



**SAFE
ENVIRONMENTS**

Code of Conduct



September 2025 Edition

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Boundaries for Prevention

In interactions between adults and minors, there are some behaviours or acts that are considered inappropriate and have potentially negative consequences, even if they are not illegal.

Therefore, an effective child sexual abuse prevention program must begin with adults establishing and adhering to appropriate boundaries that prevent violations and seek the protection, respect and integrity of minors.

Accordingly, the purpose of the Code of Conduct is to establish the appropriate boundaries applicable to staff, volunteers and contractors of the school (in the context of their interactions with the students in the school environment).

Code of Conduct

1. General Conduct for all staff, volunteers and Contractors

1.1 In all circumstances, their behaviour should respect the dignity of all, in such a way that it generates certainty about the good faith, legality and integrity with which they treat others, avoiding situations in which they can violate the established norms in this Code.

1.2 They should not use demeaning or rude language and should omit any expression that could be vulgar, sexist, lewd or that might have explicit, implicit, direct or indirect sexual contact or connotation, in person or by any electronic means.

1.3 They should not possess and/or consume alcohol, addictive substances and/or illicit drugs during work hours **or at any time whatsoever during a working trip with students.** In addition, they must not consume tobacco or utilize e-cigarettes and/or vapes for smoking when in charge of students or in their presence. Under no circumstance can alcohol, tobacco, drugs, or energy drinks be offered to students.

1.4 Pornography is gravely immoral, and child pornography is a crime; in no case will they access pornographic, lewd, or sexual content in the workplace **(including off-site from the Academies, on outings, activities off-site and trips abroad)** or with computers and other devices from the institution.

2. Interaction with Minors

2.1 They should not violate the physical intimacy and personal spaces of the students, particularly in those areas of the body where an expectation of privacy exists.

2.2 In interactions and physical contact with students:

2.2.1 Under no circumstances should staff or other adults touch a student's genitals, buttocks, or chest, nor should they allow a student to touch theirs. Any medical or personal care procedures of an intimate nature must be carried out only by the students themselves (where age-appropriate) or by a qualified medical professional.

2.2.2 They should not caress, touch, rub against, bite, hug, and/or kiss their lips, forehead, neck, shoulders, arms, chest, stomach, legs, or other intimate parts of a student's body where the expectation of privacy exists.

2.2.3 They should not have or allow proximity to the body that may imply invasive closeness or lewd contact.

2.2.4 They should not carry, tickle, place students over their shoulders, or put them on their lap.

2.2.5 They should not change their clothes or undress themselves in the presence of students, nor should they be present when the students are changing or undressing. *For supervisors on duty during student shower time or times when students need to change after clinics, before bed, or other similar situations, please refer to point 2.3.*

2.2.6 They should not physically attack or injure students and should avoid all forms of intense physical contact.

Even in **emergencies**, the norms should be maintained except for providing direct medical attention as necessary. In emergencies, the most qualified person should lead the care needed (school nurse, emergency health worker, Manager, etc.). If no other qualified person is available, care may be provided as necessary until emergency help arrives.

2.3 Those who, because of the nature of their job, work with students during particular periods where they need to be present from a supervision point of view – during shower time (on corridors) or times when they need to change their clothes, going to bed or other similar situations, must ensure that their physical contact is limited to situations in which they must care, supervise, look after and guarantee their safety, hygiene, health and well-being. Under this supervisor role, they must ensure students change in designated areas and never in front of them or fellow students.

2.4 In teaching/learning activities in which physical contact or interaction between adults and students is required, it must be appropriate, reasonable, and proportional to the knowledge or activity that is being taught. These activities should not take place in an isolated manner.

2.5 In academic or recreational activities that involve swimming, they should avoid physical contact in the water, observing a respectful and careful attitude with students.

2.6 When interacting with students, they must choose open areas in which others can see them to avoid situations where they can be isolated.

2.7 In dialogues with students that may imply a personal one-on-one session they, must do this in a visible area (walking through corridors within the school grounds) or in an office with visibility from the outside. If the situation allows it, a third party should be included as a precaution.

2.8 In the case of the sacrament of confession, the confessional must be enabled with a screen or with the proper physical distance between the priest and the penitent. In those places where the confessionals aren't enabled with a screen, the priest must administer the sacrament in an open space so that the interaction with the penitent can be seen clearly.

2.9 To safeguard the healthy development of the students they interact with, the following norms must be observed:

2.9.1 They should not humiliate, disrespect, ridicule, threaten or degrade any student.

2.9.2 They should not tell, make, or send lewd jokes, with double meaning or with sexually explicit, implicit, direct or indirect content, in person or by any physical or electronic means.

2.9.3 They should not look at students' bodies intensely, nor make comments about any aspect of their physical appearance, omitting any lewd expressions or insinuations with explicit or implicit sexual connotation.

2.9.4 They should not accept or give particular or special gifts to students without the consent of their parents or guardians. Awards or incentives given for institutional formative purposes are excluded from this (campaigns or similar initiatives).

2.9.5 They should not reveal personal secrets, nor share problems or personal difficulties, intimate situations or secrets with students.

2.9.6 They should not ask for, grant or accept personal favours for any student.

2.9.7 They must be balanced and just in the way they treat students, avoiding any display of favouritism, preferences or privileges. This also includes selling students any items for money – for example selling food or other items as this would be exploitation of students and is unjust.

2.9.8 They should not record students, nor store photos of them in their personal electronic devices and/or send, share or disseminate them by any physical or electronic means, including social media. For supervisors who are required to take photos on outings, activities, trips, or similar activities, this is only allowed on OAK Ireland devices and photos should only be sent to the official groups, so that they can be shared with parents and used for formal promotion of the Boarding Schools. Under no circumstances are the photos/videos to be shared through personal social media pages such as Instagram, Snapchat, TikTok, etc. Parents do not authorize any photos or videos to be posted outside of the Boarding Schools' formal pages. It is forbidden in any case to take any photos of the students when they are wearing bathing suits, pajamas or any other similar attire. The use of pictures and videos for any purpose is the sole responsibility of the school administration.

2.9.9 They must not show students, nor send or circulate pornographic, lewd, or sexual images, videos, drawings, or audios, real or simulated, by any physical or electronic means, including social media.

2.9.10 Notwithstanding compliance with the institution's rules, they must respect the rules the parents or guardians of the students have established for them; hence they must never ask them to do something against them or that would imply disobedience. In conflicting circumstances, it must be reported to the School Director, so the appropriate guidance measures are implemented in coordination with the students' parents for their well-being.

2.9.11 When it is necessary to correct a student for any inappropriate behaviour, this must be done without imposing sanctions that can cause physical or psychological damage.

2.10 Electronic communications are only allowed through institutional channels provided by the school. In any case, they must ensure that these communications occur strictly for academic or educational purposes in the school context, and they must not contain any form of inappropriate expressions on behalf of the adult. For activities such as outings and trips, staff may only use the agreed institutional communication channels when needed for safety and logistic purposes of such activities and must comply with the above.

2.11 Those who teach students on topics related to sexuality must do this in accordance with the age of the students, focusing on general orientations, always respecting the responsibility of parents and guardians in this area.

2.12 Unless they are assigned, authorized, or certified specifically for it, they will not prescribe the use of or administer medicines, nor will they provide medical attention to a student without the appropriate written consent from their parents, except in cases of medical emergency in which it might not be possible to wait for medical assistance.

2.13 Respecting the Boarding School's rules, they shall never deny food, water or any opportunity to take care of the physical needs of any student, when reasonably requested.

3. Norms and Guidelines for Extracurricular Activities

3.1 When involved in the organization of any kind of extracurricular activity which is outside the normal timetable and that incurs any extra cost for students (such as athletic, educational, spiritual, apostolic, and cultural events) they must adhere to the following criteria:

3.1.1 They must always ask for a parent's or guardian's written consent so the students can participate in such activities.

3.1.2 They must make sure there is a reasonable number of adults supervising the students that allows them to react accordingly in case of an emergency. Also, they must ensure that the gender of those supervising is adequate for the type of activity the students are participating in.

3.1.3 During activities that require to spend the night (such as overnight outings, friendship weekends and trips away).

3.1.4 The bedrooms should never be used to meet or chat with students.

3.1.5 Students should not be allowed to access an adult's bedroom and bathroom, nor should they take students by themselves to isolated or closed areas. In the same vein, adults should not be allowed to access a student's bedroom, unless it is for a safety or medical purpose (take temperature, give medication, or any emergency situation where it is required).

3.1.6 They must have separate rooms from the students but remain close by for security and supervision purposes.

3.1.7 Adult showers and bathrooms must always be separated from those of the students. In case this is not physically possible due to limited space, they must have different showering schedules.

3.1.8 Both the areas for sleeping and bathrooms for men and women must be separated.

3.1.9 In sports activities with students, they must not have intense physical contact with them and shall control their temper.

3.2 When it comes to transportation with students in vehicles:

3.2.1 The driver must have proven capacity to drive (at least a valid driver's license).

3.2.2 In any case, they must always have written authorization from parents or guardians to drive students from one place to another.

3.2.3 Only in case of an emergency can they drive a student in a car by themselves, and the students should always sit in the back seat of the car.

Initial Response and Reporting Procedure

In addition to the irreparable damage in the life of a victim of child sexual abuse, negligence in the attention to and/or cover-up of an act of this nature is a way of generating penal responsibility for any adult responsible for taking care of a student. It is every staff member's duty to know who the Designated Liaison Person (DLP) at OAK Ireland is, who oversees **Safe Environments** in their school, and to report all concerns to that person immediately.

Before working with children in OAK Ireland institutions, all adults should read and familiarize themselves with the Code of Conduct and sign it.

Dos and Don'ts

I. Dos

- Respect the dignity and personal space of all students.
- Establish and maintain appropriate boundaries to protect minors.
- Use respectful, non-degrading language and avoid vulgar or sexually suggestive expressions.
- Refrain from consuming alcohol, tobacco, drugs, or energy drinks during work or around students.
- Avoid accessing or viewing pornographic or sexual content at work or during activities.
- Interact with students in open, visible areas; ensure conversations and activities are conducted publicly.
- Obtain parental consent before giving/receiving gifts or engaging in personal exchanges with students.
- Treat students fairly, avoiding favouritism or privileges.
- Use official school devices and channels for photos, videos, and communication; never share student images on personal social media.
- Ensure physical contact is limited to caring, supervising, or safeguarding activities necessary for safety and hygiene.
- Conduct all interactions with professionalism, especially during religious or confessional activities, ensuring privacy and transparency.
- Follow all safety protocols during extracurricular activities, trips abroad, friendship weekends, outings, and any other overnight stays.
- Obtain written parental approval for extracurricular activities involving costs or overnight stays that were not previously communicated before admittance.
- Ensure proper supervision ratios and gender-appropriate accommodation during overnight or off-site activities.
- Obtain parental consent in the event you need to drive a student in a company vehicle in an emergency, ensuring you have a valid license and a Manager is fully informed.

II. Don'ts

- Do not use demeaning, rude, vulgar, sexist, or sexually explicit language or gestures.
- Never possess, access, or share pornographic or lewd content.
- Do not raise your voice, screaming – any tone that would make a student feel threatened or unsafe.
- Avoid physical contact that invades students' privacy or could be perceived as inappropriate or lewd.
- Do not touch or allow students to touch intimate areas; avoid invasive physical contact.
- Never change clothes or undress in front of students or allow students to do so in your presence.
- Do not physically attack or injure students.
- Do not ever use intense physical contact with a child, for example pushing, hitting, using any type of force to try and move them or get them to do something.
- Do not isolate yourself with students in private or secluded areas, especially during sensitive times.
- Never record, share, or disseminate photos or videos of students on personal devices or social media.
- Do not send or receive inappropriate or sexual communications electronically.
- Avoid any form of favouritism, discrimination, or exploitation of students.
- Do not enter a student's dormitory after lights out unless you need to administer medication or in the event of an emergency. If you need to do so for these reasons, also ensure it is communicated on the general WhatsApp chat.
- Do not enter a student's hotel room or cabin on a trip abroad or Friendship weekend away, unless you need to ensure there are no other children in the room before 'be in rooms' time, or to administer medication, or in the event of an emergency. If you need to do so, for these reasons, also ensure it is communicated on the general/trip WhatsApp chat.
- Do not offer or accept personal favours or gifts without proper authorization.
- Do not take any students' clothes, belongings, or personal items. All students' items are given to charity only at the end of the school year.
- During a trip, or outing, do not ever leave a child alone.
- When you are assigned a team for an outing, trip or similar activities, ensure all students in your care remain under your supervision from the moment you leave the school until the moment you return. No student can ever be left alone.

- If a child wanders off from your team on an outing or trip, communicate it immediately to the person in charge as well as to the general/trip WhatsApp group. Management and parents must be informed.
- Never deny students basic needs like food or water.
- Do not engage in or allow unapproved medical treatments without parental consent.
- Do not give medications to a student unless authorized by the Director, a Manager, or the Nurse.
- Do not sell students any items whatsoever.
- Do not take school food or belongings unless authorized by Management.
- Avoid inappropriate behavior or comments related to students' physical appearance.
- Do not conduct or participate in extracurricular activities without proper consent, supervision, and safety measures.
- Never allow students to access adult bedrooms or private areas except for legitimate reasons like medical emergencies.
- Do not engage in intense physical contact during sports or recreational activities.
- Do not drive students without proper authorization or a valid license, and never drive them alone in non-emergency situations.

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