

TALMUDICAL ACADEMY OF BALTIMORE SCHOOL CONDUCT POLICY AND BEHAVIORAL STANDARDS

I. INTRODUCTION

- A. Talmudical Academy of Baltimore ("<u>TA</u>") is committed to providing a safe and appropriate environment for all TA Staff Members ¹ and TA students. All TA Staff Members and TA students are expected to positively contribute to this environment. To facilitate these contributions, TA has adopted this School Conduct Policy and Behavioral Standards (the "<u>Conduct Policy</u>") setting forth certain responsibilities and obligations of TA Staff Members and TA students regarding interpersonal conduct and relationships.
- B. Childhood, especially adolescence, is often a time of turmoil, distress and conflict. As part of TA's educational goals, all TA Staff Members must encourage TA students' self-confidence and self-competence, and help TA Students grow to increase their potential within their school, family and community. TA students must behave in a manner that facilitates their personal growth and development as well as the growth and development of all TA students.
- C. This Conduct Policy sets forth certain Behavioral Standards, reporting obligations and other responsibilities of TA Staff Members and TA students, and an outline of the procedures available to TA, TA Staff Members and TA students relating to complaints regarding alleged violations of the Behavioral Standards, investigation of such complaints, and enforcement of the Conduct Policy.
- D. Although voluminous rules and procedures could be written for all possible circumstances, this Conduct Policy focuses on situations, which, if unremedied, are likely to be damaging to TA students. The Conduct Policy is not intended to supersede the authority and responsibility of the principals of each division of TA (each, a "Principal") to manage their respective TA divisions on a day to day basis, nor is the Conduct Policy intended to be the sole and exclusive source of rules governing TA personnel and student policies.

Exhibit A includes a definition for this and other capitalized terms.

E. All questions or comments regarding the Conduct Policy may be directed to one or more persons listed on attached Exhibit B.

II. <u>BEHAVIORAL STANDARDS AND OTHER RESPONSIBILITIES</u>

- A. <u>Behavioral Standards</u>. The following behavior is incompatible with TA's educational goals and is therefore always prohibited, without regard to the location (except as set forth in clause "II.A.8(B)" below), time or frequency with which such behavior occurs:
- 1. "Abuse," including (A) physical injury or Mental Injury of any child under 18 by a TA Staff Member or TA student (in each case, without regard to whether such TA Staff Member or student was a TA Staff Member or student at the time such behavior occurs), under circumstances that indicate that the child's health or welfare is harmed or at substantial risk of being harmed; and (B) sexual abuse of any child under 18 by a TA Staff Member or TA student (in each case, without regard to whether such TA Staff Member or student was a TA Staff Member or student at the time such behavior occurs), whether physical injuries are sustained or not, including any act that involves sexual molestation or exploitation, including (without limitation):
- (i) any demeaning or exploitative behavior of a sexual nature, or threats of such behavior;
 - (ii) displaying demeaning, suggestive or pornographic material;
- (iii) improper physical contact, such as inappropriate touching, fondling, patting, pinching, punching or physical assault;
- (iv) indirect or explicit invitations to engage in sexual activities which may or may not include a promise of reward for complying or a threat of reprisal for not complying;
- (v) allowing or encouraging any child to engage in obscene or pornographic photography, films, poses or similar activity, or prostitution;
- (vi) human trafficking, incest, rape, or sexual offense in any degree; and/or
 - (vi) sodomy, unnatural or perverted sexual practices.

Any conduct which meets the preceding definition of sexual abuse shall be prohibited conduct whether or not such conduct was consensual.

2. "Neglect," including leaving any child under 18 unattended, or other failure to give proper care and attention to any child under 18, by a TA Staff Member or TA student (in each case, without regard to whether such TA Staff Member

or student was a TA Staff Member or student at the time such behavior occurs), under circumstances that indicate that the child's health or welfare is harmed or placed at substantial risk of harm, or that Mental Injury to the child, or substantial risk of such Mental Injury, may result.

- 3. "<u>Harassment,</u>" including physical, verbal, visual or behavioral mannerisms or conduct by a TA Staff Member or TA student (in all cases, with or without sexual advances or sexual overtones) that denigrates or shows hostility towards any TA student or TA Staff Member because of such person's sex (excluding sexual orientation), marital status, race, color, national origin, age, or disability where:
- (A) submission to, or rejection of, such conduct is (i) made (explicitly or implicitly) a term or condition of enrollment as a TA student, employment or engagement as a TA Staff Member, participation in TA activities or granting of preferential treatment (for example, awards, recommendations, scholarships); or (ii) used as a basis for evaluation in making personnel or leadership decisions affecting a TA student or a TA Staff Member, or
- (B) such conduct is severe, persistent or pervasive and has the effect of interfering with a TA student's schooling or a TA student's or TA Staff Member's work, participation in TA activities or living conditions, or such conduct creates an intimidating, hostile or offensive educational environment.
- 4. A TA Staff Member mocking, ridiculing, or berating a TA student if such conduct is severe, persistent, or pervasive.
- 5. Any sexual attention by a TA Staff Member to a TA student in the form of remarks, jokes or innuendo about a TA student's body or clothing, or about sexual activity.
- 6. Any psychological manipulation or control of a TA student by a TA Staff Member, including (without limitation) (A) attempting to restrict, rather than widen, the range of resource persons with whom a TA student develops relationships, or (B) attempting to eliminate a TA student's parents as critical influences in the life of the TA Student, or (C) implying that the relationship between a TA Staff Member and TA student is conditional upon the conformity of the TA student to a particular point of view, in each case, if such conduct is severe, persistent or pervasive.
- 7. A TA Staff Member using physical force against a TA student, except (A) to safeguard against immediate physical danger to any person, to a sacred religious object, or to property if the result of damaging such property is reasonably likely to cause physical danger to a person, or (B) normal physical contact (such as hugging or touching) as an act of encouragement or consolation, within the bounds of Halacha and common sense, or (C) normal aggressive contact (such as contact in a basketball or football game, or arm-wrestling), within the bounds of Halacha and common sense.

- 8. "Bullying," including any intentional written, verbal or physical act, or an intentional electronic communication, by a TA Staff Member or TA student, that (A) either (i) physically harms a TA student, (ii) damages a TA student's property, (iii) substantially interferes with a TA student's education or learning environment, or (iv) places a TA student in reasonable fear of harm to such TA student's person or property, and (B) either (i) occurs on TA's property, at a TA activity or event, or on a TA school bus (including a "yellow" bus), or (ii) substantially disrupts the orderly operation of TA. Electronic communication means a communication transmitted by means of an electronic device, including (without limitation) a telephone, cellular phone, computer, or pager.
- B. <u>Student Discipline</u>. TA Staff Members are expected to keep order and control their TA students in a respectful but firm manner. Physical force may never be used to discipline a recalcitrant student.
- C. <u>Parental Influences</u>. If a TA Staff Member is aware that such TA Staff Member's attempt to advise a TA student is causing conflict with the parents of such student, such TA Staff Member must inform such TA Staff Member's Principal who should then consult with the student's parents.
- D. <u>TA Student Behavior</u>. In addition to complying with this Conduct Policy's prohibition against Abuse, Neglect, Harassment and Bullying, each TA student must conduct himself properly at all times in and out of school, in accordance with specific guidelines set forth in various TA student handbooks. The most important elements of proper TA student behavior are (1) treating TA Staff Members and TA students with the personal respect that lies at the heart of healthy personal relationships, and (2) following directions and instructions of TA Staff Members so long as such directions and instructions are not harmful to such TA students or others.
- E. <u>Cooperation</u>. All TA Staff Members and TA students are required to fully cooperate with any and all Investigations, including, without limitation, disclosing all relevant information of which they are aware to Principals, the individual serving as TA's Ombudsman (the "<u>Ombudsman</u>"), TA's Chairman of the Board (the "<u>TA Chairman</u>"), TA's Executive Board of Directors (the "<u>TA Executive Board</u>"), any committee of the TA Executive Board, or any other person selected by the Ombudsman to conduct an investigation (an "Investigator").
- F. False Reports. While reporting violations of this Conduct Policy is encouraged and required, TA Staff Members, TA students, and parents of TA students are expected to understand that false reports of violations of this Conduct Policy are likely to be damaging to the individual falsely accused. Consequently, all TA Staff Members and TA students are prohibited from knowingly making a false report of any violation of this Conduct Policy.
- G. <u>Training and Compliance</u>. All TA Staff Members are required to attend all training programs relating to this Conduct Policy to be provided from time to time by

TA. In addition, all TA Staff Members are required to know and comply with all provisions of this Conduct Policy.

III. <u>REPORTING OBLIGATIONS</u>

- A. <u>General</u>. All TA Staff Members and TA students recognize and understand that none of the reporting obligations set forth in this Conduct Policy constitutes impermissible Lashon Hara or any other violation of other Halachos of Proper Speech. TA will not (and TA Staff Members and TA students shall not) retaliate in any way against any TA Staff Member, TA student or parent of a TA student who, in good faith, (1) reports a violation of this Conduct Policy by a TA Staff Member or TA student, or (2) cooperates with any investigation of any suspected violation of this Conduct Policy.
- B. Reporting to TA. Any TA Staff Member or TA student who has reason to believe that conduct by a TA Staff Member or TA student constitutes a violation of any of the Behavioral Standards must report the alleged conduct immediately (in the case of a TA Staff Member with such belief) or as soon as reasonably practicable (in the case of a TA student with such belief). Such Report must be made either (1) orally, to the Ombudsman (by leaving a voicemail message at the Ombudsman's phone number listed on Exhibit B) or to any Principal (by leaving a voicemail message at such Principal's phone number listed on Exhibit B), or (2) in writing (using the report forms available from the TA administrative offices or website at www.talmudicalacademy.org), to the Ombudsman and to any Principal (in each case, by delivering a completed copy of the report via email to the address of the Ombudsman and any Principal set forth in Exhibit B).
- C. Reporting to Government. Each TA Staff Member is required to be aware of, and comply with, legally mandated reporting requirements in the event such TA Staff Member has reason to believe that (1) a TA Staff Member or TA student has committed Abuse or Neglect, or (2) a TA student is a victim of Abuse of Neglect.
- 1. Currently, Maryland law does not require proof that Abuse or Neglect has occurred before reporting a suspected incident, and incidents must be reported as soon as there is reason to believe that Abuse or Neglect has occurred. A TA Staff Member who fails to report suspected Abuse or Neglect may be subject to professional sanctions by applicable licensing boards, in addition to action by TA in accordance with Section V of this Conduct Policy. Failure to report may be prosecuted under certain circumstances.
- 2. In addition to, and without limiting, the reporting obligations set forth in the preceding clause "III.B," Maryland law requires TA Staff Members to make an oral and written report to the local department of social services, or, in the case of Abuse, to local law enforcement, in each case, as soon as possible and not later than 48 hours after the contact that revealed the suspected Abuse or Neglect. If the following information is known by the reporting TA Staff Member, it must be included in any report: (A) names and home addresses of the TA student, both parents and any other

individual responsible for the care of the TA student; (B) the present location of the TA student; (C) the names and ages of other children in the home; (D) the specific nature and extent of Abuse or Neglect; (E) any information known to the reporting TA Staff Member of possible previous Abuse or Neglect; and (F) any information that would help determine (i) the cause of the suspected Abuse or Neglect, and (ii) the identity of any individual responsible for the suspected Abuse or Neglect.

- 3. The United States Department of Health and Human Services offers the following website and hotline for information on applicable laws at http://www.childhelpusa.com and 1-800-4-A-CHILD (1-800-422-4453). The State of Maryland website is at http://www.dhr.state.md.us.
- 4. In the event a TA Staff Member is the person alleged to have committed Abuse or Neglect with respect to a TA student, a Principal shall, if given permission by the investigating government agency, promptly (normally prior to the end of the next school day) inform the TA student's parents/legal guardians of the situation and the referral to the investigating agency.
- 5. Maryland law (A) provides immunity for persons reporting Abuse or Neglect, in good faith, and (B) prohibits an individual from intentionally preventing or interfering with the making of a report of suspected Abuse or Neglect required by law.
- 6. Maryland law provides that a TA Staff Member (who is an employee of TA) who reports an act of Bullying in accordance with this Conduct Policy is not civilly liable for any act or omission in reporting or failing to report an act of Bullying in accordance with such Conduct Policy.
- D. <u>TA Student Misconduct</u>. In the event a TA student commits any act of misconduct, the Principals have responsibility to inform the parents of such TA student regarding such misconduct, especially any misconduct that may lead to a TA student's suspension or expulsion, even if such misconduct is not illegal. Principals may seek assistance, if necessary, from mental health professionals or other outside consultants.
- E. Ombudsman. The TA Executive Board created the Office of the Ombudsman to receive Reports, coordinate Investigations, report the findings of Investigations to the TA Chairman, and perform other functions set forth herein. The Ombudsman is appointed by vote of the TA Executive Board, on a yearly basis, and serves at the discretion of the TA Executive Board. All Reports of violations of any of the Behavioral Standards by the Ombudsman must be made directly to the TA Chairman.
- F. <u>Confidentiality</u>. The existence and contents of any Report (including, without limitation, the names of the person making the Report, the alleged violator and alleged victim) may be disclosed by TA, a TA Staff Member, a TA student, and/or other persons acknowledging acceptance of this Conduct Policy (in accordance with Section VI.E. hereof) only to the extent (1) necessary for the Investigator to fully investigate allegations in the Report, (2) necessary for TA to take disciplinary and other actions in

response to such Report, and/or (3) otherwise permitted by law (solely in the case of disclosure by TA) or otherwise required by law (in all other cases).

IV. SUSPECT PERSONS

- A. For purposes of this Conduct Policy, a "Suspect Person" includes an individual who meets both of the following criteria: (1) the individual is, or ever was, the subject of a law enforcement investigation with respect to a crime either (A) of a sexual nature (including, for example, any crime for which an individual is, or if convicted would be, listed on the State of Maryland Sex Offender Registry) or (B) involving a substantial risk of physical harm to children under 18 (including, for example, Abuse, Neglect, drug abuse, drunk driving, etc.); and (2) such individual is a TA Staff Member, TA student, "Close Relation" (as defined herein) of a TA Staff Member or a TA student, or otherwise resides within a one-half mile radius of TA. The term "Close Relation" includes (i) any individual who resides with a TA Staff Member or a TA student, and (ii) any sibling, parent, grandparent (residing in the greater Baltimore Maryland metropolitan area), child or spouse of a TA Staff Member or TA student.
- B. Any TA Staff Member, TA Executive Board member, or TA student who has reason to believe that an individual is a Suspect Person, and any Suspect Person himself or herself, must immediately make a Report with respect to such Suspect Person. Such Report must be made in the same manner as other Reports under this Conduct Policy (orally or in writing, to the Ombudsman or any Principal, etc.).
- C. A Report with respect to a Suspect Person must be investigated in the same manner as other Reports under this Conduct Policy (Ombudsman to appoint an Investigator, etc.). In connection with any such Investigation, the Ombudsman or other Investigator may also (1) identify any existing limitations, restrictions or prohibitions on the Suspect Person with respect to schools and/or children, and (2) interview the Suspect Person and/or other Close Relations with respect to the applicable TA Staff Member or TA student.
- D. Pending completion of an Investigation, (1) on a weekly basis, the Ombudsman shall inform the TA Chairman of the status of the Investigation, and (2) the TA Chairman and/or the TA Executive Board may take such immediate action as they deem appropriate, in their sole discretion, to protect TA Staff Members, TA students and other persons (in the case of any "Disclosure" (as defined herein), subject to Section IV.E(2) below.
- E. Upon completion of the Investigation (as determined by the Ombudsman and the Investigator), the Ombudsman and the Investigator shall report the findings of the Investigation to the TA Chairman. Upon receipt of the findings of the Investigation, the TA Chairman and/or the TA Executive Board shall take such action as they deem appropriate, in their sole discretion, including, for example, (1) taking no action, (2) creating and imposing limitations, restrictions or prohibitions on the Suspect Person's

access to TA's premises, TA's functions or events, TA Staff Members and/or TA students, and/or any other action to protect TA Staff Members, TA students and/or other persons, and/or (3) disclosing (to TA Staff Members, TA students and/or other persons) the existence and contents of the Report, the Investigation (including, for example, the findings thereof), and/or any actions thereon taken by the TA Chairman and/or the TA Executive Board (a "Disclosure").

- 1. In all cases, the Investigator, the TA Chairman and the TA Executive Board may consider all facts and circumstances, including, for example, (A) the nature, time and circumstances of the crime committed, or alleged to have been committed, by the Suspect Person, (B) the past and current status of the handling and treatment of such crime by law enforcement and/or other officials within the criminal justice system, and (C) the relationship between the Suspect Person and the applicable TA Staff Member or TA student.
- 2. Prior to any Disclosure by TA (except any Disclosure necessary for the Investigator to fully investigate a Report), (A) the Ombudsman (or his designee) and the TA Chairman (or his designee) must consult with Rabbi Shmuel Kamenetsky (or his designee), and (B) unless Rabbi Shmuel Kamenetsky (or his designee) determines that a Disclosure is Halachically prohibited, a decision to make a Disclosure must be approved by either (i) the TA Chairman and a majority or more of the members of the TA Executive Board entitled to vote, or (ii) two-thirds or more of the members of the TA Executive Board entitled to vote. Any individual who makes a Disclosure without such approval is subject to any and all remedies available to TA.
- 3. In the event the TA Chairman and/or the TA Executive Board take any action hereunder, (A) the Suspect Person may be required to agree, unconditionally, to such action (such agreement to be memorialized in a manner selected by the TA Chairman and/or the TA Executive Board, in their sole discretion), and (B) such agreement (and memorialization) by the Suspect Person may be a condition to admission (or continued enrollment) of the applicable TA student, or hiring (or continued employment or other relationship) of the applicable TA Staff Member.
- 4. TA shall have the right (but no obligation) to periodically reassess the status of a Suspect Person, and take any and all actions with respect to such reassessment consistent with the Conduct Policy.

V. INVESTIGATION AND ENFORCEMENT

A. Ombudsman and Principals. No later than one business day after receipt of any Report, the Ombudsman and/or any Principal receiving such Report shall notify each person listed on Exhibit B of the existence of such Report, and, in the event the Report was made in writing, circulate a copy of such Report to all such persons. Alternatively, in the event the Report was made orally, the Principal supervising the alleged violator (either a TA Staff Member or TA student) shall prepare a written version of the Report (with input from the person or persons making such oral Report) and circulate it to all such persons. In the event a Principal is the alleged violator, such

Principal shall be treated in the same manner as any other TA Staff Member who is the alleged violator. In the event a person listed on Exhibit B is a parent, grandparent, child, spouse, sibling, aunt, uncle or first cousin of either the alleged violator or the alleged victim, such family member shall not receive such Report, and shall not be involved in any related Investigation, determination and action.

- B. <u>Investigator</u>. As soon as practicable after receipt of a Report, the Ombudsman, in consultation with TA's legal counsel and one or more Principals, shall (1) make a determination as to whether an Investigation of the Report will be conducted by one or more Principals, the Ombudsman, or a third party Investigator selected by the Ombudsman, and (2) appoint one or more persons (who may, but need not, be the Investigator) to be TA's authorized spokesperson and point of contact for any and all communications regarding the Investigation (such spokesperson to communicate with the alleged violator and alleged victim at least weekly). An Investigation by TA may not occur with respect to any Abuse or Neglect requiring immediate referral to the local department of social services or law enforcement, until TA is cleared to do so by any such government agency.
- C. <u>Investigation</u>. The Investigation shall be initiated and conducted in a reasonably expeditious manner, and may consist of (1) personal interviews with the person making the Report, the alleged violator, the alleged victim, and all other persons the Investigator determines may have relevant knowledge, (2) inspection and review of any files, e-mails and other documents deemed relevant by the Investigator, and/or (3) any other methods deemed appropriate by the Investigator.
- D. <u>Experts</u>. In connection with any Investigation, the Ombudsman may arrange to have TA engage experts (for example, mental health professionals, attorneys, and/or rabbis) to assist the Investigator in conducting the Investigation.
- E. <u>Interim Actions</u>. Pending completion of an Investigation, (1) on a weekly basis, the Ombudsman shall inform the TA Chairman of the status of the Investigation, and (2) the TA Chairman and/or the TA Executive Board may take such immediate action as they deem appropriate, in their sole discretion, to protect the alleged victim of the alleged violation of Behavioral Standards and other persons.
- F. <u>Determination and Enforcement.</u> Upon completion of the Investigation (as determined by the Ombudsman and the Investigator), the Ombudsman and the Investigator shall report the findings of the Investigation to the TA Chairman. Upon receipt of the findings of the Investigation, the TA Chairman and/or the TA Executive Board shall take such action as they deem appropriate, in their sole discretion, including, without limitation, taking no disciplinary action, or alternatively, issuing a warning, suspending the violator, terminating the employment or other relationship between TA and such violator, or any other action to prevent any recurrence of the applicable violation of the Behavioral Standards. In all cases, the Investigator, the TA Chairman and the TA Executive Board may consider all facts and circumstances including, without limitation, (1) the nature, time and frequency of the behavior, (2) past incidents or

patterns of behavior, (3) the relationship between the parties, (4) the context in which the behavior occurred, and (5) applicable laws.

G. Other Actions and Enforcement. In the event the TA Chairman and/or the TA Executive Board determines that a TA Staff Member or TA student has violated any such person's obligations set forth in this Conduct Policy (other than violations of the Behavioral Standards), the TA Chairman and/or the TA Executive Board shall take such action as they deem appropriate, in their sole discretion, including, without limitation, issuing a warning, suspending the violator, terminating the employment or other relationship between TA and such violator, or any other action to prevent any recurrence of the applicable violation of this Conduct Policy.

VI. <u>MISCELLANEOUS</u>

A. <u>Amendment and Termination</u>. The TA Executive Board may modify or terminate this Conduct Policy, or any portion thereof, at any time, with or without notice.

B. Dispute Resolution.

- 1. In the event of any dispute between TA, on the one hand, and any TA Staff Member, TA student or any other person, on the other hand, relating to this Conduct Policy (other than disputes regarding factual issues, with respect to which the findings, if any, of the Investigator shall be deemed conclusive and binding on all parties), all parties shall use good faith efforts to resolve such dispute; provided, that if such parties do not resolve such dispute within ten (10) days after any party notifies the other parties, in writing, of such party's intent to submit the dispute to arbitration pursuant hereto, such dispute shall be submitted by all parties to arbitration by Rabbi Shmuel Kamenetsky or his designee (the "Arbitrator") in accordance with such rules as may be established by the Arbitrator. The Arbitrator's decision in any such arbitration shall be binding and enforceable by a court of competent jurisdiction. Each party shall be responsible for its own fees, costs and expenses in connection with such arbitration, and each party shall be responsible for one-half of the Arbitrator's fees.
- 2. Subject to the preceding clause "VI.B.1," any suit involving any dispute arising under this Conduct Policy may only be brought in the United States District Court for the Northern District of the State of Maryland, or any State of Maryland court having jurisdiction over the subject matter. TA Staff members, TA students and other persons acknowledging acceptance of this Conduct Policy (in accordance with Section VI.E hereof) hereby (i) consent to such jurisdiction, and (ii) waive any and all rights which they may have to request a jury trial in any proceeding at law or in equity.

- C. <u>Interpretation</u>. In the event of any conflict or inconsistency between this Conduct Policy and any other TA rules governing TA personnel and/or student policies, this Conduct Policy shall control.
- D. <u>Separability</u>. Each provision of this Conduct Policy shall be considered separable, and if, for any reason, any provision hereof is determined to be invalid and contrary to any existing or future laws, such invalidity shall not impair the operation of (or affect) those provisions of this Conduct Policy which are valid.
- E. <u>Acknowledgment</u>. TA reserves the right to require, from time to time, any and all TA Staff Members, TA students, parents of TA students and certain other persons to acknowledge, in writing, receipt of a copy of, and acceptance of all provisions of, this Conduct Policy.

F. Status.

- 1. Adopted by TA Executive Board on June 19, 2007.
- 2. Updated EXHIBIT B on July 11, 2008.
- 3. Amended by TA Executive Board on August 23, 2012.
- 4. Amended and Restated by TA Executive Board on November 5, 2013
- 5. Updated EXHIBIT B on November 7, 2016.

TALMUDICAL ACADEMY OF BALTIMORE SCHOOL CONDUCT POLICY AND BEHAVIORAL STANDARDS

EXHIBIT A

Definitions

"Abuse" means (i) in the case of conduct engaged in by a TA Staff Member or TA student, the conduct described as "Abuse" in Section II.A of this Conduct Policy, and (ii) in the case of conduct engaged in by any other person who has permanent or temporary care or custody or responsibility for supervision of a child, or any family member of a child, the same conduct described in the preceding clause (i) engaged in by any such other person.

"Behavioral Standards" means, collectively, the behavior prohibited in Section II.A of this Conduct Policy.

"Investigation" means the investigation of any Report, in accordance with Section V of this Conduct Policy.

"Mental Injury" means the observable, identifiable and substantial impairment of a child's mental or psychological ability to function.

"Neglect" means (i) in the case of conduct engaged in by a TA Staff Member or TA student, the conduct described as "Neglect" in Section II.A of this Conduct Policy, and (ii) in the case of conduct engaged in by any other person who has permanent or temporary care or custody or responsibility for supervision of a child, the same conduct described in the preceding clause (i) engaged in by such other person.

"Report" means an oral or written report (with respect to any alleged violation of the Behavioral Standards) made by a TA Staff Member or TA student in accordance with Section III.B and/or IV.B of this Conduct Policy.

"TA Staff Member" means each full-time or part-time teacher, counselor, social worker, administrator, clerk, custodian or other employee of TA, and any independent contractor or volunteer engaged by TA to interact with TA students.

TALMUDICAL ACADEMY OF BALTIMORE SCHOOL CONDUCT POLICY AND BEHAVIORAL STANDARDS

EXHIBIT B

Contact Information

Phone

Email

Principal

| High School Judaic High School Secular Middle School Judaic Middle School Secular Elementary School Judaic Elementary School Secular | Rabbi H. Dudovitz | (410) 484-6600 x331 | hdudovitz@talmudicalacademy.org |
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Program