

INCLUSION POLICY

1 PHILOSOPHY

Ecole Jeannine Manuel is committed to providing a safe, open and inclusive working and learning environment, where all members of the community are given the opportunity to achieve their full potential. For students meeting admission criteria, inclusive learning arrangements are provided. Embracing a diversity of cultures and identities is at the heart of our mission. The School firmly believes that everyone is equal in dignity and in their rights, and that students who learn, live, and grow together are more likely to embrace their differences and include one another. In accordance with French law, the School maintains strict neutrality with respect to political and religious convictions.

2 POLICY AIMS AND OBJECTIVES

The purpose of this policy is to outline how our School strives to create an environment in which all stakeholders feel safe, respected, and supported in their learning. The School strives to:

- Ensure that every member of the learning community is respected, included, and fairly treated,
- Create a healthy environment for work and study in which all members of the learning community feel safe to express their full identities, while respecting the right of all others to also feel safe and respected,
- Promote a culture of kindness, openness and empathy,
- Foster open and transparent communication between all members of the community,
- Support students requiring inclusive learning arrangements,
- Encourage consistency of response to both positive and negative behavior,
- Provide a safe environment free from disruption, violence, bullying, discrimination and any form of harassment, as defined in Section 3.

3 DEFINITION OF TERMS

3.1 Inclusion

Inclusion, as defined by the Council of International Schools, “refers to behavioral practices and social norms in a community that are co-productive, including and integrating everyone in activities and processes so they feel a sense of belonging and purpose.”¹

3.2 Bullying

Bullying is a term that is generally applied to acts of intimidation or exclusion in a school setting and refers to any intentional act that is severe, persistent or pervasive and/or which exploits a real or perceived imbalance of power, causing emotional, psychological or physical harm to another person. Power may refer to age, size, strength, gender, sexual orientation, ability, position or popularity but can also include other situations.

¹ Council of International Schools Briefing: I-DEA, Inclusion via Diversity, Equity, and Anti-Racism, April 2022.

It is important to understand the difference between bullying and conflict. A conflict is a disagreement or argument in which both sides express their views. People in conflict generally stop and change behavior when they realize it is hurting someone. In bullying, the goal is to hurt, harm or humiliate.²

Bullying can take on several forms:

- **Relational aggression** is an indirect form of bullying that occurs when someone manipulates or harms another person's relationship(s), reputation, social status or self-esteem. Persistent, intentional exclusion is a form of bullying through relational aggression.
- **Physical aggression** refers to the intent to harm someone through physical force or dominance.
- **Verbal bullying** occurs when a person uses spoken or written words to hurt someone else.
- **Sexual bullying** involves unwanted sexual suggestions, comments, jokes, gestures, advances, contact or threats to another person. All stakeholders must understand that the possession and/or distribution of explicit images of a minor is a crime.

3.3 Harassment

Harassment is a term used primarily in the workplace and refers to any verbal or nonverbal action that frightens, intimidates or causes emotional distress to another person. Harassment of any individual upon the basis of their real or perceived national or ethnic origin, sex, religion, age, disability, sexual orientation, gender identity, gender expression, political affiliation, socioeconomic status, civil status, employment status, preferred language or language proficiency, appearance, height or weight is a violation of their human rights and of French law.

3.4 Discriminatory Behavior

Discriminatory behavior refers to any verbal or non-verbal bullying which causes harm, exclusion, or unequal treatment and is motivated by prejudice based one of the [25 criteria protected by French law](#), including: a person's real or perceived national or ethnic origin, religion, sex, age, disability, sexual orientation, gender identity, gender expression, political affiliation, socioeconomic status, civil status, employment status, preferred language or language proficiency, physical appearance, or political or philosophical opinions. Beyond the school setting, this is referred to as discrimination and can take on any of the previously mentioned forms. It is included in the general definition of *harcèlement* in French, and does not have to occur more than once to be considered to be a violation of human rights and of French law.

3.5 Cyber-Bullying, Cyber-Harassment, or Cyber-Discrimination

Cyber-bullying, cyber-harassment, and cyber-discrimination refers to any of the actions described in items 3.2 - 3.4 occurring online or using communication technology, including through email, text messaging, individual or group chats, websites, discussion forums, or any type of social media.

² Definition taken from <https://www.pacer.org/bullying>

4 RESPONSIBILITIES, EXPECTATIONS, PREVENTION

4.1 General Responsibilities and Expectations

All members of the learning community, including students and staff, are expected to:

- Treat others with respect, courtesy and consideration at all times;
- Refrain from using disrespectful language of any kind;
- Contribute positively to the learning atmosphere in and out of class by arriving on time, actively engaging, concentrating, completing work on time, and interacting with others in a positive and respectful manner;
- Respect school property and the property of other members of our learning community;
- Be familiar and comply with the Child Protection Policy;
- Be familiar with the signs and behaviors section of the Child Protection Policy, which indicate how to detect that someone may be experiencing bullying, harassment or discrimination/discriminatory behavior;
- Be familiar with this Inclusion policy and the procedure for any infractions to this policy;
- Understand, avoid, and report bullying, harassment or discriminatory behavior as defined in Section 3;
- Feel confident that instances of bullying, harassment, or discriminatory behavior will be investigated swiftly, sensitively and effectively and that targets will be supported, knowing that our School considers any language or behavior that is inconsistent with its values as grounds for disciplinary action;
- Feel confident that any investigation of behavior violating this policy will be prompt, thorough, fair and well-documented;
- Be aware that this policy covers individual behavior on or off school grounds, at school-sanctioned events, and incidents occurring online.

4.2 School Responsibilities and Expectations

All members of the learning community can expect the School to:

- Clearly communicate and explain both the Inclusion Policy and the Child Protection Policy to all members of the learning community, as well as the consequences for non-compliance with these policies;
- Foster a growth mindset and encourage all members of the learning community to celebrate differences as a source of strength for our community
- Provide a School Nurse and a School Counselor (*Point Ecoute*) to provide physical care and mental health support for students, and refer students to outside medical professionals when required;
- Promote inclusive practices and a culture of trust within the framework of this policy,
- Consider any language or behavior that is in violation of this policy as grounds for disciplinary action;
- Investigate instances of bullying, harassment or discriminatory behavior swiftly, sensitively and effectively;
- Administer fair and consistent consequences for instances of bullying, harassment, and discriminatory behavior, as defined in section 3;
- Strive to promote a safe, open, and inclusive learning environment through evidence-based prevention and intervention strategies and initiatives such as:

- PSHCE (Personal, Social, Health, and Citizenship Education) and Wellbeing programs, which cover
 - Age-appropriate education regarding racism, antisemitism, sexism, anti-LGBTQIA+ discrimination, and other forms of discrimination,
 - Age-appropriate instruction on recognizing signs of bullying, harassment, and discriminatory behavior,
 - Age-appropriate instruction on best practices to create an inclusive environment,
 - Age-appropriate instruction on sex, interpersonal relationships, and the importance of consent,
 - Age-appropriate instruction in responsible digital citizenship and media literacy,
- Teacher training on differentiation and universal design for learning, and which support the diverse backgrounds and experiences of our community, by including
 - Relevant curricula, materials and texts that incorporate diverse perspectives
 - Relevant curricula, including Learning to Learn and Study Skills classes to foster student autonomy, organization, motivation,
 - Literature, outings, trips, cultural exchanges and other resources to promote cultural and social awareness.
- Affinity and alliance groups,
- School-wide awareness campaigns to promote inclusion and solidarity, particularly in conjunction with UNESCO's International Day Against Violence and Bullying at School in November and International Day for the Elimination of Racial Discrimination in March. .
- Staff training in and implementation of Pikas' Method of Shared Concern (adapted to the French context by Jean-Pierre Bellon and Marie Quartier as the *Méthode de préoccupation partagée*) where applicable to quickly defuse situations of intimidation among students so as to end the suffering of the target.
- To seek immediate help by contacting the designated child-protection officer (CPO) and/or their deputy if a child talks about suicide or seems unusually upset,
- To review and, if necessary, amend this policy.

4.3 Student Responsibilities and Expectations

Students are expected to

- Be familiar with this policy and with the Child Protection Policy,
- Understand the good practices surrounding inclusion,
- Work responsibly with others in the learning community, engaging in transparent communication,
- Adopt a growth mindset and strive to be open-minded and embrace one another's differences, acknowledging that differences make our community richer,
- Understand the definitions of inclusion, bullying, harrassment, and discriminatory behavior as explained in Section 3,
- Not engage in intimidation, exclusion, bullying, harrassment, and discriminatory behavior towards any member of the learning community,

- Understand the consequences for instances of bullying, harassment, or discriminatory behavior as outlined in Section 6,

4.4 Family Responsibilities and Expectations

Families are expected to

- Be familiar with this policy and with the Child Protection Policy,
- Understand the good practices surrounding inclusion,
- Encourage their children to adopt a growth mindset, to strive to be open-minded and embrace one another's differences, acknowledging that differences make our community richer,
- Support and encourage their children to work responsibly with others in the learning community, engaging in respectful and transparent communication,
- Understand the definitions of bullying, harassment, and discriminatory behavior as explained in Section 3,
- Support their children in avoiding intimidation, exclusion, bullying, harassment, and discriminatory behavior towards any member of the learning community,
- Understand Pikas' Method of Shared Concern and support the School in applying it,
- Support the School's consequences for violations of this policy as outlined in Section 6.

5 INCLUSIVE LEARNING ARRANGEMENTS

In addition to the points outlined above, the School is also committed to ensuring that all students meeting admission criteria (as described in the Admission Policy) are able to demonstrate their ability under assessment conditions that are as fair as possible. To do this, the School strives to use a variety of methods of assessment including oral, written, individual, group work, self-assessed, peer-assessed, short-term and long-term assignments.

The School undertakes a graduated approach to the identification, assessment and support of students who are not meeting academic expectations or showing signs of distress. The approach recognizes that there is a wide variety of learning support requirements. Students may receive learning support such as peer-tutoring or office hours, or be referred to a medical professional as necessary.

5.1 Individualized Education Plan (*Plan d'accompagnement personnalisé*)

When standard assessment conditions put students at a disadvantage, and where a need has been identified by both the School and/or a medical professional, assessment tasks may be adapted, using a range of strategies such as access to a computer, extra time or rest breaks, to allow students to demonstrate learning. From grade 9, when students start taking official examinations, students requiring inclusive learning arrangements will work with the Head of Sector, the family and the family doctor to elaborate an Individualized Education Plan (IEP in English, or *PAI* or *PAP* in French). Through the end of Grade 8, this is managed through skills-focused learning and differentiated instruction and universal design for learning.

For an IEP to be developed, students must have formal documentation from a medical professional. The IEP will be approved by the Head of Sector in consultation with the parents, the teachers and the student. The IEP will highlight the student's areas of required support and accommodations required to assist the student's learning and will be shared with all School staff that work with the child.

5.2 Inclusive Access Arrangements in the IB Diploma Program

In addition to the procedures outlined in Section 4 above, IBDP students experiencing social, emotional, behavioral, learning, or medical challenges may be able to benefit from Inclusive Access Arrangements for both mock and official Baccalaureate exams, requested to the IB by the IB Coordinator. In order for a request to be submitted to the IB, rigorous and thorough medical and school evidence is required.

Inclusive Access Arrangements will typically include one of the following (with one arrangement often removing the need for another):

- additional time in written exams and/or coursework,
- use of a computer for written exams,
- rest breaks during written exams,
- specific placement in a room during exams,
- special consideration (D2 form): in the event that a significant circumstance (physical or mental illness or injury, extraordinary personal situation) affects a candidate in the weeks leading up to the final Baccalaureate exams, the IB Coordinator may request special consideration for adverse circumstances.

6 RESPONDING TO VIOLATIONS OF THE INCLUSION POLICY

The School strives to deal with problems swiftly, sensitively, discreetly and effectively, using Pikas' Method of Shared Concern where applicable, and keeping parents informed when appropriate.

Any incident of intimidation, exclusion, bullying, harassment, or discriminatory behavior, involving a student should be treated as a child protection concern when there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm'. In these instances, the situation must be referred immediately to the School's Child Protection Officers, namely the Head of School and the School Nurse.

Minor incidents or conflicts that can be resolved immediately and do not meet the definition of bullying, harassment or discrimination require no further action under this policy and may or may not be documented.

Although the School will take pro-active measures, as outlined in Section 4, to prevent bullying, harassment and discriminatory behavior, the school will respond in a measured fashion, following the relevant policies and procedures outlined below when such behaviors are identified:

- If bullying, harassment, or discriminatory behavior is suspected or reported, the member of staff who has been approached will deal with the incident immediately by informing the appropriate Division Head or Human Resources.
- All members of the school community—no matter their position, terms of employment or role at the School—shall be given unwavering support if they experience bullying, harassment or discrimination at the hands of another member of the learning community. Individuals filing a report of misconduct shall not be subject to any retaliation whatsoever.
- All staff members may intervene if they witness or receive reports of misconduct.
- Witnesses and bystanders have a responsibility to immediately contact a trusted staff member with any concern for a School member's safety or wellbeing, including in-person or online incidents of bullying, harassment or discrimination directed against any member of the learning community.
- A clear and precise account of the incident will be recorded in writing and given/sent to the Head of Sector (or Head of School) and the Homeroom Teacher of the students involved. The Head of School shall be notified of all instances of bullying, harassment or discriminatory behavior concerning an adult.
- Where an event is too serious for the Method of Shared Concern to be applicable, the Head of School will investigate (or delegate this responsibility to another member of staff). An action plan will be considered, which may include individually interviewing those concerned, in the presence of two staff members to discuss the incident. Any investigation will be recorded.
- A clear, factual and precise account of the incident will be recorded in writing and given/sent to the CPO (or a Deputy Head) and the Homeroom Teacher if a student is involved.
- If necessary and appropriate, the police will be consulted as required by French law.

- After the investigation is complete and the incident dealt with, staff will ensure that repeated bullying will not take place.
- The Head of School will be informed of the outcome as well as the relevant members of staff (for example, the Homeroom Teachers of the students involved). A copy of all relevant documents should be retained on the School's files.

Investigation

- The Head of School or designee shall lead a fair, thorough, objective and well-documented investigation of any complaints that meet the definition of bullying, harassment or discrimination. Parent/legal guardian(s) of students involved will be kept informed as appropriate.
- In addition, all reporting, investigations and responses shall be consistent with French law regarding anti-discrimination and the protection of civil and human rights. If necessary and appropriate, the police will be consulted.
- Within one working day of receiving a complaint or incident report, the Head of School or designee will notify relevant staff members or the parent/legal guardian(s) of any students involved, as appropriate, that a complaint was received and direct them to this policy.
- During the investigation, the School shall take prompt and reasonable measures to protect the supposed targeted individuals of bullying, cyber-bullying, harassment, intimidation and/or retaliation. A temporary action plan may include but not be limited to changing seating arrangements or schedules of the alleged aggressor, implementing a School no-contact order or agreement.
- Supposed targets and intimidators have a right to be accompanied by a trusted adult of their choice throughout the reporting and investigative processes. The investigation may require individual meetings with each student or staff member involved in the presence of two additional staff members. The School will keep a record of all meetings and discussions.
- The School shall respect the privacy of the supposed targets or intimidators as far as possible. Limited disclosure may be necessary in order to conduct a thorough investigation.
- Once the investigation is complete, the School will respond in writing and/or in person to targeted adults or the parent/legal guardian(s) of targeted students, outlining any disciplinary measures taken and/or any other appropriate recommendations.
- Disciplinary Actions (students) – Age-appropriate disciplinary measures taken may include but are not limited to:
 - Community service - Examples may include: research, presentations, raising awareness among peers, involvement in awareness-raising events.
 - Official warnings,
 - Disciplinary hearing,
 - Temporary suspension,
 - Permanent expulsion.
- Disciplinary Actions (employees) – Employee misconduct with regard to this policy will be treated in accordance with French labor law requirements.
- **Retaliation and False Reports** - No person who, in good faith, reports or provides information related to suspected bullying or harassment following this policy shall suffer retaliation, harassment or any adverse employment or enrollment action. Any

person making such a report or providing information in bad faith, or with the knowledge that it is false, shall be subjected to disciplinary measures. In cases where a law has been violated, law enforcement will be notified.

7 CONCLUSION

- The School seeks to promote a culture of kindness and create a respectful and healthy environment for work and study. In spite of this, discriminatory behavior and/or harassment can occur and it is important not to ignore it. All stakeholders must act promptly and decisively when incidents of discriminatory behavior and/or harassment are encountered.
- The School seeks to encourage good lines of communication between students, staff, parents and the School.
- Informing new staff and training staff is of paramount importance in this matter.
- The School rules and sanctions, in appropriate circumstances, may regulate the conduct of students when they are away from School premises and outside the jurisdiction of the School.
- Keeping accurate records to identify patterns of behavior, to measure the effectiveness of the School's approach to discriminatory behavior and/or harassment and revise areas of policy and practice, as necessary.
- This policy will be reviewed on a yearly basis.

APPENDIX – FRENCH LAW

1 SUR LA DISCRIMINATION

Article 225-2 du Code Pénal

La discrimination définie aux articles 225-1 à 225-1-2, commise à l'égard d'une personne physique ou morale, est punie de trois ans d'emprisonnement et de 45 000 euros d'amende lorsqu'elle consiste :

- 1° A refuser la fourniture d'un bien ou d'un service ;
- 2° A entraver l'exercice normal d'une activité économique quelconque ;
- 3° A refuser d'embaucher, à sanctionner ou à licencier une personne ;
- 4° A subordonner la fourniture d'un bien ou d'un service à une condition fondée sur l'un des éléments visés à l'article 225-1 ou prévue à aux articles 225-1-1 ou 225-1-2 ;
- 5° A subordonner une offre d'emploi, une demande de stage ou une période de formation en entreprise à une condition fondée sur l'un des éléments visés à l'article 225-1 ou prévue aux articles 225-1-1 ou 225-1-2 ;
- 6° A refuser d'accepter une personne à l'un des stages visés par le 2° de l'article L. 412-8 du code de la sécurité sociale.

Lorsque le refus discriminatoire prévu au 1° est commis dans un lieu accueillant du public ou aux fins d'en interdire l'accès, les peines sont portées à cinq ans d'emprisonnement et à 75 000 euros d'amende.

2 SUR LE HARCÈLEMENT (*D'après l'article 222-33-2-2 du code pénal*)

Si l'auteur est âgé de plus de 18 ans, il risque pour harcèlement :

- 1 an de prison et 15 000 € d'amende.
- 30 000 € d'amende et 2 ans de prison s'il y a une circonstance aggravante,
- 45 000 € et 3 de prison s'il y a deux circonstances aggravantes ou plus.

En cas de violences volontaires, physiques ou morales, l'auteur majeur encourt 5 ans de prison et 75 000 € d'amende si la victime a plus de 15 ans.

Si celle-ci a moins de 15 ans, la peine s'élève à 7 ans d'emprisonnement et 100 000 € d'amende.

S'il y a eu provocation au suicide (suivi d'un suicide, ou d'une tentative) l'auteur encourt une amende de 45 000 € et 3 ans de prison si la victime a plus de 15 ans. Si celle-ci est âgée de moins de 15 ans, la peine est de 5 ans de prison et 75 000 € d'amende.

Si l'auteur est âgé de moins de 18 ans :

Si l'auteur est mineur, il encourt 6 mois de prison et 7 500 € d'amende pour harcèlement. 6 mois de prison supplémentaires s'ajoutent lorsqu'il y a une circonstance aggravante. S'il y en a 2 ou plus, l'auteur risque jusqu'à 18 mois d'emprisonnement.

Pour violence volontaire sur une victime de plus de 15 ans, l'auteur risque 1 an et demi de prison et si elle en a moins, la peine s'élève à 2 ans et demi.

Un enfant de moins de 13 ans ne peut pas aller en prison. Cependant, il peut être jugé coupable devant un tribunal pour enfants. Dans ce cas, plusieurs autres sanctions existent, en fonction de la personnalité de l'enfant, et si le juge décrète qu'il avait pleinement conscience de ses actes. Les sanctions vont d'un rappel à la loi du juge, à un placement dans un centre médical ou d'éducation, en passant par des mesures de liberté surveillée, de travaux scolaires, d'interdiction à l'accès et à la fréquentation de certains lieux et individus, ou encore un stage de formation civique, ou la confiscation de certains objets.

Dans le cas où la victime ou les parents de la victime réclament des dommages et intérêts, c'est les parents de l'auteur qui seront responsables de l'indemnisation. Si les parents les réclament à un membre du personnel éducatif, c'est l'État qui est responsable de l'indemnisation.