School Harassment Policy

Prohibition on Harassment in any Form

Poly Prep believes that a respectful, sensitive, and safe working and learning environment for all members of the Poly community is of utmost importance. To maintain such an environment, all students, students’ families, staff, and employees of contracted service providers are expected to adhere to the highest standards of decency, goodwill, mutual respect, empathy, and sensitivity to others. While Poly values open discussion about religious, political, and other personal beliefs and values, it expects all such discussion to be engaged in a respectful manner and in a way that adheres to the standards set out in this Policy. Poly does not tolerate any behavior whatsoever that violates these standards.

Specifically, Poly prohibits any and all forms of harassment, whether such harassment takes the form of physical, verbal, or electronic interaction. Prohibited harassment includes acts of discrimination based upon actual or perceived race, religion, religious or spiritual practices, color, national origin, ancestry, citizenship, immigration status, handicap, disability, physical body type, weight, marital status, family structure, economic situation, neighborhood of residence, gender, gender identity, sexual orientation, veteran status, age, sex, creed, genetic predisposition, disease carrier status, or any other basis protected by federal, state, or local law.

Prohibited harassment includes behaviors commonly recognized as bullying, hazing, sexual harassment, and sexual abuse/assault. All are prohibited by this Policy.

Definition of Bullying

Poly Prep defines bullying as some form of physical, verbal, demonstrative, or electronic harassment that has the effect of demeaning and hurting its victims or others in the Poly community, regardless of its intended result or effect. It can be of a sexual nature or otherwise. It can take place in person, over the telephone, through on-line communication, or any other means that communicates such harassment. It can involve a one-on-one situation or a group situation. Both adults and children can be bullied or be the bully; this Policy applies to both adults and children, whether in a classroom, at a theatre, on a playing field, or at any other athletic or extra-curricular venue and anywhere else where such bullying could have a substantial impact on the Poly community.

Examples of bullying include, but are not limited to the following behavior, whether engaged in by an adult or a child:

- Pushing, tripping, kicking, or hitting
- Damaging, hiding, or taking property
- Excluding from a group or activity to purposely hurt someone
- Threats of physical harm
- Calling someone offensive or demeaning names, such as "stupid" or "idiot"
- Screaming profanity at someone
- Humiliating someone in a classroom, theatre, playing field, or other athletic or extra-curricular venue
- Using bigoted, sexist, or discriminatory language, whether a member of the relevant subgroup is present or not
- Making jokes that involve offensive stereotypes
- Using homophobic language to address another
- Attacking a person's self-esteem
- Posting on-line mean, offensive, or demeaning comments or images
- Writing mean, offensive, or demeaning comments or images on School property (including cyber bullying)
- Creating fake web pages or profiles, or impersonating another on-line or
otherwise in a way that subjects that other person to ridicule

- Spreading mean and hurtful rumors
- Making fun of or harassing someone, or a group of people, about his, her or their actual or perceived religion, religious practices, spiritual beliefs, or practices
- Making fun of or harassing someone, or a group of people, about his, her or their actual or perceived race, color, national origin, ancestry, citizenship, or immigration status
- Making fun of or harassing someone, or a group of people, because of his, her or their actual or perceived disability, physical body type, or weight
- Making fun of or harassing someone, or a group of people, about his, her or their actual or perceived family structure, economic situation, neighborhood of residence, gender or gender identity, or sexual orientation

BULLYING IN ANY OF ITS FORMS IS PROHIBITED AT POLY.

Definition of Hazing

Poly Prep defines hazing as any activity expected of someone joining a group, grade, or the School itself, or expected of someone to maintain status in a group, grade, or the School that humiliates, degrades, or risks emotional and/or physical harm to the individual or the Poly community, regardless of the person's willingness to participate and regardless of its intended result or effect. Prohibited hazing can take place in person, over the telephone, through on-line communication, or any other means that communicates such harassment. It can involve a one-on-one situation or a group situation. Both adults and children can be hazed or be the hazer; this Policy applies to both adults and children, whether in a classroom, at a theatre, on a playing field, or at any other athletic or extra-curricular venue and anywhere else where such hazing could have a substantial impact on the Poly community.

Examples of hazing include, but are not limited to, an adult or a child requiring someone to:

- Submit to embarrassing, hurtful, or demeaning conduct at a tryout or initiation for a club, team, or other activity
- Suffer pranks continually aimed at one particular member of a club, team, or other activity
- Ingest alcohol
- Submit to physical striking, beating, scratching, burning, branding or to engage in self-mutilation, or requiring one to commit such acts upon another
- Submit to acts of sexual abuse/assault
- Suffer abusive and demeaning speech
- Engage in acts of personal servitude
- Proceed through a gauntlet, e.g., on a bus or in a locker room
- Suffer sleep deprivation
- Restrict his/her personal hygiene
- Wear humiliating attire in public
- Appear in public in humiliating forms of undress
- Engage in indecent exposure
- Engage in illegal activity
- Engage in physical activity that is dangerous
- Submit to being tied up or abducted, or requiring one to do the same to another
- Expose his or herself to extreme weather conditions without appropriate protection
- Consume vile substances or allow such substances to be smeared on the body
- Engage in any degrading or humiliating act
- Engage in the harassment of another whether face-to-face, over the telephone, through on-line communication, or through any other means of communication

HAZING IN ANY OF ITS FORMS IS PROHIBITED AT POLY.

Definition of Sexual Harassment

Poly Prep defines sexual harassment as unwelcome or unwanted sexual advances, requests for sexual favors, or other verbal, physical, demonstrative, or electronic conduct or
communication of a sexual nature, especially when:

1) Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment or educational experience; or

2) Submission to or rejection of such conduct is used as the basis for an employment, academic, or other School-related activity decision affecting such individual; or

3) Such conduct has the purpose or effect of unreasonably interfering with an individual's work or academic performance or participation in a School program or extra-curricular activity; or

4) Such conduct has the purpose or effect of creating an intimidating, hostile, or offensive working, learning, or campus environment.

In addition, Poly considers any type of sexual advance, request for sexual favors, or other verbal, physical, or electronic conduct or communication of a sexual nature made by an adult staff member, whether full or part-time, or an adult employee of a contracted service provider, towards a student, whether welcomed by that student or not, sexual harassment and therefore a violation of this Policy.

Sexual harassment may be found in a single incident or in a series of incidents. It can take place in person, over the telephone, through on-line communication, or any other means that communicates such harassment. It can involve a one-on-one situation or a group situation. Both adults and children can be harassed or be the harasser; this Policy applies to both adults and children, whether in a classroom, at a theatre, on a playing field, or at any other athletic or extra-curricular venue and anywhere else where such harassment could have a substantial impact on the Poly community. It may occur between two adults, an adult and a student, or between two students. The victim or harasser may be female or male, and it may occur between people of the same or different gender.

Examples of behavior that may constitute sexual harassment, whether engaged in by an adult or a child, include, but are not limited to:

- Requests or demands for sexual favors accompanied by implicit or explicit promised rewards or threats concerning an individual's employment or educational status
- Intentional touching or supposed inadvertent, physical contact of a sexual nature, such as patting, grabbing, or brushing up against someone in a sexual manner
- "Pantsing," "wedgies," and "bra-snapping"
- Jokes of a sexual nature made to or in front of someone who does not welcome hearing them
- Suggestive comments about physical attributes, especially those related to sexual or intimate parts of the body
- Negative statements or disparaging remarks regarding one's gender, whether male or female, even if the comments are not sexual in nature
- Comments or questions about sexual experience
- Spreading rumors of a sexual nature
- Gestures of a sexual nature
- Leering or engaging in catcalls
- Repeated requests for a date made after the person requested has said, "no"
- Implicit or explicit requests to engage in sexual behavior, whether with the requestor or with the requestor's friend
- Demands for sexual activity or other less overt coercive efforts to obtain sexual favors
- Exposing another person to sexually explicit behavior, drawings, pictures, objects, or writings
- Photographing, videotaping, or making any other visual or auditory recording of sexual activity or sexual or intimate parts of a person's body without his or her knowledge and consent and, in addition, if the person being photographed or
recorded is a student, doing so even with his or her consent

- Sending via electronic means images of sexual activity or sexual or intimate parts of the body, i.e., "sexting"
- Rating individuals based on physical attributes or appearance
- Engaging in inappropriate displays of public affection

All of the above behaviors may constitute sexual harassment if they are unwelcome or unwanted.

SEXUAL HARASSMENT IN ANY OF ITS FORMS IS PROHIBITED AT POLY.

Definition of Sexual Abuse/Assault

Poly Prep defines sexual abuse/assault as intentional physical contact with a sexual or intimate part of the body without consent. It includes various forms of sexual intercourse, as well as lesser forms of sexual touching. Sexual or intimate body parts include, but are not limited to, breasts, buttocks, genitals, and upper thighs. Lack of consent occurs when one is physically forced or verbally intimidated into doing something sexual, or submitting to a sexual act, or when one has explicitly indicated a lack of consent, or when the circumstances make it clear that consent has not been given. It can also occur when someone is too intoxicated to say "no" or resist, or has fallen asleep and can therefore not consent. In addition, it may occur in other situations in which someone is deemed to be physically or mentally incapable of giving valid consent, whether due to the use of intoxicants or any other reason.

Lack of consent also occurs when one of the persons involved in the sexual act is under 17 years of age. Children under 17 in the State of New York cannot legally consent to having sex or sexual contact with an adult. Therefore, any sexual contact between a student under 17 and an adult is a crime that will be reported to the police.

In addition, any sexual or romantic conduct between an adult Poly staff member and a present Poly student of any age, even if 17 or older, and even if consented to or welcomed by the student, is strictly prohibited by this Policy and will result in dismissal of the adult involved. This includes kissing, caressing, and other romantic or sexual touching. This behavior may not be engaged in at any time a child is a student at Poly, nor for one year post-date of a student's high school graduation. In addition to the examples listed below, this Policy prohibits "sexting" between students and staff and the showing of pornography to any student by a Poly staff member. Both will result in the dismissal of the adult involved and the reporting of such conduct to the appropriate authorities.

Examples of sexual abuse/assault include, but are not limited to, the following behavior whether engaged in by an adult or a child:

- Grabbing, pinching, or fondling another person's buttocks, breasts, or genital area, whether over or under clothing, without consent as defined above
- Rubbing one's genital area up against another person, whether over or under clothing, without consent as defined above
- Touching another person with one's genitals without consent as defined above
- Engaging in sexual behavior with someone too intoxicated to give informed consent
- Physically or verbally intimidating someone to engage in a sex act, whether done so expressly or impliedly
- Physically forcing someone to engage in a sex act
- Any sexual or romantic contact or behavior between a Poly staff member and a Poly student

SEXUAL ABUSE/ASSAULT IN ANY OF ITS FORMS IS PROHIBITED AT POLY.

Harassment Policy — Where Applicable

Poly's policy prohibiting harassment applies to both Poly campuses and their immediate environs, to all School-sponsored and affiliated activities and events, whether on or off-campus, to the use of communication devices, whether Poly or student-owned, and to any form of transportation provided by the School, or private transportation if such is used to go to or from the School or a School-sponsored extra-curricular activity or event. In addition, Poly reserves the
right to discipline those in the Poly community who engage in harassment of other Poly community members at any location or time, if such harassment causes a substantial disruption to the School community. Poly respects the free speech rights of its staff and students but will not tolerate speech directed at, or about, a member or members of the Poly community that is obscene, libelous, or slanderous, that incites violence, invades the rights of others, or contributes to a substantial disruption of the Poly School community. Thus, even if such speech originates off-campus, if it comes to the attention of Poly staff, appropriate action will be taken to maintain the respectful, sensitive, and safe working and learning environment at Poly. With respect to interaction of Poly staff and students, this Policy applies at all times in all locations.

In addition, harassment in hiring or any other employment decision once hired is strictly prohibited by this Policy.

**Harassment Policy — To Whom Applicable**

Poly's policy prohibiting harassment applies to all Poly students, students' families, faculty, administration, and other staff, whether full-time or part-time, and to employees of contracted service providers. All such individuals will receive this Policy in written form and will acknowledge receipt thereof in writing.

**Violations of Harassment Policy — Expected Response**

All members of the Poly community who feel themselves victimized by a harasser are encouraged to tell the harasser to cease his or her harassment and thereby make it perfectly clear to the harasser that his or her behavior is offensive and unwelcome. In addition, anyone in the Poly community who witnesses another being victimized by a harasser is encouraged to intervene and tell the harasser to stop his or her offensive behavior. In recognition of the fact that communication about the offensiveness of a harasser's behavior by his or her peers is often the most effective way to end the harassment, Poly expects bystander intervention by members of the student body. In addition, Poly requires all staff to similarly intervene in any incident of harassment that they observe, as a failure to do so has been shown to make victims of harassment feel powerless and therefore less likely to report and cause their victimizers to become more emboldened and continue, and often increase, their harassing conduct.

All members of the Poly community who learn of an incident of harassment, or have reason to believe such an incident has occurred, should report such to School authorities, regardless of who the harasser may be, so additional action can be taken, and all Poly staff are required to report in these circumstances. School intervention is often the most effective way to end harassment, and it is therefore expected that all Poly community members will do their part to see that School authorities are made aware of any violations of Poly's Harassment Policy. A "reason to believe" that a violation of this Policy has occurred may be the result of disclosure of an incident by a person with knowledge of its occurrence or direct observation of the incident itself. In any case in which someone with knowledge of such an incident is afraid to report it to a Poly staff member, he or she should avail themselves of one of the outside reporting alternatives listed below.

At times, students are reluctant to come forward and report violations of harassment policies, especially when they involve sexual misconduct, because doing so would reveal the student's own alcohol or drug use, or other breach of the School's code of student conduct. Because the health and safety of Poly's students is the School's paramount concern, to minimize any hesitation a student may have to report a violation of the Harassment Policy, while not overlooking violations of its code of student conduct, including the ban on students' use of drugs and alcohol, the School will place great weight on the positive impact of reporting an incident in deciding if any action is appropriate for the reporter's breach of appropriate standards of behavior.

Retaliation against anyone who, in good faith, reports a violation or suspected violation of Poly's Harassment Policy, or who participates in an investigation of a complaint, is strictly prohibited and will subject the individual who engages in such reprisal to disciplinary action. Poly considers such retaliation as serious a violation of this Policy as an act of prohibited harassment. For more on Poly's anti-retaliation policy, see page 13 of this Handbook.
Violations of Harassment Policy — Reporting Procedures

STUDENTS, PARENTS, AND OTHER NON-POLY STAFF CONCERNED ADULTS:

1) Reporting Within Poly: Students, parents and other non-Poly staff concerned adults should report violations and suspected violations of this Policy as soon as possible following an incident(s) so such violations can be effectively investigated and addressed. However, there is no time limit on when such a report may be made, and whenever such a report is made, it will be fully investigated and addressed to the best of the School's ability at such time. Any student, parent of a student, or other non-Poly staff concerned adult who wishes to report a violation of Poly's Harassment Policy may do so by speaking to any faculty or staff member at Poly with whom they are comfortable. Such faculty or staff member will then be responsible for seeing that the student, parent's, or other non-Poly staff concerned adult's report is passed along to the appropriate Poly administrator for investigation and other appropriate action. In addition, reports may be made in writing via hard copy, email, or any other form of written communication. Students, their parents, and other non-Poly staff concerned adults are strongly encouraged to report all violations and suspected violations of Poly's Harassment Policy regardless of who the perpetrator may be. The reporter's identity and the information he or she reports will only be shared with those necessary to appropriately address the situation.

Retaliation of any kind against a person or persons who have made such a report will not be tolerated and will subject anyone who engages in it to disciplinary action.

2) Outside Reporting: In addition, any student, parent, or other non-Poly staff concerned adult who is not comfortable reporting a violation or suspected violation of the Harassment Policy to a Poly staff member may call any of the following outside individuals to make such a report:

a. Poly Board of Trustee members Susannah Furfaro or Nicholas Gravante at 718-630-5128 or email at sfurfaro@polyprep.org or ngravante@polyprep.org

b. Laura Kirschstein, J.D., of T&M Protection Resources, at 212.916.8852, or via email at lkirschstein@tmprotection.com

3) Anonymous Reporting: Finally, should any student, Poly parent, or other non-Poly staff concerned adult wish to report a violation of the Harassment Policy anonymously, they may do so by calling or emailing Laura Kirschstein, J.D., of T&M Protection Resources, at the phone number or email listed above. Regardless of how a violation is reported, it will be addressed and investigated to the extent possible given the limitations inherent in investigating anonymous reports. Such anonymous reporter may decide to reveal his or her identity at any later date.

FACULTY & STAFF

1) Reporting Within Poly: All Poly faculty and staff are under an obligation to immediately report any and all violations or suspected violations of the Harassment Policy that come to their attention and they should do so to any manager at the School with whom they feel comfortable or to the Director of Human Resources, the School Psychologist, or the School Nurse. Managers and the Director of Human Resources, the School Psychologist, and the School Nurse when informed of an alleged violation are obligated to and responsible for seeing that the reported violation is promptly passed along to one of the following people: their Division Head, Manager, or the Director of Human Resources. Upon receiving a report, the above-listed individuals must then promptly, but no later than 24 hours after receiving the report, bring the report to the attention of the Assistant Head of School, Finance and the Head of School. Should the allegation
The identities and the information reported pursuant to this Policy will only be shared with those necessary to appropriately address the situation. Retaliation of any kind against a person or persons who have made such a report will not be tolerated and will subject anyone who engages in it to disciplinary action. See page 13 of this Handbook for a fuller explanation of Poly's anti-retaliation Policy.

If the violation or suspected violation involves an act of physical or sexual abuse/assault, the report must be made immediately upon coming into possession of the information that such an act has occurred or is suspected of having occurred and the report should be made directly to the Head of School and the Assistant Head of School, Finance. If either of these people is not immediately available, such report should also be made to one of the following:

a. Poly Board of Trustees members Susannah Furfaro or Nicholas Gravante at 718-630-5128 or email at sfurfaro@polyprep.org or ngravante@polyprep.org

b. Laura Kirschstein, J.D., of T&M Protection Resources, at 212.916.8852, or via email at lkirschstein@tmprotection.com

In addition, you should inform your Division Head or Office Manager, unless that person is the subject of the report.

2) Outside Reporting: In addition, any Poly faculty or staff member who is not comfortable reporting a violation or suspected violation of the Harassment Policy to the Poly administration may call any of the following outside individuals to make such a report:

a. Poly Board of Trustee member members Susannah Furfaro or Nicholas Gravante at 718-630-5128 or email at sfurfaro@polyprep.org or ngravante@polyprep.org

b. Laura Kirschstein, J.D., of T&M Protection Resources, at 212.916.8852, or via email at lkirschstein@tmprotection.com

EMPLOYEES OF CONTRACTED SERVICE PROVIDERS

1) Reporting Within Poly: All employees of contracted service providers are under an obligation to promptly report any and all violations or suspected violations of Poly's Harassment Policy that come to their attention in any manner to any manager at the School with whom they feel comfortable or to the Head of Campus Operations or Director of Human Resources. Upon receiving a report, the above-listed individuals must then promptly, but no later than 24 hours after receiving the report, bring the report to the attention of the Assistant Head of School, Finance and the Head of School. Should the allegation involve either the Assistant Head of School, Finance or the Head of School, then such person should not be notified, but rather the second notification should be made to one of the Poly Board of Trustees members listed below.

This obligation is mandatory regardless of whether the violation or suspected violation involves another employee of a contracted service provider, a Poly faculty or staff member, or a
involves another employee of a contracted service provider, a Poly faculty or staff member, or a student, as victim or perpetrator. This obligation exists even if an employee of a contracted service provider is the victim him or herself of the harassment and a failure to follow this procedure may affect his or her right to pursue legal action.

The identities and the information reported pursuant to this Policy will only be shared with those necessary to appropriately address the situation. Retaliation of any kind against a person or persons who have made such a report will not be tolerated and will subject anyone who engages in it to disciplinary action. See page 13 of this Handbook for a fuller explanation of Poly's anti-retaliation Policy.

If the violation or suspected violation involves an act of physical or sexual abuse/assault, the report must be made immediately upon coming into possession of the information that such an act has occurred or is suspected of having occurred and the report should be made directly to the Head of School and the Assistant Head of School, Finance. If either of these people is not immediately available, such report should also be made to one of the following:

a. Poly Board of Trustee member members Susannah Furfaro or Nicholas Gravante at 718-630-5128 or email at sfurfaro@polyprep.org or ngravante@polyprep.org.

b. Laura Kirschstein, J.D., of T&M Protection Resources, at 212.916.8852, or via email at lkirschstein@tmprotection.com

2) Outside Reporting: In addition, any employee of a contracted service provider who is not comfortable reporting a violation or suspected violation of the Harassment Policy to their Poly manager or the Poly administration may call any of the following outside individuals to make such a report:

a. Poly Board of Trustee member members Susannah Furfaro or Nicholas Gravante at 718-630-5128 or email at sfurfaro@polyprep.org or ngravante@polyprep.org.

b. Laura Kirschstein, J.D., of T&M Protection Resources, at 212.916.8852, or via email at lkirschstein@tmprotection.com

Violations of Harassment Policy — Retaliation Prohibited

Retaliation against anyone who in good faith reports a violation or suspected violation of Poly's Harassment Policy or who participates in an investigation of a complaint is strictly prohibited and will subject the individual who engages in such reprisal to disciplinary action. Poly considers such retaliation as serious a violation of this Policy as an act of prohibited harassment. Prohibited “retaliation” includes threats, intimidation, harassment, and other adverse action threatened, expressly or impliedly, or taken against anyone who reports a violation or suspected violation of Poly's Harassment Policy or who participates in an investigation of a complaint. The prohibition against retaliation applies not just to the person(s) accused, but also to their friends and anyone else in the Poly community who might be inclined to retaliate on the accused's behalf. Poly strongly encourages anyone who becomes aware of such retaliatory behavior to report it to School authorities and all staff and employees of contracted service providers are under a business duty to do so.

Violations of Harassment Policy — Knowing False Reports Prohibited

Someone who knowingly makes a false report of a violation or suspected violation of the Harassment Policy is also subject to disciplinary action.

Violations of Harassment Policy — Handling of Reported Complaints

After receiving a complaint, the Head of School, in consultation with whomever else he or she deems appropriate, will make decisions regarding how the School will proceed going forward. These decisions will include, but not be limited to, how and when the child's family will be notified (if a child is involved in the alleged incident), whom else at the School should become privy to the information, whether the police should be involved, how the situation should
be handled at the School moving forward, and how family and staff members should be communicated with in the future regarding the situation reported.

If the report involves physical or sexual abuse of a child by a Poly faculty or staff member, or an employee of a contracted service provider, the Head of School or his designee will call law enforcement, and any other agency required by law.

A prompt, thorough, and impartial investigation will ensue by appropriate individuals who will be selected based upon the nature of the complaint and the individuals involved. Both the reporter, if he or she has identified him or herself, and the person who is the subject of the report, if this person has been identified by the reporter, will be interviewed separately about the reported facts. Both will be advised of the prohibition against retaliation for making such a complaint and cooperating in an investigation. Others who may have relevant knowledge may also be questioned and they too will be advised of the prohibition against retaliation for making such a complaint and cooperating in an investigation. Poly expects all members of its community to cooperate fully in any such investigation. Faculty and staff members and employees of contracted service providers are under a business duty to so cooperate. Confidentiality will be maintained to the extent possible given the facts and circumstances of the complaint and the need to do a fair and thorough investigation.

Nothing in this Policy is intended to limit the options of any person who feels that he or she has been subject to unlawful harassment or discrimination. Such a person may at any time in addition to participating in Poly's complaint procedure pursue his or her rights with an outside agency, governmental entity, or legal counsel.

At the conclusion of the investigation, and after the decision has been made regarding what if any disciplinary or other remedial action is to be taken, the alleged victim and alleged perpetrator will be informed about the disposition of the matter. If either of the parties is dissatisfied with the handling or outcome of the investigation, remedy may be sought by contacting the Head of School.

Communication of any information regarding the matter to others in the Poly community, whether that be staff, employees of contracted service providers, the student body, or parents, will be decided on a case-by-case basis with all due respect being given to issues of privacy, confidentiality, and the emotional and physical well-being of all involved.

**Violations of Harassment Policy — Disciplinary Decisions**

Disciplinary decisions will be based upon the facts and circumstances of each case. The accused's prior conduct at Poly, both good and bad, will be considered, as will the wishes of the victim; however, the latter will not be controlling as Poly must act in a manner that protects the best interests of the entire Poly community. Among the disciplinary actions that may be taken should a violation of the Harassment Policy be found to have occurred after investigation are the following: a verbal warning, written reprimand, parental notification, loss of privileges, withholding of promotion, demotion, reassignment, counseling, sensitivity training, probation, suspension, expulsion, dismissal, or notification to local or state authorities.

In addition to disciplinary action with regard to the perpetrator, the School will consider what, if any, remedial measures should be taken with regard to the School as a whole to prevent similar offenses from occurring in the future.

Records will be kept of all such investigations and such records will include, but not be limited to, information about the allegation as gathered from the reporter, the person reported, and others interviewed. In addition, the decision reached regarding appropriate disciplinary action, and any other relevant follow-up engaged in by the School will be documented. All such records will be maintained by the School indefinitely. With regard to records kept in students' and staff members' files, a record will be made each time a student or staff member is involved in an investigation related to this Policy. If disciplinary action is taken, it will be noted in the disciplined person's file. With regard to students, whether it should become part of the student's permanent file will be decided by Poly on a case by case basis and will involve considerations related to the seriousness of the offense and the disciplined student's prior conduct at Poly.
Violations of Harassment Policy — Review of Handling of Reported Complaints

To ensure the Policy is being complied with, Poly will have all files regarding reports of Policy violations reviewed by the two Board of Trustee members listed in the Reporting Procedures on a yearly basis.

Reporting of Child Abuse & Maltreatment

Mandatory reporting to the State: Under Section 413 of the New York State Social Services Law, all School officials, including, but not limited to, administrators, faculty, guidance counselors, and health care professionals employed by Poly Prep are "mandated reporters" who have an affirmative duty to report when they have "reasonable cause to suspect" that a child has been abused or maltreated by a parent or legal guardian or someone else legally responsible for their care and such information has come to the staff member's attention in the course of his or her official or professional capacity. Such information may come to a staff member's attention in a number of ways: by disclosure from a child, a parent, legal guardian, or another adult, or from something the staff member has themselves observed. "Abuse and maltreatment" includes physical abuse, sexual abuse, emotional abuse, and neglect.

"Mandated reporters," as defined above, must call the New York State Central Registry (SCR) at 1 -800-635-1522 upon having such "reasonable cause." This is a personal duty of the person who has such reasonable cause and is not satisfied by telling a manager at the School. Consulting with a manager at the School before making such a call, however, is allowable; and indeed advisable, but the consent or approval of such a manager is never a requirement for making a call to the SCR.

Poly staff is reminded that the Poly administration is always available to discuss such situations, offer advice and support, and be present should a call to the SCR need to be made. In addition, Poly's health care professionals are available to assist in any way they can. Oral reports to the SCR hotline must be followed up within 48 hours with a written report using form LDS-2221 -A which can be obtained from the New York State Office of Children's Services (OCFS) website at www.ocfs.state.ny.us.

Required reporting to Poly administration: In addition to the requirements of New York State law as set out above, Poly faculty and staff and employees of contracted service providers have a duty under Poly Prep policy to immediately report their suspicions of child abuse or maltreatment committed by anyone, not just a parent, guardian, or other person legally responsible for the child's care, to one of the individuals listed in the Reporting Procedures above, regardless of whether a call has already been made to the State hotline.

Penalties for failure to report: Failure to report a suspected case of child abuse or maltreatment, as defined in the Family Court Act above, is a class A misdemeanor punishable by up to a year in jail and or a fine of $1000. In addition, it is a violation of Poly policy and is therefore an offense for which an employee may be fired.

Immunity from Liability for Mandated Reporters: Under New York State Social Services Law, any School employee who in good faith makes a report to the State hotline has immunity from liability, civil or criminal, which might otherwise result by reason of such action.

Preservation of Evidence: In any situation in which a child has visible physical trauma, staff should advise their Division Head, Dean of Students or the Head of School that such exists at the time they first report the suspected abuse to such individual and the Division Head, Dean of Students or the Head of School will then be responsible for seeing that color photographs of such apparent injuries are taken and, if medically indicated, will see that the child has a radiological examination.

Additional responsibilities for School Health Care Providers: School health care professionals shall notify the appropriate police authorities or the local child protective service to take custody of any child such School health care professional is treating whether or not additional medical treatment is required, if such health care professional has reasonable cause to believe that the circumstances or condition of the child are such that continuing in his or her place of residence or in the care and custody of the parent, guardian, custodian, or other person responsible for the child's care presents an imminent danger to the child's life or health.
Training

All Poly faculty and staff will be required to take New York State Mandatory Reporting online training every three years and will be required to provide the School with a copy of the Certificate of Completion issued by the State. In addition, training on this Policy and relevant substantive subject matter will be done for all students, their families, faculty, and staff. Contracted service providers will be required to provide all of their employees who they send to work at Poly with a copy of Poly's Harassment Policy.

Conclusion

Poly has developed this Harassment Policy to ensure that all members of its community can learn and work in a respectful, sensitive, and safe environment. It expects all members of the Poly community to not only adhere to all aspects of this Policy, but to do everything they can to support its goals. Only with the support and cooperation of all in our community can we achieve the type of environment that this Policy is designed to achieve.

School Harassment Policy Updated January 1, 2018