

# **A Plan to Address Policies, Procedures, Systems, and Training to Ensure Student Safety in All Duval County Public Schools**

**Dr. Dana Kriznar, Superintendent**

**June 27, 2024**

One of our primary goals as a school district is to ensure the safety of our students. The information revealed over the last year regarding certain teachers at Douglas Anderson School of the Arts has made it abundantly clear that we have fallen short of our goal.

While individuals associated with Douglas Anderson have been at the center of attention, the safety of students at all schools is the focus of our plan. The issues that emerged from the events at Douglas Anderson revealed areas of weakness and opportunity that must be addressed.

When we talk of facility security, we strive to make schools the safest place children can be in their communities. Now as we address emotional and physical safety from predator adults, we must pursue the same high standard. Schools should be the most secure place a child can be in all facets of safety. The mission of the following plan is to:

## ***Prevent employee sexual misconduct impacting students.***

The plan is built on these six overarching strategies:

- 1. Policy improvements, including mandating employee action and requiring elevated review of incidents regarding child abuse, any type of sexual misconduct, and distribution of illegal drugs**
- 2. Improvement in investigation and external reporting of allegations**
- 3. Improvement in staff training related to professional ethics, policy, and expectations**
- 4. Improvement in student awareness of inappropriate adult behavior**
- 5. Creation of broader awareness of mechanisms for reporting inappropriate adult behavior**
- 6. Improvement in parent awareness of inappropriate action between school employees and students**

## Objectives and Actions

### Strategy Area 1:

#### **Policy improvements, including mandating employee action and requiring elevated review of incidents regarding child abuse, any type of sexual misconduct, and distribution of illegal drugs**

- A. The District will recommend that the Board modify Policy 6.80 (Professional Ethics) to mandate any person be removed from student contact in the following circumstances, regardless of where the offense occurs:
- Any arrest or allegation of child abuse or bodily harm to a person (regardless of age)
  - Any arrest or allegation of any type of sexual misconduct, including exposure
  - Any arrest or allegation asserting the use or distribution of illegal drugs
- 1) Responsibility: Human Resources and Policy and Compliance
  - 2) Complete by October 31, 2024
- B. The District will recommend that the Board modify Policy 6.80 (Professional Ethics) to mandate superintendent approval of any disciplinary decision following investigation of allegations involving the following, regardless of where the offense occurs:
- Any arrest or allegation of child abuse or bodily harm to a person (regardless of age)
  - Any arrest or allegation of any type of sexual misconduct, including exposure
  - Any arrest or allegation asserting the use or distribution of illegal drugs
- 1) Responsibility: Human Resources and Policy and Compliance
  - 2) Complete by October 31, 2024
- C. The District will recommend that the Board modify Policy 6.80 (Professional Ethics) to mandate that staff inform the Department of Children and Families (as required in Florida Statute and Board Policy 5.53) and the Office of Professional Standards if staff become aware of student allegations or any other evidence of employee misconduct. Additionally, the policy recommendation will include potential disciplinary action following normal due process, up to and including termination, in the event an employee is aware of an allegation and fails to report. The District will create a process for reporting to the Office of Professional Standards. Information about that process, along with information on how to report to the Department of Children and Families, will be embedded in annual staff training. The process for reporting to the Office of Professional Standards will include acknowledgment to the person reporting indicating

receipt of the report.

- 1) Responsibility: Human Resources and Policy and Compliance
- 2) Complete by October 31, 2024

- D. The District will recommend modification to Policy 6.84 (Fraternization with Students) to unambiguously state that employees texting, interacting on social media, and/or being alone with students who are not their family members may be grounds, following due process, for disciplinary action up to and including termination.

The policy will acknowledge that being alone with a student may be necessary in the performance of certain job duties (for example: student mental health counseling, a nurse attending to a sick student, or to protect the safety of a student lacking a ride home). However, as a general expectation, employees should not be alone with a student without justification and should plan to avoid such situations.

- 1) Responsibility: Human Resources and Policy and Compliance
- 2) Complete by November 30, 2024

## **Strategy Area 2:**

### **Improvement in investigation and external reporting of allegations**

- A. To expedite the closure of all investigations, the District will add additional investigators. The District will also increase the potential compensation of investigatory staff to improve staff retention in this office.

Additionally, the Office of Professional Standards will report quarterly to the superintendent on the status and duration of all open investigations. While judicial or other circumstances may impact the length of an investigation, the target timeline for opening and closing an investigation will be 75 business days or less except in cases that include involvement of other investigatory agencies. If that target is not being met on a consistent basis, the District will consider additional steps to achieve that objective.

- 1) Responsibility: Human Resources
- 2) Complete by September 1, 2024

- B. The District will add “inconclusive” as a potential conclusion in an investigatory report.

This new category will enable an investigator to conclude that evidence may be inconclusive to support an allegation but that the allegation is not necessarily unsubstantiated.

An Investigation Review Team (IRT) chaired by the Assistant Superintendent of Human Resources and at least two cabinet-level employees will review any case deemed inconclusive by the investigator related to the following, regardless of where the alleged offense occurred:

- Any arrest or allegation of child abuse or bodily harm to a person (regardless of age)
- Any arrest or allegation of any type of sexual misconduct, including exposure
- Any arrest or allegation asserting the use or distribution of illegal drugs

The committee may change the final finding from inconclusive to either substantiated or unsubstantiated; direct the investigator to continue the investigation; or validate the inconclusive finding and recommend discipline or professional development. While it is mandatory for an IRT to review cases in the categories above, the Assistant Superintendent of Human Resources may call an IRT at their discretion on any cases determined to be inconclusive by the investigator. Conclusions of allegations that are inconclusive will remain in the employee's file and will be tracked for administrative awareness over time.

- 1) Responsibility: Human Resources/Office of Professional Standards
- 2) Complete by September 1, 2024

C. The District will convene an Outcome Review Team (ORT) of appropriate cabinet-level leaders to review investigations, findings, and disciplinary recommendations in cases involving the following, regardless of where the alleged offense occurred:

- Any arrest or allegation of child abuse or bodily harm to a person
- Any arrest or allegation of any type of sexual misconduct, including exposure
- Any arrest or allegation asserting the use or distribution of illegal drugs

The ORT will be chaired by the Superintendent and will include the Office of General Counsel, the Chief of Schools, the Chief of Human Resources, and other leaders at the discretion of the Superintendent. The committee's formal purpose will be the protection of students, and its work will be advisory to the Superintendent's final disciplinary recommendation or decision.

- 1) Responsibility: Human Resources
- 2) Complete by August 1, 2024

D. The District will enhance its capability to identify trends or abnormal levels of disciplinary activity at a school location by implementing a robust, commercially proven disciplinary tracking system.

The District will load the new system with past and future disciplinary activity of active employees and any rehired employees.

Additionally, the District will implement procedures for Superintendent review of disciplinary data on a quarterly basis.

- 1) Responsibility: Human Resources/Office of Professional Standards
- 2) System implemented by November 1, 2024
- 3) Upload of historic activity to be completed within 12 months of system implementation

- E. The District will engage with an outside human resources expert to conduct an external review of the District’s human resources procedures and processes.

A final work product of this engagement will be the development of comprehensive procedures, inclusive of all procedures referenced in this plan. Recommendations and action steps will be presented to the School Board.

- 1) Responsibility: Human Resources
- 2) Presented to the School Board upon completion; expected within the 2024-25 academic year, contingent on the availability of the expert selected to perform the review

- F. The District will use the Florida Department of Education’s system for digital transmission of employee misconduct allegation files to the state.

- 1) Responsibility: Human Resources/Office of Professional Standards
- 2) Completed 2023

### **Strategy Area 3:**

#### **Improvement in staff training related to professional ethics, policy, and expectations**

- A. The District will ensure that all staff are informed of Board-approved policy changes addressed in this plan.

- 1) Responsibility: Human Resources/Policy and Compliance
- 2) Complete by December 2024

- B. The District will recommend that the Board add Society for Human Resources Manager certification to the job description for the Assistant Superintendent of Human Resources as a minimum requirement. Executive Directors working in the Human Resources Department will be required to achieve this certification within 24 months of employment; failure to achieve this certification will be grounds for non-

reappointment. The current Assistant Superintendent has achieved certification, and current Executive Directors are on pace to achieve certification by December 2024.

- 1) Responsibility: Human Resources
- 2) Added to job descriptions by November 2024

C. The District will continue to emphasize the professional responsibilities and expectations for conduct among all school staff in annual required training prior to each school year. The District's annual ethics training will be modified to include notification that students and parents are being informed of situations that may be considered inappropriate conduct and the reporting processes for those allegations.

- 1) Responsibility: Human Resources
- 2) Ongoing

D. The District will implement mandatory student protection/safe schools training for all teachers, paraprofessionals, coaches, club advisors, principals, and assistant principals. The training will address the following topics:

- Definition of Sexual Misconduct
- Legal Obligation
- Signs of Sexual Misconduct
- Clear Professional Boundaries

- 1) Responsibility: Human Resources
- 2) Beginning Fall 2024 with mandatory requirement for all employees to complete the training by December 31, 2024
- 3) New employees will be required to complete the training prior to interaction with children.

#### **Strategy Area 4:**

##### **Improvement in student awareness of inappropriate adult behavior**

A. The District has completed age-appropriate videos about identifying and reporting sexual misconduct, which will be played and discussed with scripted lessons at mandatory code of conduct meetings for all students. The scripted lessons will include age-appropriate information on signs of grooming behavior and avenues for reporting inappropriate employee conduct.

- 1) Responsibility: Chief of Schools
- 2) Timing: Beginning of each school year

- B. To reinforce information provided at the beginning of the school year, the District will include an age-appropriate lesson on *identifying and reporting sexual misconduct* as a topic during required mental health instruction in all grades. (Currently, district and state required mental health instruction is delivered through the Wellness Wednesday program.)
- 1) Responsibility: Chief of Schools/Chief Academic Officer
  - 2) Timing: Second or third quarter of each school year

### **Strategy Area 5:**

#### **Creation of broader awareness of mechanisms for reporting inappropriate adult behavior**

- A. The District has already implemented an online reporting form for students to report allegations of employee misconduct to District personnel. While the form asks for student contact information, it can be submitted anonymously.
- 1) Ongoing responsibility: Communications and Office of Professional Standards
  - 2) Completed 2023
- B. The District will establish procedures for addressing allegations received through online reporting. Procedures will include steps to ensure Superintendent awareness of allegations, progress of investigations, and disciplinary outcomes for any allegation of:
- Child abuse or bodily harm to a person (regardless of age)
  - Any type of sexual misconduct, including exposure
  - The use or distribution of illegal drugs
- 1) Responsibility: Human Resources
  - 2) Complete by January 2025
- C. The District will implement periodic communications directed to students, such as posters, flyers, social media posts, student IDs, information on the student information portal, and other tactics to make them aware of this reporting mechanism as well as other systems to report issues impacting students, such as bullying or safety concerns.
- 1) Ongoing responsibility: Communications
  - 2) Implemented annually

**Strategy Area 6:**

**Improvement in parent awareness of inappropriate action between school employees and students.**

A. The District will design and implement a communication plan to help parents and caregivers understand appropriate and inappropriate interactions between school employees and children. The communication program will include elements such as social media posts, information distributed at open houses and school events, information distributed through PTAs and other parent groups, and a course in the Parent Academy. All parents and caregivers will be notified regarding the informational opportunities through districtwide communication tools.

- 1) Responsibility: Communications and Human Resources
- 2) Implementation in the 2024-25 school year