

S01 – Child Protection Policy

HERITAGE CHRISTIAN SCHOOL

1. INTRODUCTION AND AIMS

All adults have responsibility to care for children and to protect them from any kind of abuse or neglect. The School is responsible to provide a safe environment for children, and to provide an educational environment and curriculum which fosters their health spiritually, emotionally, physically, intellectually and socially.

We are entrusted by parents with the care of their children, who are precious in the sight of God.

This policy provides the requirements in relation to Child Protection at Heritage Christian School. It relates to suspected or reported cases of reportable conduct against students by staff, parents, other students, or by other persons outside the school. Such reportable conduct can also constitute sexual harassment. Therefore, this policy is to be read in conjunction with the Sexual Harassment Policy of Heritage Christian School.

Reportable conduct means:

- a. any sexual offence, or sexual misconduct, committed against, with or in the presence of a child (including pornography offence), or
- b. any assault, ill-treatment or neglect of a child, or
- c. any behaviour that causes psychological harm to a child,

whether or not, in any case, with the consent of the child.

Reportable conduct does not extend to:

- a. conduct that is reasonable for the purposes of the discipline, management or care of children, having regard to the age, maturity, health or other characteristics of the children and to our code of conduct (Appendix 3) and professional standards, or
- b. the use of physical force, that in all the circumstances, is trivial or negligible (according to the ordinary everyday meaning of these words), but only if the matter is to be investigated and the result of the investigation recorded under workplace employment procedures, or
- c. conduct of a class and kind exempted from being reportable. Examples include:
 - i. touching a non-intimate part of a child's body in order to attract the child's attention, to guide a child or to comfort a distressed child;
 - ii. a teacher raising his or her voice in order to attract attention or to restore order in the classroom;
 - iii. conduct that is established to be accidental;
 - iv. providing appropriate medical care to a child who is hurt;
 - v. guiding a child by the shoulders, arms or hands;
 - vi. not providing supervision where this was for good reason, and for a short period of time and where the risk of harm was reasonably perceived at the time to be low;

- vii. actions found to have been appropriate physical contact in classes such as sport, drama, dance etc.

(Copies of class or kind agreements are available at www.kids.nsw.gov.au/check/. These will be updated whenever new class or kind agreements are made).

2. GUIDING PRINCIPLES

Scripture indicates the nurture of children is a great responsibility given to the community, with specific responsibility given to their parents.

To Parents: *“Fathers, do not exasperate your children, instead, bring them up in the training and instruction of the Lord.”* Ephesians 6: 4 (NIV)

To the Nation: *“....do not forget the things your eyes have seen or let them slip from your heart as long as you live. Teach them to your children and to their children after them.”*Deuteronomy 4: 9 (NIV)

It is the staff’s responsibility to love the children in their care. This love will guide staff’s actions and direction as they stand in the place of parents.

“Love does not delight in evil, but rejoices with the truth. It always protects, always trusts, always hopes, always perseveres.” 1 Cor. 13: 6, 7 (NIV)

When a child is enrolled at Heritage Christian School, the school enters a contract with the parents to assist the parents with the God-given responsibility of the nurture of their children. Specifically, the school focuses on the education of the child. The school strives to fulfil this contract, and to support the family unit, but not to the detriment of the welfare of the children. In every action related to reportable conduct, the best interest of the child is of paramount consideration.

Governments have the responsibility to punish wrong doers and endeavour to protect their citizens, and the school recognises that the Department of Community Services (hereafter referred to as DoCS) has a valid role in this process. The School aims to develop a relationship with DoCS that will enable the school to be involved in the process of protecting children. In proceeding to take action under the Children (Care and Protection) Act 1987, school staff must satisfy themselves that they are acting on reasonable grounds.

While reportable conduct has horrific consequences, and can damage children for the rest of their lives, and the school will make every effort to protect children from this, it must be recognised that we all fall short of what the Lord would have us do. Therefore, all persons allegedly involved in situations where reportable conduct is suspected or disclosed are to be treated with sensitivity, dignity and respect because they, too, are loved by God.

Staff who have access to information regarding suspected or disclosed reportable conduct are to observe strict confidentiality in relation to the entire matter.

3. POLICY STATEMENT

- a. Heritage Christian School is committed to providing a safe environment for students, to prevent reportable conduct in any form, and to deal with reports of abuse promptly and appropriately.
- b. The term “reportable conduct” in this policy can take a number of forms including sexual abuse, physical abuse, emotional abuse and neglect. The term “sexual abuse” in this policy means the involvement of dependent children or adolescents in sexual activity with an adult or older, bigger or more mature, and therefore, more powerful person. The child is used as a sexual object for the gratification of the older person’s needs / desires, or is unable to give consent due to the unequal power in the relationship, or is too young to be able to make a reasonable decision because of their age. Sexual abuse does not include sexual activity between consenting peers, but it should be noted that the School does not condone sexual activity outside a monogamous heterosexual marriage.
- c. The Principal(s) are responsible for the administration and conduct of the school, and all that relates to it. Therefore, they are to be informed promptly of all serious matters concerning the welfare of students. Each Principal will inform the other when required.
- d. All staff must report any suspicions of reportable conduct to their relevant Principal. He will assist the staff member to determine whether the matter constitutes reasonable grounds for suspicion, and whether further action is required. Cases of reasonable suspicion of child sexual assault must be reported to DoCS, as well as to the Principal(s). Mandatory reporting is required by law for teachers, Counsellors, Principals, and Heads of Schools for any child under the age of 16 years for cases of sexual assault only.

If evidence of a crime, sexual or otherwise, exists the matter will be reported directly to the police by DoCS.

- e. Accurate documentation will be kept concerning reports made about possible reportable conduct, details of notification, actions within the school resulting from notification, and other details related to reported cases of abuse. The Principal(s) will be responsible for the keeping of these records.
- f. Staff employment policy and procedures will endeavour to ensure that staff who are appointed to positions are fit and proper persons to occupy those positions, and understand their responsibilities in this area.
- g. Inservice and induction processes will ensure that all staff are thoroughly conversant with this policy and related procedures.
- h. Child Protection curriculum will be effectively incorporated and implemented within the school curriculum.

- i. A Staff Code of Conduct With Students will be agreed to by all staff, and adhered to. Staff members who the Board of HACE reasonably believe, on the face of evidence, to have breached this code or any part of this policy may be summarily dismissed from employment.
- j. This policy and procedures will be re-examined on a regular basis as part of the general review of policies.

4. PROCEDURE AND GUIDELINES

a. Identifying Reportable Conduct

- i If a child tells you about reportable conduct:

Staff need to be well prepared so that they can be supportive of the student and clear about their responsibilities at the same time. It is essential that the staff member remains calm and supportive of the student.

The staff member should:

- actively listen to the student, and never probe for details or ask leading questions;
- refrain from questioning excessively, even if unsure of whether to notify;
- talk gently and reassuringly, pointing out that you are there to help;
- only ask open-ended questions that are designed to provide sufficient information about whether the suspicion of reportable conduct is reasonable, and therefore sufficiently strong enough to warrant a report being made;
- where the reportable conduct is taking place outside the school's control, never assure the student that the abuse will stop as that cannot be guaranteed;
- do not make promises that you will not tell anyone; in fact, you should disclose that you have a responsibility to tell your relevant Principal.

- ii If a child begins to make a disclosure in a group situation, staff are required to:

- acknowledge that you have heard the student;
- indicate your support by explaining that what the student has said sounds important, and that it would be better to talk about it to you later;
- quietly arrange an appropriate time to see the student away from other students.

- iii If you have reason to suspect reportable conduct:

From time to time staff may suspect reportable conduct may have occurred, or may be about to occur. Staff need to be aware of the indicators of reportable conduct. Appendix 2 lists some general and specific indicators of reportable conduct, which staff can refer to.

- iv If someone reports reportable conduct to you:

Staff or students, who in good faith make an allegation of reportable conduct of a sexual or abusive nature by a person against a student, will not be prejudiced in any way. Assure them that you will do everything you can to address the issue.

If anyone reports actual or suspected reportable conduct, you should report this to the relevant Principal immediately, so that a decision can be made whether this constitutes reasonable grounds for suspicion.

b. The Role of the Department of Community Services (DoCS)

Scripture assigns Governments the roles of punishing wrong doers and endeavouring to protect citizens, and the School supports the role the Governments play in protecting children through DoCS. The School aims to develop a relationship with DoCS that will enable the School to be involved in the process of protecting children.

In proceeding to take action under the Children (Care and Protection) Act 1987, school staff must satisfy themselves that they are acting on reasonable grounds:

The Children (Care and Protection) Act 1987 (as amended).

This Act forms the statutory basis for the role of DoCS for the investigation of cases of suspected reportable conduct, and the responsibilities borne by schools in relation to such cases. A child is defined as a person under the age of 18 years.

Reportable conduct in relation to a child is explained in the Introduction and Aims section of this document.

Mandatory reporting of suspected child sexual assault to DoCS is required under the Children (Care and Protection) Act 1987 for teachers, Counsellors, Principals and Heads of Schools, for any child under the age of 16 years, even if reporting is against the wishes of the child. All staff are to report cases of suspected sexual assault to the Principal, who will promptly notify DoCS should he / she consider the information constitutes reasonable grounds for suspicion. If the staff member reporting to the Principal believes they have reasonable grounds for suspicion of sexual abuse, they must also report the matter to DoCS regardless of the Principal's decision.

Notification to DoCS shall occur if a staff member (or any other person) forms a belief that a child under 16 years of age, or a child who is 16 or 17 years of age, has been, or is in danger of being, abused (other than sexual assault), or is a child in need of care.*

** A child is defined as being "in need of care" if adequate provision is not being made, or is likely not to be made, for the child's care, if the child is being or likely to be abused, or there is substantial and presently irretrievable breakdown in the relationship between the child and one or more of the child's parents.*

All notifications that involve a criminal offence under the Children (Care and Protection) Act 1987, the Crimes Act 1900, or the Crimes (Female Genital Mutilation) Act 1995, must be referred by DoCS to the police. This includes all cases of sexual abuse. Child abuse under the Crimes Act 1900 refers to a range of offences that result in harm to a child victim, or which involve behaviours to which a child cannot give consent. Offences include sexual intercourse, indecent assault, and indecent acts.

c. Procedures in Relation to an Allegation or Reporting of Reportable Conduct
(reference may also be made to the flowchart in Appendix 4)

Allegations are to be reported to the Principal(s) either orally or in writing. Where an allegation is made to a staff member other than their Principal(s), the staff member should immediately report the matter to him. It is his responsibility to inform the Board of HACE and, if necessary, his co-Principal as soon as practicable. In cases of allegations against a Principal, the Board Chairman should be contacted.

Staff or students who in good faith make an allegation of improper conduct of a sexual or abusive nature by a person against a student will not be prejudiced in any way.

The Principal(s) must respond promptly and sensitively to any allegation, and, if necessary notify DoCS.

Efforts will be made to offer counselling support to all parties in relation to a reported allegation.

Allegations of Improper Sexual conduct by a Staff Member Against a Student:

A signed written statement detailing the nature of the allegation will be sought by the Principal(s) wherever possible. Where the person making the allegation is unable or unwilling to sign a written statement, then the relevant Principal(s) are to record details of the allegation as reported using, as far as possible, the words used by the person making the allegation.

The Principal(s) must direct the person making the allegation to maintain confidentiality.

Upon receiving the allegation, the Principal(s) shall notify the agencies (eg. DoCS, the NSW Ombudsman) which are required to be notified promptly, and report details of the allegation.

The Principal(s) should advise the parents or care givers of the student(s) concerned as soon as possible after the allegations are reported, and the fact that the matter has been notified to the necessary agencies.

The Principal(s) will make an appointment with the staff member against whom the allegation has been made. The staff member will be informed, when making the appointment that they may have a support person (including a lawyer) during the meeting, because of its very serious nature with possible grave consequences impacting on the staff member's employment, and possible criminal charges.

During the interview, the Principal(s) will inform the staff member:

- that an allegation has been made, and the nature of the allegation;
- the steps the School has taken in accordance with policy;
- that a response is not required at the time of this interview;
- that counselling support can be arranged for the staff member;
- that steps will be taken to severely restrict the staff member's contact with the student involved within school hours, and / or the nature of the staff member's continued presence at the school during the investigation by DoCS or the Principal(s) (whichever is required). This may involve a direction to undertake duties at a different location or a direction to remain at home on pay. These changes to conditions should be given to the staff member in writing.

d. Student Interviews Conducted by DoCS Officers or Police Officers at School

In relation to reportable conduct where DoCS has been notified, officers of DoCS and the NSW police Service may wish to carry out student interviews, sometimes jointly, at school.

Before allowing any officers access to information or students, the Principal(s) should sight the officers' identification, and may confirm this with a phone call to their office.

No student will be interviewed at the School against the wishes of the student, and it is the Principals' responsibility to inform the student of this.

The officers should give the School, in writing, an official confirmation of an investigation involving a particular child.

At the commencement of the interview, the Principal(s) should ask the investigating officers to explain to the student, in the presence of the Principal(s), the purpose of the interview and their role.

The Principal(s) will inform the student of his / her right to choose a supportive adult to be present at the interview. If a person is nominated by the student, the interview must not commence until that person has arrived. What takes place in the interview becomes part of the investigation, and must remain confidential. The interview may be taped by the support person if all parties agree. Otherwise notes should be taken as a record of interview for the school.

Except in cases which involve a member of the family, it is expected that a parent of the child concerned will be present at any interview with the child. Should the allegations be made against a family member, the parents will be informed of the interview as soon as possible after it has commenced.

DoCS or Police Officers are responsible for communicating with parents about any further matters related to an interview.

e. Exchange of Information with DoCS

Before any phone discussions occur between officers of DoCS and the Principal(s), the Principal(s) must always confirm the identity of the caller by phoning the known number of the Community Services Centre.

Any staff that receive a call from DoCs must refer the officers to the Principal(s) immediately, so that the Principal(s) can confirm the identity of the caller and discuss the issue with the caller following this.

Any information requested verbally by DoCS must be confirmed in writing promptly.

The Principal(s) should inform parents immediately that the school has supplied information to DoCS, unless DoCS supplies the school with a written confirmation that the parents are not yet excluded from suspicion.

5. IMPLEMENTATION

The Principal(s) are responsible to ensure that this policy is effectively understood and implemented by staff and students.

a. Staff Communication of Policy

All staff will be made aware of this policy via the Staff handbook. Staff will be reminded of the policy as it applies to them and their students through review at staff development meetings from time to time.

An explanation of implementation of this policy and procedures shall form part of the staff induction programme.

All staff will be reminded, and have the policy summarised verbally to them at the beginning of year staff development sessions, (eg, go over the flow chart in Appendix 4)

b. Student Communication of Policy

The Child Protection Policy will be integrated into the Personal Development, Health and Physical Education classes by the end of Term 1 each year.

c. Investigation of Complaints / Allegations

- Allegations against staff members:

If the allegation is not required to be investigated by DoCS or the police, the Principal(s) will conduct an investigation into the allegation. Alternatively, an independent investigator may be appointed by the Principal(s) to undertake this investigation. This is advisable when a conflict of interest is apparent. In either case, the investigation will be conducted according to the procedures set out in the AIS Protocols.

Complaints / allegations will be investigated in a confidential manner. No staff member or student should be disadvantaged or prejudiced as a result of reporting an allegation / complaint.

Where the Principal(s) reasonably conclude after reviewing the evidence that reportable conduct has taken place, or the Staff Code of Conduct with Students has not been complied with, a staff member may be summarily dismissed from employment or student expelled from the school. This action may occur irrespective of whether a conviction has been determined by a Court of Law.

After the investigation is completed and the final findings are made, the Principal(s) will send these to the NSW Ombudsman, and make a copy available to the staff member. The Principal(s) will make any necessary notification of these findings to the Commission for Children and Young People (CCYP), according to the criteria set out in the AIS Protocols.

If necessary, appropriate disciplinary proceedings may be conducted by the Board and/or Principal(s) following the investigation. Such disciplinary proceedings may include dismissal, suspension from duties or an official warning. If the staff member is asked to return to work, directions may be given in writing to the staff member concerning their future conduct in the school, and in particular their contact with the student who was the subject of the allegation.

- Allegations against students, or involving students (as the victim):

During the process of investigation, the following may occur:

- a strong recommendation for the student to receive counselling from an appropriate person;
- a staff member or student may have their duties adjusted so that they are removed from contact with others that may cause difficulties for the investigation;
- suspension of any student who has been accused of reportable conduct.

If a student is found to have been guilty of reportable conduct, appropriate disciplinary proceedings may be conducted by the Board and/ or Principal(s). Such proceedings may include expulsion or suspension from school, or other consequences deemed to be appropriate. If the student is asked to return to school, directions may be given in writing to the student and their parents or caregivers regarding their future conduct in the school, and in particular their contact with the student who was the subject of the allegation.

6. OTHER MATTERS

Removal of Students by DoCS Officers

From time to time the Principal may be approached by officers from DoCS to remove a student from the school premises. This approach will be supported by a Section 60 Notice. If a student is to be removed from the school (Section 60), or ordered to remain at the school (Section 62A) the Principal(s) must:

- sight the identification of the DoCS officers;
- take a copy of the Section 60 or Section 62A notice;
- record details of the actions, names of officers and, where possible, place of lodgement of the student;
- gain an assurance from the officers of DoCS that they will immediately inform the parents or care givers of the student that the student has been removed from the school, or has been ordered to remain at the school.

Acknowledgement: This policy was modified based on the Child Protection Policy of Orange Christian School, and in part the Child Protection policy of Nepean Christian School.

APPENDIX 1: EXAMPLES OF REPORTABLE CONDUCT (SEXUAL)

The term “sexual abuse” in this policy refers to reportable conduct of a sexual nature. It means the involvement of dependent children or adolescents in sexual activity with an adult or older person. This is where the child is used as a sexual object for the gratification of the older person’s needs / desires, or is unable to give consent due to the unequal power in the relationship, or is too young to be able to make a reasonable decision because of their age. Reportable conduct of a sexual nature does not include sexual activity between consenting peers.

Reportable conduct of a sexual nature can take many forms. Examples of this include the following, but may include other activities:

- vaginal or oral penetration by a finger, penis or any other object (except where carried out for proper medical purposes);
- oral sex;
- any indecent act, defined as one which right-minded persons would consider contrary to community standards of decency;
- indecent assault, being defined as an assault, a touching without consent, accompanied by an indecent act;
- fondling or touching genitals, breasts, buttocks, or thighs;
- masturbation in the view or presence of children or adolescents;
- displaying pornography to children or adolescents;
- exhibitionism in the view or presence of children or adolescents;
- sexually suggestive behaviour toward children or adolescents;
- taking sexual advantage of the child through misuse of power;
- conversations with a lewd or sexual theme within the hearing of children or adolescents.

Reportable conduct of a sexual nature also includes attempting any of the above acts, or assault with such intent.

APPENDIX 2: INDICATORS OF ABUSE AND NEGLECT

In assisting staff to identify suspected cases of reportable conduct, indicators of abuse or neglect **may** include, but are not limited to the following: (None of these indications, on their own, should be taken as clear evidence of abuse).

General Indicators

- History of previous harm to the child
- Abuse or neglect of a sibling
- Social or geographic isolation of the child or family
- Family history of violence including injury to children
- Domestic violence
- Physical or mental health issues for the parent or care giver
- The parent or care givers' abuse of alcohol or other drugs
- A developmental disability of the parent or care giver
- Parent or care giver experiencing significant problems in managing the child's behaviour
- A history of injury which is vague, bizarre or variable
- Marked delay between injury and presentation for medical assistance
- The child tells you he or she has been abused, or he or she knows someone who has been abused and may be referring to themselves
- A friend, relative etc tells you that the child may have been abused

Specific Indicators

Sexual Abuse

- Direct or indirect disclosures
- Describing sexual acts
- Age inappropriate behaviour and/or persistent sexual behaviour
- Age inappropriate knowledge
- Self destructive behaviour (eg self mutilation, suicide attempts)
- Overtly sexual themes in play, artwork or writing
- Persistent running away from home
- Anorexia, over eating
- Unexplained accumulation of money or gifts
- Adolescent pregnancy
- Injuries to the breasts, buttocks, lower abdomen and thighs
- Other child stress indicators (eg poor concentration, nightmares and bed wetting, marked changes in behaviour, complaints of stomach aches and headaches with no physical findings)

Physical Abuse

- Bruising and other injuries to the face head or neck
- Bruising to the upper arms
- Lacerations and welts
- Explanation offered by the child inconsistent with the injury
- Bruising and marks which takes the shape of an object (belt buckle, hand etc)
- Bite marks and scratches
- Multiple injuries or bruises
- Burns and scalds

Emotional Abuse

- Feelings of worthlessness about life and themselves
- Inability to value others
- Lack of trust in people and expectations
- Extreme attention seeking behaviour
- Behavioural disorders
- Persistent hostility in parents or care givers or constant criticism of the child

Neglect

- Poor standards of hygiene
- Scavenging or stealing food
- Extended stays at school, public places, others homes
- Being focussed on basic survival
- Untreated physical problems

APPENDIX 3: STAFF CODE OF CONDUCT WITH STUDENTS

The aim of this code is to guide staff as to the limits of their relationships with students, and it is also included in the Staff Handbook. It is designed to protect the staff from situations which may raise suspicions regarding inappropriate behaviour, and ensure that staff who act according to the code do not act in a sexually abusive or harmful manner towards students. Necessarily this will place requirements on staff when not in the school situation, as teachers conduct outside the school in a non-professional setting will affect their professional standing in the community.

- a. All actions of staff towards children must always be motivated by a desire for the welfare of the child. Love always protects. (1 Cor. 13:7)
- b. Staff must act in a professional manner towards students at all times.
- c. Generally, staff should only touch students on the shoulders or head. Staff must never touch students on the thighs, buttocks, genitals or breasts, except in extreme cases where not doing so would threaten the safety of the student.
- d. Should a student require urgent medical attention to the areas of their body mentioned above, and they are incapable of doing so themselves under instruction, the attention should, where practicable, be given by an adult of the same sex as the student, with at least another adult present.
- e. It is not permitted for staff members to kiss students.
- f. Staff members should not be physically intimate with students.
- g. There are times when a student is upset and a staff member believes the student would be comforted by a hug. This may only happen in public view, preferably with another adult present, and only when the staff member reasonably believes that it is acceptable to, and not uncomfortable for the child. The staff member must always act in a way that does not risk imposing the staff members will on the child. Hugs should not be prolonged or frequently repeated. Questions such as: "Would a hug help?" are recommended.
- h. Hugs that are initiated by the student are acceptable provided that other conditions in this code are met. This is especially true for lower primary students.
- i. Staff should never be alone with a child in circumstances where they are not visible to other adults. Staff should never be in a situation where they are not likely to be interrupted, and should not be isolated with a student for an extended period of time, even if parental consent has been given.
- j. Staff should not transport a student in their vehicle unless other students or adults are also in the vehicle. Exceptions to this may be made in an emergency situation, or where the student would otherwise be in danger or be greatly inconvenienced.

- k. Staff members should be aware that young people becoming sexually aware may be confused by the actions of a staff member. Staff members must not court, date or develop a relationship with students other than the appropriate professional relationship between teacher and student.
- l. Staff mentors of students (eg. Year 12) must be appointed by the Secondary Co-ordinator. Such mentors must be the same sex as the student in each case.
- m. Staff approached by students of the opposite sex for counselling should immediately refer the student to a member of staff of the same sex as the student, or to the School Counsellor.
- n. Staff must not have conversations of a lewd or sexually suggestive nature with students, or make comments of this nature to any student. Staff must not facilitate access by students to lewd or sexually suggestive material.
- o. Should any students make any advances toward a staff member, or should the staff member suspect that a student may have or may be developing a romantic infatuation with them, they should report their suspicion to the Principal(s). Married staff are also encouraged to tell their spouse. Staff members also have a responsibility to inform another staff member if the former believes a student is infatuated with the latter.
- p. Staff who find themselves thinking often or fantasising about student(s) in a sexual or inappropriate way should immediately seek counselling or speak to the Principal. Should these thoughts continue, the staff member should consider the appropriateness of their position at the school, and discuss this with their counsellor and the Principal.
- q. Staff will inform the Board of HACE through the Principal(s) of any accusations of child abuse or sexual abuse against them or any other staff member as soon as practicable. Any prior convictions of child abuse must be disclosed upon application for the position at the school.
- r. Staff members should not engage in any activities that systematically or continually belittle, embarrass or victimise a student. Students should be treated with love and respect.
- s. Staff members should never punish a child using physical force, or strike a student for any reason. Staff members may use the appropriate physical force to restrain a child if they have reason to believe that the child may cause damage to themselves, another person, materials or equipment.

Staff are required to comply with the above Code of Conduct. Failure to do so may result in summary dismissal.

APPENDIX 4: NOTIFICATION FLOWCHART

Principal will keep documentation of each step.
Principal will care for and support notifying person.



