

# Child Sexual Abuse Prevention Toolkit

**In the US, 1 in 10 children will be sexually abused by the time they turn 18. You can help stop this. Child sexual abuse is one of the most prevalent risks that our children face. And we know from past cases that predators target youth-serving organizations as a means to gain access to potential victims. That's why, as a youth serving organization, one of the first steps to fulfilling your mission is to structure your programs and policies to limit the risk that this could happen to a child in your care.**

## **Strong Protocols Deter and Disrupt Predators**

This policy guide is based on national best practices, which can disrupt the grooming process that abusers use to gain access to children, and can limit opportunities for inappropriate behavior and abuse to occur between an adult and child, or between children. Strong policies make your program safer and may deter potential applicants who are looking for easier opportunities to have access to children. Even though some of the solutions we present may be challenging to implement at first, taking these steps can protect a child you serve.

## **Best Practice Policies**

In this document, you will find recommended policy language ready to be customized, in addition to background information and sample tools and documents that you can use. The information has been compiled from resources developed by The Redwoods Group, a nationwide insurer and risk consultant for youth-serving organizations, local youth-serving nonprofits and the CDC.

You are free to use and adapt any and all of the language you find here, as it applies to your program.

## **Every Organization is Unique**

We also understand that every organization and program is different. So, as you work through these recommended policies, please keep in mind that these best practices are designed not to interfere with your

## Balancing Caution and Caring<sup>i</sup>

“The same dynamics that create a nurturing environment, and may ultimately protect against child sexual abuse, can also open the doors to sexually abusive behaviors. Research has shown that youth who are emotionally insecure, needy, and unsupported may be more vulnerable to the attentions of offenders.<sup>ii</sup> By promoting close and caring relationships between youth and adults, organizations can help youth feel supported and loved and thus reduce their risk of child sexual abuse. But that same closeness between a youth and an adult can also provide the opportunity for abuse to occur. When developing policies for child sexual abuse prevention, organizations must balance the need to keep youth safe with the need to nurture and care for them.”

- *Centers for Disease Control and Prevention (CDC)*

mission, but to enhance and protect it. If these policies do not apply to your program, or wouldn't fit with the important work you do, we hope you will take their spirit and find creative ways to protect children from that risk.

Lastly, please remember that these policies only have their intended impact if they are being practiced in a given moment by your organization. Once implemented, all staff members will need to be trained on and held accountable to these guidelines. Any gap between your policies and the way your staff is practicing them can leave children at greater risk.

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# [Youth Serving Organization Name] Child Abuse Prevention Plan

The [INSERT YSO NAME] takes the prevention of child abuse very seriously. We understand that child abuse and inappropriate contact of children is a pervasive problem throughout the United States that must be managed in a proactive manner if we are to protect those in our care. Our leadership and Board of Directors have enacted the following plan to manage our programs and minimize the potential for an abuse incident to occur. If an allegation does occur we will proactively work with the authorities and the family to respond in a prompt and empathetic manner.

The [YSO NAME] believes the following policies are vital to the protection of children in our programs. Therefore they will be shared with and applied to all staff, including volunteers.

## 1.0 Hiring Practices and Screening

### Overview: Deterrence and Detection

Screening through your hiring process is the first line of defense in protecting the kids you serve from adults who wish to do them harm. A strong screening process can weed out individuals who raise concerns, and turn away potential applicants who realize they cannot make it through your process without having to reveal a past history of abuse or warning signs. Your guidelines should apply to all staff, as well as any volunteers and contractors who work directly with kids.

### Suggested Policies

- 1.1 Mandatory, comprehensive applications** – All prospective staff members will complete an application to work or volunteer that includes questions in the following areas: criminal conviction, past work history, education. The application will include a statement that [YSO NAME] has a zero tolerance standard for abuse and inappropriate behavior by staff members (Appendix 1). All applications will be signed by the individual and maintained in their personnel file.
- 1.2 Consistent interviews** – Prospective staff members will be interviewed by at least two separate staff members. All interviews will be documented on an approved interview form that ensures consistency of questions asked (Appendix 2). During all interviews the prospective staff member will be asked to read the statement on abuse prevention (Appendix 1) and verify that they are in agreement with its purpose and that they will abide by its standards if hired.
- 1.3 Social Security address checks** – This involves performing a social security address trace to identify all of the applicant's past addresses, in order to verify the accuracy of the information provided in the application and identify jurisdictions that should be checked for criminal history. A Social Security trace is a list from the Social Security Administration of all addresses at which the individual has received a paycheck – it is not simply a verification of the Social Security number through various credit sources as is provided by many vendors.
- 1.4 Criminal record checks for all staff** – [YSO NAME] will conduct a search for criminal activity by any prospective staff member. This search may be through law enforcement agencies or through entities that provide such service and may include examining local, county, and state records throughout the entire country and searching various

registered sex offender lists. Applicants who are returning staff will receive a new check if they have been away from [YSO NAME] for more than 90 days.

[YSO NAME] is strongly committed to protecting its members and the children in their care from all harm. However, a conviction does not automatically generate a rejection of the application – all cases are individually evaluated.

- 1.5 **Three separate reference checks, including family** – [YSO NAME] will contact at least three references for all prospective staff. At least one reference must be a *close family member* to the applicant. The reference's responses will be documented on an approved form that specifies questions for uniformity of evaluation (Appendix 7). Past employers will be asked if the person is eligible for rehire. Written references will be accepted only with verbal verification by the [YSO NAME]. If the written reference did not address the questions normally asked, those questions will be asked during the telephone contact. All reference forms must include the date and the printed name and signature of the staff member who completed it.
- 1.6 **Keep documentation on file** – All applications, reference checks, criminal record checks and interview notes will be kept in the individual's personnel file that is maintained in the [Human Resources department or Executive Director's office]. If the original must be housed at an off-site location because of licensing requirements, a full duplicate copy will be maintained at the [corporate/main] office.
- 1.7 **Treat volunteers and contractors as staff** – Volunteers and contractors who interact with children are treated as staff members, with the same expectations for behavior around children outlined in this document, even if they receive no remuneration. The procedures for their utilization are the same as for a paid staff member and points 1.1 through 1.6 above and 2.1 and 2.2 below must be followed. References will be checked and documented, with the number of references dictated by the volunteer's position. The application may be different and the reference questions vary from those asked of paid employees. Records (or copies thereof) should be kept in the [corporate/main] office.

## 2.0 Training and Education

### Overview: Creating a culture of safety

All of your staff, along with any volunteers who work with children, need to be made aware of the extent of the risk for child sexual abuse, and the policies and expectations you have in place to prevent it. Training staff before they start work, or shortly thereafter, can set clear standards for behavior around and with children, and make it clear to them how important it is that they adhere to those rules, and take action to ensure all other staff and volunteers do as well.

### Suggested Policies

- 2.1 **Signed Code of Conduct** – Staff members will sign and date a copy of the [YSO NAME] Code of Conduct (Appendix 3) prior to performing any work duties and annually thereafter. The Code of Conduct will be maintained in the personnel file. All new staff will have the Code of Conduct reviewed with them at the time of signing; the

signature line should state “I have read and understand the above as explained to me; I agree to abide by all of its conditions.”

All departments will review the Code of Conduct [insert frequency] each year and will have all staff reconfirm that they understand their expectations as staff members and agree to abide by those expectations.

- 2.2 Mandatory child abuse prevention training** – All staff members will participate in child abuse prevention training that includes training on sexual abuse [choose the appropriate criterion – before performing any job function, before working with children in any capacity, within 30 days of hire, etc.] Any staff member who does not complete the training as required will be [suspended or terminated]. All staff members [or all staff members working directly with children] will undergo a review of the training on an annual basis.
- 2.3 Comprehensive electronic communication policy** – [YSO NAME] has adopted the electronic communication policy attached (Appendix 4). The policy will be reviewed with all staff before their regular duties begin and annually thereafter. The purpose of this policy is to eliminate the potential for outside contact with youthful program participants via electronic means. [YSO NAME] understands that certain communication is needed as part of program operation; the policy addresses how and when it can occur.
- 2.4 Annual follow-up training** – [YSO NAME] requires that all staff working with children participate in an annual review of the abuse prevention training. [YSO NAME] may perform additional training with staff on identification and prevention of child abuse throughout the year.

## 3.0 Staff Expectations

### Overview: Eliminating gray areas

Most of the time we won't catch an abuser abusing a child, but we may have the opportunity to catch them breaking rules. These standards for staff behavior are designed to interrupt the grooming process that predators use to build a relationship with a child that can lead to sexual abuse. One of your organization's strongest protective steps is to set clear guidelines and hold staff and volunteers accountable to them, as they will make it much more challenging for a predator to create the kinds of situations and relationships that have been shown to make it possible for them to molest a child.

### Suggested Policies

- 3.1 Reporting of all suspicious behavior and/or violations of the Code of Conduct** – [YSO NAME] staff members are mandated to report any suspicion of child abuse to the jurisdiction having authority, regardless of whether the suspicion comes from one of our programs or elsewhere in the child's life. Reporting information will be shared with all staff and made available in each facility (Appendix 8). [YSO NAME] staff will report to their supervisor any indication of or warning signs concerning abuse involving a child and any instances of staff or volunteers violating the Code of Conduct. [YSO NAME] staff members who identify suspicious behavior or a violation of policy by a

fellow staff person should report the event to their supervisor, the executive director or a board member immediately.

- 3.2 No alone time with children** – At no time should [YSO NAME] staff be in a situation where they are alone with a child or children and cannot be observed by others. The [YSO NAME] will make every attempt to design and structure its programs to eliminate the potential for a staff member to be in a one-to-one situation. [YSO NAME] staff members are not to have children enter closets or other enclosed storage areas to retrieve equipment.

**Note for organizations that operate mentoring or other one-on-one programs:**

While preventing alone time between staff and children is an effective way of limiting opportunities for grooming and sexual abuse to occur, organizations that operate mentoring programs can address this risk by adding in other layers of protection, such as: requiring all mentoring meetings to be in public spaces, completing unscheduled drop in visits to one-on-one activities, extra communication with youth and staff/volunteers to verify the appropriateness of activities, additional screening and parent education, and other steps to verify that the one-on-one activities are not placing the children at risk.

- 3.3 No inappropriate hugging or touching of children** – Appropriate physical contact is important in the emotional development of all children and children at different developmental levels will need differing degrees of physical contact. Therefore, [YSO NAME] staff members should not perform frontal hugs of children – hugs should be from the side. The staff member should get down to the child's physical level when possible. [YSO NAME] staff should not touch children in any body location that would be covered by a bathing suit. Staff members should not pick-up school-aged children (to reduce potential for both abuse allegations and physical injury) and should not allow children to sit on their laps.
- 3.4** The [YSO NAME] childcare and preschool programs have adopted specific guidance regarding physical contact for staff members. Please refer to the childcare staff manual for details of the plan.
- 3.5 No babysitting or outside contact** – [YSO NAME] staff shall not provide care (babysit) or instruction or develop/maintain relationships with any children or families they meet through [YSO NAME] programs. If the staff member has a pre-existing relationship, e.g., for babysitting, the [branch executive/executive director/other] must be notified of the relationship and the relationship may continue. The family will be required to sign a form acknowledging the family's pre-existing relationship with the staff member and relieving the [YSO NAME] of any responsibility for the actions of the staff member with regard to that relationship. [YSO NAME] staff may not have contact, beyond incidental, with children they meet in [YSO NAME] programs outside of [YSO NAME's facility/YSO NAME's programs]. This includes but is not limited to:
- extra practices, coaching, or tutoring
  - transportation in a non-[YSO NAME] vehicle
  - private special events such as movies, sporting events, or any other similar excursions
  - visits to any residence
- 3.6 Diapering in view of others** – When diapering a child, staff will have another staff member in the room and be in a visible area of the room. When assisting a young child

with bathroom duties, staff members will not close doors to the bathroom or stall so they can be observed.

- 3.7 Supervision at all times** – All children who are registered into programs will be supervised by [YSO NAME] staff at all times. This includes bathrooms, locker rooms and changing areas. At no time should one staff member have direct care of a single child. If a staff member becomes alone with a child, s/he should promptly move to a location where s/he can be observed by other [YSO NAME] staff members.
- 3.8 [Use if necessary -] Special standards** – The [YSO PROGRAM NAME] varies from this policy because of a unique program design and has incorporated special standards for supervision that are detailed in their staff manual.

## 4.0 Program Operation

### Overview: Building layers of protection

The way you structure your program can increase or decrease the likelihood that something can happen to a child. Taking reasonable steps to ensure all children are supervised at all times, and surrounded by other appropriate layers of protection, can help you fulfill your mission while limiting the risk to the kids you serve, from both adult-to-child and peer-to-peer sexual abuse.

Peer-to-peer sexual abuse can often start as bullying and progress into sexual abuse if it is allowed to continue unchecked. Staff and volunteers should be trained to interrupt bullying and sexualized behavior or language immediately, and document all behavioral issues and violations in a central log. This can help identify any trends in behavior that will need to be addressed, even if the same adult is not there to witness all of them.

### Risk of abusive interactions between youth<sup>iii</sup>

Your organization needs to address interactions among youth in addition to monitoring interactions between employees/volunteers and youth. Many strategies that focus on the interactions between employees/volunteers and youth can be tailored to address interactions among youth.

Address all situations where unsupervised youth can sexually or physically abuse other youth. For example, if your organization has a policy that prevents adults from being present in locker rooms because of the risk of child sexual abuse, this may result in a situation where unsupervised youth can sexually or physically abuse other youth. A potential solution is adopting a policy that requires more than one adult to be present at all times.

Develop policies to deal with bullying and sexual abuse so that positive interactions can be promoted while acknowledging that some interactions are inappropriate or harmful.

### Suggested Policies

- 4.1 Effective supervision of bathroom breaks** – Children who are participating in [YSO NAME] programs are not to be sent to bathrooms without a [YSO NAME] staff member present. *The buddy system or three children together are not acceptable practices and are not permitted at the [YSO NAME].* For single stall bathrooms the [YSO NAME] staff will be positioned outside of the bathroom to make sure no one else enters the

restroom. At minimum, when multiple children are in the bathroom or locker room, [YSO NAME] staff members will be standing in the doorway so they can have at least auditory supervision of the children. Staff members can and are encouraged to be inside the facilities so they can be easily seen by the children and so they are able to immediately stop any inappropriate activity. This is best done with multiple staff members so individual staff members are not subjected to unwarranted allegations. Protocols that address the variety of unusual circumstances possible during outdoor or off-site activities shall be established and made part of that program/activity's operating guidelines (Appendix 9).

- 4.2 Maintain minimum ratios** – [YSO NAME] has enacted the following age group ratios for programs: [insert program ratios]. The [YSO NAME] has established these ratios as minimums, not goals to achieve. Certain programs and activities require more stringent ratios, e.g. [insert known programs or activities present in your programming]. Ratios alone do not equate to effective supervision, but if established ratios cannot be maintained the activity will be changed or additional staff members added.
- 4.3 Announced and unannounced program audits** – Announced and unannounced audits will be conducted of all [YSO NAME] programs. These audits will look directly at abuse prevention practices. The audits will be performed by leadership with all programs audited by leadership at least twice yearly.
- 4.4 Regular computer audits** – The Employee Handbook should clearly outline the access that the [YSO NAME] staff will have to all messages, email, internet usage and the like. It should also clearly specify those internet sites that are unacceptable and let the employee know that they will be terminated if they are visiting those or similar sites. [YSO NAME] should have systems in place to monitor and record all Internet usage and should audit this regularly to assure compliance with the standards.
- 4.5 Maintain supervision during transportation** – [YSO NAME] ratios and supervision standards apply during transportation. Staff will spread themselves out in the vehicle and maintain their focus on the children while transportation is occurring. If the children being transported are of multiple age groups, they should be seated by age group, with older children positioned to the rear of the vehicle. Boys and girls generally should not be seated together. Children with known relational challenges should also not be placed together. If larger capacity buses are used, staff should monitor behavior by walking through the aisle on a frequent but irregular basis.
- 4.6 Field trips** – The risks to children change when they are off-site. In order to protect them from predators who may be at fieldtrip locations the following standards will be enacted:
  - 4.6.1** The ratio of students to staff will be reduced when programs go off-site. The appropriate ratio will be determined based on age of the children and the field trip activity and location.
  - 4.6.2** Staff will check all bathrooms immediately prior to use by the children and will be in the restroom (if not single stall) when being used by a child.
  - 4.6.3** Children's changing of clothes should take place prior to leaving the [YSO NAME] facility and if possible should wait until the group has returned to the facility to minimize the use of changing facilities in public locations.

**4.6.4** Picking up of children while on field trips should only be allowed if prearranged and recipient should be required to show proof of ID and sign the child out as they would from the [YSO NAME] facility.

**4.7 Protect special needs participants** – Special needs program participants are, indeed, more at risk than others and need to be more closely supervised to prevent peer-to-peer abuse and the staff supervising them needs to be more closely supervised to prevent a predator from taking advantage of their impairment to abuse them.

Special needs volunteers or staff also need better supervision. While the staff member or volunteer may well appear to be an adult, their psychological state may have been arrested at a younger age. If so, they will need to be supervised by other staff accordingly.

**4.8 Enforce adult expectations around children** – [Members/congregants/etc.] are expected to use decent language and act in a positive manner. [Members/congregants/etc.] who talk in a sexual manner, perform sexual gestures, sexual acts, or attempt inappropriate contact with a child will have their membership suspended or terminated depending on the degree of the offense. The police may be contacted, if warranted. No use of cameras or cell phones is allowed in bathroom or changing areas. NOTE: [Member/congregant/etc.] records can be run automatically against child abuse and sex offender registries for each state, if your organization's software vendor has such capability.

**4.9 Special program expectations** – The following [YSO NAME] programs are recognized as needing specialized controls to reduce potential for abuse. While some of the already-recommended rules may not apply (you can't ban one-on-one contact in a mentoring program, for example), other rules (like feedback systems) need to be increased in intensity or frequency to balance the threats in these programs.

- Mentors Club
- Leaders Club
- Etc. ...

**4.10 Document behavioral challenges** – Bullying and any sexualized behavior and language violate [YSO NAME]'s mission and should be addressed and interrupted immediately. Following any behavioral issue, violation or bullying incident, staff should document what occurred in the participant behavior log, which will be reviewed [frequency] by [staff member] to identify and address any trends in inappropriate or bullying behavior.

## 5.0 Parental Education

### Overview: Expanding your network of allies

Parents can be your best allies in ensuring that your programs operate according to your policies and that no one is breaking rules. They are aware of the risk for their kids, and will almost always be grateful that your organization shares this information with them. In the large majority of cases, they see it as a sign that your organization is going above and beyond to create a safe environment. Communicating your practices to the parents in your program can help reveal when a rule is being broken or something inappropriate is happening, helping to get more people involved in making your programs as well-protected as possible.

### Suggested Policies

- 5.1 **Share [YSO NAME] child protection policy** – At the start of every program the [YSO NAME] will provide its child protection policy to parents (Appendix 5). The child protection policy provides parents with [YSO NAME] policies and information on child abuse. Both male and female staff contact information will be on the document in case a parent has questions, concerns, or observes a violation.
- 5.2 **Make reporting violations of policies easy** – [YSO NAME] will provide both male and female staff contacts that parents can call in case of concern. Staff will receive training on responding to an allegation, child abuse warning signs, and [YSO NAME] policies so they can effectively respond to concerns and questions. Staff will provide parents with important questions to ask children on a regular basis in order to detect abuse concerns, e.g.:
  - Is anyone scaring or threatening you?
  - Is anyone asking you to keep secrets?
  - Has anyone said anything to you that made you feel bad?
  - Is anyone touching you in a way that you don't like?
- 5.3 **Educate children** – Children participating in camps, after school programs, teen programs, and [insert other programs] will be informed of the policies staff have agreed to follow regarding physical contact, gift giving and outside contact.

## 6.0 Responding to an Allegation

### Overview: How to respond, heal and learn

Although we hope you will never find yourself in this situation, it is important to prepare your staff and organization to respond appropriately in the event there is an allegation. Taking appropriate steps can help protect a child, and help them start the healing process as early as possible, while still allowing the authorities to investigate the matter as appropriate.

## Suggested Policies

- 6.1 Report suspicious behavior to a supervisor** – All staff members have received specific training concerning the requirement to immediately report violations of [YSO NAME] policies to their supervisor. If the supervisor does not effectively respond, the staff members have been trained to notify the next level supervisor. [YSO NAME] staff members are expected to observe other staff members' behaviors, including that of supervisors, and to report any suspicions to a supervisor.
- 6.2 Legally mandated reporters** – All [YSO NAME] staff members are mandated reporters regarding child abuse. Any evidence of potential child abuse or observation of inappropriate contact by a parent, staff member or other adult or child will be reported to [Insert State Agency and Contact Information] (Appendix 8).
- 6.3 Suspend staff or youthful offenders immediately** – Any [YSO NAME] staff member who is alleged to have abused a child will be suspended with pay pending the outcome of an investigation by [YSO NAME] and appropriate authorities. If the allegation is substantiated, the staff member will be terminated. If the allegation is against a program participant, s/he will be suspended pending the outcome of the investigation. Depending on the severity of the incident the participant maybe terminated from the program.
- 6.4 Investigate all allegations** – [YSO NAME] will perform an investigation following any allegation of child abuse by a staff member, participant or member. The [YSO NAME] may utilize its insurance company or other agencies to interview staff, witnesses and/or children.
- 6.5 Secure personnel files** – Following an allegation against a staff member, their personnel file will be sealed and locked in [insert secure location]. The file will have no items removed or added. It will only be moved from the locked location at the direction of the [CEO/Executive Director].
- 6.6 Work with the media** – [YSO NAME] has enacted the media plan outlined in Appendix 6. When the plan is enacted, only the individuals identified in the plan should speak with members of the media. The [YSO NAME] will develop a media statement.
- 6.7 Provide counseling** – After an event [YSO NAME] will engage the firm [insert local provider name] to provide consulting services to staff and affected children. This firm or a psychologist of the victim's family's choice will be provided as well. [YSO NAME], in consultation with its insurer, may offer to cover the expense of counseling in an effort to start the healing process for the victim.

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## Appendix 1

### STATEMENT ON SEXUAL ABUSE PREVENTION *(Share this with the candidate)*

[YSO NAME] has a policy that we explain to each of our candidates. [YSO NAME] is aware that there may be people who want to work or volunteer here for the wrong reasons. For these reasons, we are committed to the following non-negotiable policies:

- **Comprehensive background checks:** To prevent access to the kids we serve by dangerous individuals we check every applicant's criminal history and speak with individuals about their character as well as job skills.
- **No alone time:** We structure our programs so that no staff member or volunteer is left alone with a child or other vulnerable individual.
- **Proactive investigation:** We try to prevent any opportunity for sexual abuse and we periodically interview children and others about their experiences in the program.
- **All allegations are investigated:** We take all allegations, including those from children, very seriously. We refer all allegations to the authorities for investigation, and we cooperate fully with any investigation.

Wrongdoers need to know that this is a very risky place to attempt to abuse children or the vulnerable. This thorough process not only protects the people in our care, but it also minimizes the potential for false abuse allegations against innocent staff members and volunteers.

Do you have any questions about our policy?

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## Appendix 2

### SAMPLE INTERVIEW AND APPLICATION QUESTIONS<sup>IV</sup>

The following questions may be used in a written application or personal interview. A single answer should not determine whether an applicant is selected or rejected. Along with other forms of information, answers to these questions can help you build a more complete picture of an applicant.

- **What type of supervisory situation do you prefer?** If applicants are very independent, they may not fit in an organization whose policies and procedures require close supervision.
- **What age/sex of youth do you want to work with? How would you feel about working with a different age/sex?** If an applicant seems fixated on one age/sex, be wary. However, it may be that the applicant has experience or is gifted with working with certain age groups. Asking follow-up questions about why an applicant has a strong preference can help you determine if there is cause for concern.
- **Is there anyone who might suggest that you should not work with youth? Why or why not?**
- **Why do you want the job?**
- **What would you do in a particular situation?** Set up scenarios that involve potential concerns, boundary issues, or youth protection policies and interactions to gauge the applicant's response. Be concerned if applicants disregard the organization's policies and procedures or handle a situation poorly.
- **What makes you a good candidate for working with youth?** What would your friends or colleagues say about how you interact with youth?
- **What other hobbies or activities do you enjoy?** Determine if applicants have mature, adult relationships – not just relationships with youth.

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## Appendix 3

### STAFF CODE OF CONDUCT

1. In order to protect [YSO NAME] staff, volunteers, and program participants, at no time during a [YSO NAME] program may a staff person be alone with a single child where they cannot be observed by others. As staff supervise children, they should space themselves in a way that other staff can see them.
2. Staff shall never leave a child unsupervised.
3. Restroom supervision. Staff will ensure:
  - The restroom is not occupied by suspicious or unknown individuals before allowing children to use the facilities.
  - Children are with an adult staff member and proceed in groups of three or more (e.g. one staff member and two children or two staff members and one child) when using the restroom.
  - Either 'line of sight' or 'line of sound' supervision is maintained while children are using the facilities.
  - No child, regardless of age, enters a bathroom alone on a field trip.
  - If staff members are assisting younger children, doors to the facility must remain open.
4. Staff should conduct or supervise private activities in pairs – diapering, putting on bathing suits, taking showers, etc. When this is not feasible, staff should be positioned so that they are visible to others.
5. Staff shall not abuse children, including:
  - Physical Abuse – strike, spank, shake, slap
  - Verbal Abuse – humiliate, degrade, threaten
  - Sexual Abuse – inappropriate touch or verbal exchange
  - Mental Abuse – shaming, withholding love, cruelty
  - Neglect – withholding food, water, basic care, etc.
  - Any type of abuse will not be tolerated and may be cause for immediate dismissal.
6. Staff must use positive techniques of guidance, including redirection, positive reinforcement and encouragement rather than competition, comparison and criticism. Staff will have age appropriate expectations and set up guidelines and environments that minimize the need for discipline. Physical restraint is used only in pre-determined situations (necessary to protect the child or other children from harm), is only administered in a prescribed manner and must be documented in writing.
7. Staff will observe each child's health each day as they enter the program, noting any fever, bumps, bruises, burns, etc. Questions or comments will be addressed to the parent or child in a non-threatening way. Any questionable marks or responses will be documented.
8. Staff responds to children with respect and consideration and treats all children equally regardless of sex, race, religion, culture.

9. Staff will respect children's rights to not be touched in ways that make them feel uncomfortable, and their right to say no. Other than diapering, children are not to be touched in areas of their bodies that would be covered by a bathing suit.
10. Staff will refrain from intimate displays of affection towards others in the presence of children, parents and staff.
11. While [YSO NAME] does not discriminate against an individual's lifestyle, it does require that in the performance of their job they will abide by the standards of conduct set forth by the [YSO NAME].
12. Staff must appear clean, neat, and appropriately attired.
13. Using, possessing, or being under the influence of alcohol or illegal drugs during working hours is prohibited.
14. Smoking or use of tobacco in the presence of children or parents during working hours is prohibited.
15. Profanity, inappropriate jokes, sharing intimate details of one's personal life, and any kind of harassment in the presence of children or parents is prohibited.
16. Staff must be free of physical or psychological conditions that might adversely affect children's physical or mental health. If in doubt, an expert should be consulted.
17. Staff will portray a positive role model for youth by maintaining an attitude of respect, loyalty, patience, courtesy, tact, and maturity.
18. Staff may not be alone with children they meet in [YSO NAME] programs outside of [YSO NAME]. This includes babysitting, sleepovers, and inviting children to your home. Any exceptions require a written explanation before the fact and are subject to administrator approval.
19. Staff members are not to transport children in their own vehicles.
20. Staff may not date program participants under the age of 18 years of age.
21. Under no circumstance should staff release children to anyone other than the authorized parent, guardian, or other adult authorized by the parent or guardian (written parent authorization on file with [YSO NAME]).
22. Staff members are required to read and sign all policies related to identifying, documenting, and reporting child abuse and attend trainings on the subject, as instructed by a supervisor.

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## Appendix 4

### ELECTRONIC COMMUNICATION POLICY

A major component of the abuse prevention code of conduct used by many youth serving organizations is that no communication is allowed outside of program activities. Current technology has made monitoring and enforcement of that standard extremely challenging, yet it must be done to protect both your staff and the children in your programs. Well-defined screening and hiring protocols combined with detailed staff training and thorough parental education and feedback practices will work together to meet the goal of protecting your children.

Implementing an Electronic Communication Policy is an important means of keeping children safe. Designed to guide and protect both your staff and the youth they serve, it should be shared with parents and participants so that all expectations and controls are fully understood.

Your policy should include at least the following:

- **Phone Calls / Text Messages** – Staff members are prohibited from initiating or receiving personal phone calls or text messages with youth who are in or whom they have met through [YSO NAME] programming. A call or text is considered personal if it does not involve both a [YSO NAME] device and [YSO NAME]-specific subject matter. Staff members are required to report incoming calls or texts to their supervisor immediately.
- **Email / Instant Messaging** – Staff may not share any personal email address or instant message name or nickname with youth. Staff may neither initiate nor respond to email or instant message communication from youth while using any personal (i.e., non-[YSO NAME]) account or connection to the internet.
- **Social networking websites** – Any communication with youth using this medium (e.g., Facebook, Twitter, etc.) must use [YSO NAME] sponsored or approved sites – no personal blog or social networking website may be used. Also,
  - Any staff profile or blog must be private and inaccessible to youth; the site should not have pictures of or make references to specific youth.
  - Staff with profiles on social networking sites may neither request to be friends with nor accept as a friend a youth as described in the policy.
- **Appropriate protocols** - All communication with youth must be from [YSO NAME] accounts and devices. Communication from youth must be forwarded to supervisory staff and the youth's parents or guardians must be notified. All other communication with youth must be documented immediately with the staff member's supervisor.

Teen programming requires communicating with teens and being effective necessitates use of their preferred methods. Require your teen staff to use only [YSO NAME] devices and accounts for such communication and regularly monitor the contact records to identify excessive communication with any particular participant. If this type of behavior is identified, determine the appropriateness of the contact. Such communication may have been suitable but excessive contact with a particular child is a pattern common to abusers that must be investigated.

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## Appendix 5

### PARENTAL FEEDBACK INFORMATION

The safety of children in our programs is of utmost importance to [YSO NAME]. We design our programs, policies and practices to ensure that children are safe and have positive experiences while in our care, as we place great value on providing a child-safe and child-centered atmosphere where children grow, learn and thrive safely. We all have important roles to play in ensuring bright futures for the children in our lives and we invite you to join us in our commitment to ensuring all children are safe in our community. Listed below are policies we require our staff and volunteers to adhere to, and steps you can take as a parent to help us keep our programs as safe as possible.

#### Our Policies:

- All children are supervised at all times.
- A child should never be alone with a staff member or volunteer where they can not be observed by others.
- Staff and volunteers should only contact children they meet in our programs about issues directly related to program activities.
- Staff and volunteers may not transport or arrange to meet children outside of our programs. This includes babysitting, extra coaching or mentoring, rides to and from our programs and any other non-program activities.
- Children should not receive special gifts or special attention beyond what all children receive from staff or volunteers.
- Bullying should be interrupted immediately and documented by staff.
- Staff or volunteers should never touch children inappropriately, including any touches in an area that would be covered by a bathing suit, tickling, hugs from the front or lap sitting.
- Children must be signed in and out of programs every day, according to our drop off and pick up procedures. Staff may only release children to persons who are authorized to pick them up.
- Our staff and volunteers are mandatory abuse reporters. If they have reasonable cause to believe that a child has suffered abuse, they are required by law to report it to the authorities.

If you ever have a concern, or learn of a violation one of these policies, please contact either:

[Insert Female Contact Info]

[Insert Male Contact Info]

Steps our organization takes to protect your children:

[Overview of screening practices]

[Overview of training practices]

[Overview of program and supervision-related policies]

[Overview of investigation and staff/volunteer discipline policies]

Steps you can take as a parent to help us provide the safest environment possible:<sup>v</sup>

**P – Pay attention** to changes in behavior, such as sleeping or eating patterns, fear of a person or place and discomfort with physical contact.

**R – Report concerns** about a staff or volunteer. You may contact [\[Insert male and female contact info\]](#).

**O – Observe** your child's programs by dropping in and asking questions.

**T – Talk to them** about their experiences in our programs, and other activities they are engaged in. Here are a few questions you can ask:

- Has anyone said anything that made you feel bad?
- Is anyone scaring or threatening you?
- Is anyone asking you to keep secrets?
- Is anyone touching you in a way you don't like?

**E – Educate yourself** – Learn more about protecting your child with [Darkness to Light's Stewards of Children Training](#).

**C – Control** your child's interactions with other adults to make sure they are not alone with them or receiving special attention or gifts.

**T – Trust your instincts** and tell us if anything seems strange or makes you uncomfortable.

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## Appendix 6

### MEDIA POLICY

#### Overview and Goal

To establish a centralized contact and communications system for dealing with unexpected events and to provide accurate, timely information for all media inquiries. When appropriate, these procedures will allow [YSO NAME] staff to focus on the needs of children and still be fully responsive to all media questions. [YSO NAME] reserves the right not to contact the media whenever it deems appropriate.

### CRISIS COMMUNICATION

#### Who speaks for [YSO NAME]?

The [President/Executive Director (P/ED)] is the official spokesperson for [YSO NAME]. When appropriate, all media inquiries shall be directed to [YSO NAME]'s [Staff Position], who will contact the [P/ED]. In the event the [P/ED] is unavailable, the official spokespeople for the organization in order are as follows:

1. [Staff Role and Name]
2. [Staff Role and Name]
3. ...

Depending on the severity of the situation, the [P/ED] may designate a spokesperson to be made available to the media for comment as needed until the crisis subsides. All other staff members will not answer any questions from the public or media and will refer to or notify the spokespeople above.

#### Who decides what information is released and who releases the information?

The [President/Executive Director (P/ED)] is the only person authorized to release information to the public or the media. The [P/ED] with the advice/input of [Staff Position(s)] will decide what information is released to the public and/or media. In the event [P/ED] is not available, the [Staff Position(s)] will assist the next spokesperson listed above to determine what will and will not be released. The [Staff Position(s)] will consult on the possible media questions to prepare the [P/ED] for media responses.

#### Examples for live media and suggestions for interviews:

**“These are the facts we have at this time. We are doing an internal investigation and will share the facts as soon as they become available. At this time, I must get back to our staff and children.”**

- Do not be defensive; do not speculate; be able to back up facts.
- Do not give erroneous information, and do not sensationalize.
- Do not give information that any affected family may not want public.

[Additional guidelines as needed]

## Appendix 7

### REFERENCE CHECK FORM

Candidate Name:

Name of Staff Person Making Call:

Hello, I am [Staff Person Name] with [YSO NAME]. [Candidate Name] has given us your name as a reference to verify his/her character and ability to work in [YSO NAME]. This call will be kept confidential and used only to determine [Candidate Name's] ability to work in the area that he/she has requested.

[Candidate Name] has applied to work in [Department] as a [Role]. He/she would be working with [age group/program type/etc.]. If you have time, I would like to ask you a few questions to help us determine their potential for success with this program.

	Reference 1	Reference 2	Reference 3 (Family)
Phone Number			
Reference's Name			
Date			
How long have you known [Name]?			
(Professional) In what capacity? (Family) How often have you been around [Name]?			
Have you observed him/her working with [age group/program type]?			
This position involves working directly with children. Do you see this as an appropriate position for [Name]?			
Is there any other info you'd like to share that will help us assess [Name's] capabilities?			
(Professional) Is he/she eligible for rehire?			

**Comments:**

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## Appendix 8

### BATHROOM SUPERVISION INFORMATION

Bathrooms are a place of privacy – so most of us have been taught from childhood. That privacy is good as it allows users a degree of modesty and it gives the rest of us separation from those personal activities, which our culture considers private. However, it also provides seclusion – a place where supervision may be less than desired. Incidents of inappropriate behavior are more common in bathrooms than other areas that are less private. Inadequate bathroom supervision allows children the opportunity to explore their curiosity or potentially be involved in other inappropriate acts, both of which constitute unacceptable behavior in your organization. Accessible unmonitored bathrooms can also allow predators unobserved access to children.

Whether the abuser is an adult or child, the necessary factors for inappropriate behavior normally are contact, seclusion, and influence. Most of these incidents involve a lack of supervision, which allows the seclusion necessary for peer-to-peer abuse or for an adult perpetrator to gain access to a child. It is crucial that we remove all opportunities for seclusion to eliminate one of the components from the formula for abuse.

#### **Establish Specific Bathroom Policies.**

The information below outline actions that can be taken to reduce the potential for bathroom abuse. Each site is unique and specific bathroom policies will vary, possibly even within an individual facility. However, the following things should be consistent without regard to location:

- The first rule in child-serving activities, all children are supervised all of the time, is especially critical during bathroom times.
- All bathroom policies and procedures should be:
  - Clearly and unambiguously stated.
  - Explicitly communicated and reinforced.
  - Consistently monitored and enforced.
  - Regularly reviewed to ensure that they still address the exposures and needs of the specific bathrooms and children to which and whom they apply; the review process should include staff critiques of the existing protocols and identification of any practical or ideological concerns.
- Preferred protocol should be to have an adult staff member directly supervise the children from the bathroom doorway; oversight can be maintained without infringing on the personal privacy provided by the individual stall or fixture.
  - Staff, not children, should chose the group going to the bathroom; relationships and interaction between the children should be carefully considered – don't set the stage for bullying or other peer-on-peer abuse.
  - The number of children allowed in the bathroom at one time should not exceed the number of stalls or fixtures.
- If necessary to ensure the children's privacy or safety, a staff member could send the children into an otherwise empty bathroom one at a time while supervising the rest of the children from outside the door.

- Carefully monitor behavior during group-use times in the restrooms, e.g., changing for swimming or any other similar activity.
  - Younger children’s curiosity and inquisitive nature may result in inappropriate staring and/or touching.
  - Older children’s behavior patterns and pressure from peers may result in inappropriate behavior.
  - There should be no commingling of adults and children when either is in a state of undress. Either:
    - Have separate spaces for adults and children
    - Restrict access to the common space when children are using it
- Eliminate protocols that allow a child or children to go to the bathroom without direct supervision – they violate the first rule of child-serving activities.
  - Historically, bathroom time is when most peer-to-peer abuse occurs – youthful predators are very opportunistic – don’t give them an opportunity.
  - The rule of three is not an acceptable protocol – the children are unsupervised.
  - Sending a responsible older child (including teen-aged volunteers) to oversee the group is not an acceptable protocol – supervision must be by an adult.

### **Manage the Environment**

Guaranteeing an absolutely safe space is impossible – there are too many variables, of which people are the most erratic and unpredictable. However, to the extent possible you should:

- Control building access:
  - Prevent unauthorized entry by minimizing and securing all the possible ways into the building.
  - Identify everyone who enters the building by requiring ID each time they enter.
  - Require vendors or meeting attendees to register at the front desk and get a vendor or visitor pass every time they enter the building and to wear it conspicuously.
  - Train all staff to welcome each individual who they do not know. This welcome should include politely determining the person’s purpose, verifying the authorization, and guiding him or her as needed (including, if appropriate, out of the building).
  - Keep doors locked to all areas that are not actively in use. Locking all service and inactive programming areas limits places for potential abuse to bathrooms and active programming areas, thus reducing exposure.
- Plan, build, or restructure space, whenever possible, so that:
  - Access to childcare areas is restricted.
  - Bathrooms and locker rooms have no locking mechanism on the hallway door unless the room is designed for individual or family use.
  - Bathroom and locker room doors, especially family locker rooms or unisex bathrooms, are situated so that access is controlled by a programmable lock or can be monitored by direct staff observation or security cameras.

- Bathrooms for childcare are located inside the respective childcare rooms.
- Bathrooms located inside childcare rooms have Dutch doors so that staff can monitor behavior without infringing on the children’s privacy and dignity.
- Access to bathrooms that are outside of childcare rooms can be limited to the children and supervising staff when children are using them.

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## References

<sup>i</sup> Saul J, Audage NC. *Preventing Child Sexual Abuse Within Youth-serving Organizations: Getting Started on Policies and Procedures*. Atlanta (GA): Centers for Disease Control and Prevention, National Center for Injury Prevention and Control; 2007.

<sup>ii</sup> Finkelhor D. Four preconditions: a model. In: Finkelhor D, editor. *Child sexual abuse: new theory and research*. New York (NY): The Free Press; 1984. p. 53–68.

<sup>iii</sup> Saul J, Audage NC. *Preventing Child Sexual Abuse Within Youth-serving Organizations: Getting Started on Policies and Procedures*. Atlanta (GA): Centers for Disease Control and Prevention, National Center for Injury Prevention and Control; 2007.

<sup>iv</sup> Saul J, Audage NC. *Preventing Child Sexual Abuse Within Youth-serving Organizations: Getting Started on Policies and Procedures*. Atlanta (GA): Centers for Disease Control and Prevention, National Center for Injury Prevention and Control; 2007.

<sup>v</sup> South Shore YMCA. "Safe Kids Brochure" and "Child Protection Steps." Accessed on January 27, 2016 at <http://ssymca.org/safe-kids/>.