

Student Protection Policy

It is the expressed policy of Real World Initiatives that employees, contractors (including Coaches), volunteers, funders, board members and the staff for participating employers who interact with ProX Interns (collectively "Covered Individuals") shall not engage in or permit any actions that would constitute Abuse or Molestation. To make this "zero-tolerance" policy clear, Covered Individuals are required to report any information about an Act of Abuse or Molestation as outlined below.

Abuse or Molestation as used in this policy encompasses any sexually oriented communication, touching, or affectionate conversations between Covered Individuals and an Intern, or by an Intern against another Intern.

Behavior Guidelines

In an effort to avoid any Abuse or Molestation, as well as the potential for any misunderstandings that could lead to allegations that particular conduct is Abuse or Molestation, Covered Individuals should follow the following guidelines when interacting with Interns:

1. Don't be alone with an Intern, regardless of the setting.
2. Don't transport an Intern. When providing transportation is unavoidable, you must comply with guideline 1;
3. Don't interject yourself into an Intern's personal life;
4. Don't invite an intern into your own personal life.

A more explicit set of guidelines to follow when interacting with Interns is outlined in Appendix 1.

Reporting

Reports of Abuse and Molestation should be reported to ProX in one of the following ways:

1. Calling the ProX reporting hotline ("EthicsPoint") at 855-748-5770;
2. Filing a report online in EthicsPoint at www.kauffman.ethicspoint.com
3. Calling or e-mailing ProX's legal counsel:
 - a. John Tyler, General Counsel (816-932-1293, or jtyler@kauffman.org).
 - b. Dana Tippin-Cutler, independent outside counsel (816-471-8575 x303, or drcutler@tippinlawfirm.com)

Interns (or their families) may also report Abuse or Molestation to any ProX representative with whom the reporting individual is comfortable. This could include any employee, a trusted Coach or the ProX Program Director, Michael Robins (Michael Robins- mrobins@kauffman.org or 816-932-1274).

Covered Individuals must report any information about Abuse or Molestation using one of the three enumerated reporting mechanisms above.

Reports made via EthicsPoint may be filed anonymously, but sufficient information must be provided to enable follow-up on and investigation of the report.

It is not required that a victim directly confront the person against whom a report of Abuse or Molestation is made before reporting an incident.

Reporting to Law Enforcement or Protective Services

Actions falling within the definition of Abuse or Molestation may also be crimes. ProX is committed to reporting acts of Abuse or Misconduct to appropriate law enforcement, prosecution or child welfare authorities and will support the prosecution of any crimes arising out of acts of Abuse or Molestation to the fullest extent of the law.

Investigation & Follow Up

ProX legal counsel will lead the investigation(s) of any report(s) of Abuse or Molestation. Every reasonable measure to ensure that those named in any complaint of Abuse or Molestation or who are too closely associated with those involved in the complaint will not be part of the investigative team.

All reports will be received and acted on in confidence to the extent possible given legal requirements and the need to gather facts, conduct an effective investigation and take necessary corrective action. Those who report or are the victim named in a report can expect that such reports will be handled fairly, timely and consistently so that matters are resolved as quickly as possible.

ProX will cooperate fully with any investigation conducted by law enforcement or protective services agencies. To the fullest extent possible, but consistent with our legal obligation to report suspected abuse to appropriate authorities, we will endeavor to keep the identities of the alleged victims and investigation subject confidential.

Retaliation Prohibited

ProX prohibits any retaliation against anyone, including Covered Individuals, who (1) report or allege incidents of Abuse or Molestation in good faith, or (2) participate in the investigation of a report of Abuse or Molestation. Any person who improperly retaliates against one of the foregoing individuals will be subject to discipline, up to and including termination.

Discipline

Covered Individuals reasonably suspected or believed to have committed Abuse or Molestation will be appropriately disciplined, up to and including termination of employment, contract or program participation and reporting the individual's actions to appropriate law enforcement and/or child protective authorities.

Any Covered Individuals who fail to report Abuse or Misconduct in accordance with this policy will be appropriately disciplined for the failure to report up to and including termination of employment, contract or program participation.

Intentionally false or malicious reports of Abuse or Molestation are prohibited and a violation of this policy. Any individual who makes such a report will also be subject to appropriate discipline.

Appendix 1- Guidelines For Interactions With Students

To protect Interns and Covered Individuals alike, the following guidelines have been established to govern the relationship between Covered Individuals and Interns. These guidelines must be followed when Covered Individuals interact with Interns:

1. Coaches should take proactive steps to avoid being alone in a room with an Intern. There should be at least two adults present for meetings with an Intern. When this is not possible, a Coach should meet with multiple students/Interns at once. In the event a one-on-one meeting between a Covered Individual and an Intern is unavoidable, the meeting should occur in an open-door, well-lit, easily viewable setting.
2. Closed Door Individual Meetings between Covered Individuals and an Intern should be infrequent and rare and should not occur unless the ProX Executive Director is aware of the meeting's purpose and location prior to the beginning of the meeting. The Covered Individual in such a meeting must document the time spent behind closed doors and the specific purpose for such meeting in {{official record keeping system}}. A meeting room that is windowed, highly visible and/or observable should be utilized for such a meeting.
3. In-person Intern activities should always occur in well-lit and easily accessible areas. Intimate or secluded settings are to be avoided.
4. Coaches should generally avoid touching Interns (other than greeting handshakes), especially by initiating contact. If an Intern hugs a Coach, the contact should be shoulder-to-shoulder rather than (face to face). Covered Individuals must honor any "boundaries" regarding contact or reasonable proximity that may be established by an Intern. Patting Interns on the seat as a sign of congratulation or encouragement, as often observed in athletics, is forbidden.
5. Coaches should not visit Interns in the home/residence of any person without first obtaining permission from the Executive Director of ProX. Permission should not be granted unless unusual highly circumstances warrant such permission.
6. Meetings between Interns and Coaches should occur only during publicly posted office hours and all interactions with students should be documented in {{official record keeping system}}.
7. Coaches should use their best efforts to not enter bathrooms with Interns.
8. All ProX Interns are under the legal drinking age. Covered Individuals are prohibited from providing alcohol, pornography or drugs of any kind to any Intern.
9. Coaches should not provide transportation to any Intern. In those rare instances where providing transportation is necessary, the Coach must ensure that another adult is present in the vehicle during the time the Intern is being transported. Coaches should get permission from the ProX Program Manager (Michael Robins- mrobins@kauffman.org or 816-932-1274) prior to transporting a student and the instance of transportation must be documented in {{official record keeping system}}.

10. Coaches should be alert to signs of an Intern being uncomfortable with any Covered Individuals. Coaches should confirm with Interns that they are comfortable working with the individuals the Intern works with at an employer location. Coaches should seek to have different individuals assigned to work with the Intern or to reassign an Intern to a different employer when an Intern shares discomfort.
11. Under no circumstances may Covered Individuals: (i) bring an Intern alone into a Covered Individual's home or rented room, (ii) kiss an Intern, (iii) request personal favors from an Intern, or (iv) intimate that an Intern's completion of a ProX program requirement is dependent on personally pleasing or satisfying the Covered Individuals.
12. The following interactions with an Intern will, in most instances, fall within the definition of Abuse and Molestation and should be avoided:
 - Developing or attempting to develop sexual or intimate social relationships with an Intern, or the family members of an Intern;
 - Intentional physical contact with an Intern that is not invited or results in an injury;
 - Intentional physical contact by a Covered Individual with an Intern involving the breasts, buttocks or pelvic areas;
 - Any otherwise nonerotic activities involving an Intern for which the true intended result is sexual arousal or gratification;