STAFF AND PUPIL INTERACTIONS

Legal References	Bill 19 (The Public Schools Amendment Act - Safe Schools); The Public Schools Act; The Child and Family Services Act; Criminal Code of Canada; Provincial Ministerial Directive on Strengthening Student Safety and Professional Boundaries in Online Communications (October 23, 2026)
Administrative Procedure Cross-References	AP 210: Safe and Caring Schools; AP 234: Responsible Use of Information and Communication Technologies (ICT); AP 509: Software Procurement

1. Introduction and Purpose

The Swan Valley School Division is committed to establishing and maintaining educational environments where every student feels safe, respected, and protected from harm. School employees hold a legal, ethical, and moral position of trust and authority in relation to pupils. Maintaining appropriate professional boundaries in all interactions, whether in person, on school property, or across digital platforms, is essential to protecting student well-being, supporting healthy relationships, maintaining professionalism, and ensuring public confidence in the education system.

This Administrative Procedure is formulated in compliance with Bill 19 (The Public Schools Amendment Act - Safe Schools), which received Royal Assent on June 3, 2025, and incorporates mandatory provincial directives issued by the Minister of Education and Early Childhood Learning on October 23, 2026, regarding online communications and professional boundaries. This procedure operationalizes the divisional safety commitments outlined in AP 210 (Safe and Caring Schools) and directly intersects with the technical, security, and procurement frameworks established under AP 234 (Responsible Use of Information and Communication Technologies) and AP 509 (Software Procurement).

2. Definitions

To ensure consistent application across all school division operations and digital environments, the following terms are defined:

- **Approved Online Communication Platform:** Any digital software application, web platform, mobile app, learning management system, or cloud communication tool that has completed the formal technical, security, and privacy vetting process outlined in AP 509: Software Procurement, receives active divisional network monitoring and oversight under AP 234: Responsible Use of ICT, and is designated by the Division for school-related communications.
- **Boundaries:** The legal, professional, and ethical standards that govern employee conduct when communicating or interacting with pupils. Boundaries delineate acceptable professional behavior from actions that compromise the employee's position of trust.
- **Intention:** Any deliberate act, interaction, or outcome planned or executed by a staff member.
- **Monitored Communication Environment:** Digital systems, networks, servers, and communication platforms where emails, text messages, communication records, and user activity may be monitored, reviewed, audited, or accessed by Information Technology Services and Senior Administration when warranted and in accordance with AP 234.

- **Parent/Guardian/Responsible Adult:** Any individual exercising parental care, rights, and obligations toward a pupil through biological, adoptive, customary, legal guardianship, temporary ward, or host family arrangements.
- **Personal Social Media Account/Private Channel:** Any non-divisional online platform, personal email address, private cellular text messaging service (SMS/MMS), personal social network profile (such as Facebook, Instagram, X, TikTok, or Snapchat), instant messaging app (such as WhatsApp, Signal, or Telegram), or direct messaging feature embedded within commercial platforms.
- **Property/Properties:** Physical grounds, buildings, vehicles, equipment, network infrastructure, software applications, and digital domains owned, leased, operated, or controlled by the Division.
- **Pupil:** Any person enrolled in or attending instruction, educational programming, or extracurricular activities sponsored by the Division, inside or outside Manitoba.
- **Staff or Staff Member:** All employees of the Swan Valley School Division, including divisional and school administrators, teaching personnel, non-teaching support staff, athletic coaches, regular volunteers, teacher candidates, practicum students, and members of the Board of Trustees.
- **Unacceptable Conduct:** Any behavior that physically, sexually, psychologically, or verbally abuses, harms, exploits, or bullies a pupil, or any failure to uphold professional boundaries.

3. Professional Boundaries and Standard of Conduct

Staff members occupy a legal position of trust and power relative to pupils. This position applies continuously across all settings and circumstances, whether or not the staff member or pupil is on school property or engaged in school activities.

Staff occupy a position of trust with students, families, and the public. Any breach of that trust constitutes a violation of professional responsibilities and standards. Accordingly, staff must exercise sound professional judgment at all times and avoid conduct that could reasonably be perceived as a breach of trust or abuse of authority. Employees and administrators share responsibility for ensuring that all interactions with students are transparent, accountable, traceable, and focused on student success.

4. Best Practices for In-Person Staff-Pupil Interactions and Property

4.1 Interactions During School Hours

Staff members shall not intentionally invite, permit, or arrange for a pupil to visit, meet with them, or jointly occupy private or non-school property (including an employee's or pupil's residence) during school hours unless:

- Advance authorization and permission are sought from and granted by the staff member's immediate supervisor.
- Advance written approval is obtained from the pupil's parent, guardian, or responsible adult and formally submitted to the supervisor.

Exceptions to Parental Approval: In rare situations where notifying a parent or guardian would pose a direct risk of harm to the pupil (e.g., child protection concerns), where the pupil is legally emancipated, or where notification would conflict with statutory child protection duties, the supervisor must evaluate all foreseeable risks and determine whether administrative authorization without parental notification is appropriate.

Recurring Physical Interactions: Where authorized visits or non-school property interactions occur more frequently than once per month, a general authorization covering the recurring activity may be granted jointly by the supervisor and parent/guardian.

4.2 Interactions Outside School Hours

Interactions and communications with students outside regular school hours must be limited to legitimate educational, extracurricular, safety, well-being, accessibility, or operational purposes and conducted in a manner that maintains professional boundaries, transparency, and public confidence.

Private Property Visits: In-person meetings, activities, or visits involving a student on non-school property outside regular school hours require prior written consent from the parent, guardian, or responsible adult, as well as prior approval from the employee's supervisor or school administrator.

Electronic Communication: Electronic communication with students outside regular school hours, including evenings, weekends, holidays, and school breaks, must be minimized and occur only when reasonably necessary. Whenever possible, communication shall occur during regular school hours and through approved divisional communication platforms.

Exceptional Circumstances: Off-hours electronic communication may occur when unique circumstances require timely contact, including matters related to student safety, accessibility, well-being, school activities, or urgent learning needs. Such communication is permissible provided that:

- Prior approval has been obtained from school administration, where reasonably practicable;
- The student’s parent, guardian, or caregiver is included in the communication or informed in advance whenever possible; and
- The communication occurs through approved divisional communication platforms.

Unintentional Community Interactions: Unplanned interactions with students in public or community settings are recognized as a normal part of community life. Employees must maintain appropriate professional boundaries and avoid conduct that could reasonably create a perception of favoritism, impropriety, or unprofessionalism.

Family and Personal Relationships: Interactions and communications arising from established family, kinship, caregiving, or longstanding personal relationships between employees and students are exempt from the approval requirements outlined in this section. Where such relationships reasonably intersect with an employee's professional responsibilities, the employee shall disclose the relationship to school administration to promote transparency, maintain public confidence, and prevent actual or perceived conflicts of interest.

5. Standards for Electronic, Digital, and Online Communications

All electronic communications between employees and students must strictly adhere to digital boundary rules that eliminate unmonitored direct channels and ensure complete transparency.

5.1 Personal Accounts and Direct Messaging

- **No One-to-One Personal Communications:** Staff members are strictly prohibited from initiating, maintaining, or participating in one-to-one communications with students using personal social media accounts, personal social networking profiles, personal email accounts, cellular text messaging (SMS/MMS), or embedded messaging features within commercial platforms.
- **No Connecting or Following on Personal Platforms:** Staff members must not add, follow, subscribe to, accept connection requests from, or engage with students through personal social media accounts where direct or private messaging functionality is available.
- **No Sharing of Personal Identifiers:** Staff members must avoid sharing personal phone numbers, personal social media handles, private handles or avatars, or personal email addresses with pupils.

5.2 Mandatory Use of Approved and Monitored Divisional Platforms

- **Approved Medium Requirement:** All electronic communications regarding educational programming, extracurricular activities, student support, athletic schedules, or other school-related matters must occur exclusively through online communication platforms that have received formal approved designation under AP 509: Software Procurement.
- **Active Divisional Monitoring:** In accordance with AP 234: Responsible Use of ICT, users should have no expectation of privacy when using divisional communication systems. All electronic communications must occur through approved divisional platforms, where communications and user activity may be monitored, logged, retained, and accessed by Information Technology Services and Senior Administration for administrative, operational, investigative, or legal purposes, when warranted.

5.3 Public Accessibility and Community Notification

The expectations and standards governing online communications must be clearly communicated to employees, students, and families at the beginning of each school year via student handbooks and parent communications from schools.

6. General Prohibited Conduct

To safeguard against grooming, boundary erosion, and perceived favoritism, staff members must refrain from the following prohibited behaviors during and outside school hours:

- **Exclusive Emotional Attachments:** Developing personal or emotional attachments with pupils beyond the boundaries of a professional educator-student relationship.

- **Disclosure of Personal Information:** Sharing personal details regarding romantic relationships, sexual matters, financial concerns, or private sensitive topics. (Voluntary disclosures regarding personal identity made within authorized school support initiatives, such as inclusive student alliances, are permitted).
- **Personalized Gifts:** Bestowing gifts of significant financial value or of a personal or intimate nature upon individual pupils.
- **Unnecessary Physical Contact:** Engaging in non-essential physical contact or physical interactions not required for instructional or safety purposes.
- **Singling Out and Favoritism:** Showing excessive attention, granting special privileges, or singling out specific pupils for personal friendship or comments regarding appearance, dress, or personal traits.
- **Secrecy Demands:** Asking or encouraging a pupil to keep secrets, private information, or specific incidents hidden from parents, guardians, or administrators.
- **Inappropriate Language:** Making or participating in profane, sexually suggestive, discriminatory, or inappropriate comments, jokes, or language in the presence of students.
- **Surrogate Parental Roles:** Assuming the role of a surrogate parent or guardian for a student or criticizing a student's parents or guardians in front of the pupil.

7. The "Rule of Two" Protocol

Staff members are strongly directed to incorporate the Rule of Two into all physical and virtual student interactions:

- **Physical Rule of Two:** Ensure that two authorized adults are present during one-to-one or small group interactions during and outside the school day. If two adults cannot be present, staff must hold meetings in visible locations (such as open classrooms or learning commons) or keep office or classroom doors wide open. If having two adults is not possible, staff should consider alternatives, such as meeting in a public area within the school, having another pupil present, and/or leaving their classroom or office door open.

8. Mandatory Abuse Prevention Training

Staff, coaches, and volunteers are mandated to complete required abuse prevention training programs at minimum once every four years. Staff will complete the Respect in School Program, and any staff or volunteers involved in extracurricular activities will complete the Respect in Sport Program. Completion of these programs, and continuing competence in the topics featured in these programs, serves to increase awareness and promote understanding of the many forms of neglect, bullying, harassment and abuse, including sexual exploitation and abuse.

9. Duty to Report and Disciplinary Sanctions

9.1 Statutory Reporting Obligations

Any staff member who becomes aware of, or has reason to believe that another employee is violating professional boundaries or engaging in unmonitored digital communications with a pupil, must report the matter at the earliest opportunity to their principal, supervisor, or the Superintendent. Failure to report violates statutory obligations under The Public Schools Act, The Child and Family Services Act, and the Criminal Code of Canada.

9.2 Disciplinary Enforcement

Boundary violations and unmonitored digital communications represent serious professional misconduct that exposes students to risk and compromises divisional integrity. Misuse of technology or failure to comply with this procedure may result in progressive discipline aligned with AP 234: Responsible Use of ICT and AP 509: Software Procurement, including:

- Immediate suspension or permanent revocation of network, account, and device privileges.
- Disciplinary measures up to and including formal written reprimand, suspension, or recommendation for termination of employment.
- Legal action or referral to law enforcement agencies and professional regulatory bodies.