- The numbers of Self-Disclosure and Acceptance Forms completed, comparable with the number of personnel appointed.
- Inductions and trainings provided in student safeguarding, numbers attended and dates.
- All safeguarding concerns and disclosures reported to the CSO, which will be stored on the university premises and kept in a safe and confidential location.
- Job descriptions and advertisements to confirm if they all contain the commitment to student safeguarding policy.

All IAJU institutions should review, at least every three years, new processes, changes in legislation, guidelines and practices, which will be incorporated in accordance with lessons learned.

AUTHORIZATION

This policy has been reviewed and approved by the following authorizing persons. All updated versions or amendments of the policy will be circulated to all personnel.

Policy created [Insert Date]: _____

Policy to be reviewed [Insert Future Review Date]: _____

Sign-off by Community Safety Officer: _____

Name: _____

Role other than CSO: _____

Signature: _____

Date: _____

APPENDIX I: SAFEGUARDING SELF-DISCLOSURE FORM

Confidential Self-Disclosure Form: (Name of university) is committed to the protection of all students and vulnerable adults, and all students under the age of 18 in line with the Committee of the Rights of the Child, the monitoring body for the UN Convention on the Rights of the Child, which has encouraged States to review the age of majority if it is set below 18. In accordance with this university policy, persons working or volunteering with (name of university) abide by good practice and agree to keep students safe from harm when relating and working with them. In addition, we ask that all persons declare the following:

Have you ever been convicted of a sexual or safeguarding offence or are subject to an on-going sexual or safeguarding investigation by a statutory authority or education body? Yes _____
No _____

If yes, please state below the nature and date(s) of the offence(s), case(s) or allegation(s):

Have you ever been the subject of disciplinary procedures or been asked to leave employment or voluntary activity due to inappropriate behavior toward a child or an adult?

Yes _____ No _____

Full Name (Print): _____

Any name previously known by: _____

Address: _____

Date of Birth: _____ Place of Birth: _____

Declaration: I understand that, if it is found that I have withheld information or included any false or misleading information above, I may be removed from my post, whether paid or voluntary, without notice. I understand that the information will be kept securely by the works/project. I understand that if an allegation is made against me, I must inform my manager immediately. I hereby declare the information I have provided is accurate.

Signed: _____ Date: _____

APPENDIX II: SAFEGUARDING ACCEPTANCE FORM

I, _____ as personnel affiliated with the university agree that I have taken time to read and understand the student safeguarding policy and will abide by the policy and statements stipulated below. I have had the opportunity to ask questions and seek clarification on any points that were not clear to me.

I will: 1. Treat all students equally, observing their personal dignity regardless of their age, gender, language, tribe, religion, disability, opinion or other status. 2. Immediately report concerns or allegations of student abuse in accordance with our student safeguarding policy. 3. Apply the following self-assessment questions regarding my professional boundaries:

- Am I dealing in a different manner with a student than with others under the same circumstances?
- Is my dress/availability/language different from normal with a particular student?
- Would I do or say this to a student if a colleague were present?
- Would I condone my conduct if I observed it in another adult?

I will never: 1. Put a student at risk of harm through inaction (including failure to report a concern). 2. Condone or participate in any student-related activity which is illegal, exploitative, unsafe or abusive (this includes behavior by other students). 3. Use computers, mobile phones, video or digital images to exploit or harass students, or to access child pornography through any medium. 4. Use language or behavior toward students that is harassing, abusive, sexually provocative or that is intended to shame, humiliate or emotionally abuse or place a student at risk of abuse. 5. Hit or otherwise physically assault a student irrespective of cultural norms, including as discipline. 6. Abuse my position to withhold professional assistance or give preferential treatment, gifts or payment of any kind to a student, or another person in relation to a student, in order to solicit any form of advantage or sexual favor from a student. 7. Seek to make contact or spend time with any student with whom I come into contact as part of my work, except as part of the designated activities set out in my role. 8. Do things of a personal nature for a student with whom I come into contact as part of my work, that the student can do for themselves (e.g. toileting, bathing, dressing). 9. Visit a student's home alone; invite unaccompanied students into my residence / accommodation; spend excessive time alone with students away from others; share a bedroom with or sleep close to an unsupervised student during a field visit. 10. Have sexual intercourse or participate in any form of sexual activity, including paying for sex, with any person who is a student in my institution; seduce nor be seduced into any form/act of sexual activity with students.

Signature: _____ Role: _____
Date: _____