

# Comparison of Safe-Guarding Policies Across National Youth Serving Organizations

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The child protection policies listed here represent information gathered from five national youth serving organizations. These policies may not necessarily reflect the realities of every program in every city as they are a representation of each organization's *stated* policies and may reflect suggestions from the national organization. It is also possible that there are omissions if an organization's policy is not publically available or if policies exist which are not able to be shared.

## Screening and selecting employees and volunteers

### Most organizations:

- ❖ Have policies in place for screening applicants and checking references. Include clearly written job descriptions, comprehensive written applications, and a statement of zero tolerance for abuse or inappropriate behavior by staff members.
- ❖ Require that all applications are signed and maintained in the personnel file along with statements about the organization's hiring practices and a statement of truthfulness.
- ❖ Conduct in-person interviews using at least two interviewers and approved documentation.
- ❖ Require at least three references be checked, at least one being a close family member, with approved documentation of responses.
- ❖ Provide prospective staff with a Code of Conduct or statement on abuse prevention and ask staff to verify that they are in agreement with its purpose and that they would abide by the standards if hired.
- ❖ Require background checks on all staff who are in contact with youth prior to start, and at least every 2 years after joining the organization. Background checks include Social Security traces, national criminal record searches, and national sex offender registry searches.

### Some organizations:

- ❖ Conduct telephone interviews to pre-screen candidates.
- ❖ Have a policy for conducting reference checks including listing specific behaviors or traits which could raise red flags and policies for accepting written references.
- ❖ For background checks: list specific crimes which automatically disqualify candidates, include states in which the applicant has lived over the past 10 years, and require new checks for staff returning after an absence of over 90 days.
- ❖ Conduct checks on non-program staff, board members, maintenance and janitorial contractors, as well as any other individuals who share facilities with the organization.
- ❖ Conduct credit, driving record, education verification and other checks as needed.
- ❖ Have a system in place to evaluate findings about criminal records or other concerns as well as a review panel to evaluate questionable findings about candidates.

**The Salvation Army's Territorial Registry includes applicants who have been screened out or have not been approved for work with minors. The screening process includes written clearance from higher levels to ensure candidates who are screened out of one unit are not employed in another.**

### Policies recommended by the CDC which are not in place at the YSOs surveyed:

- ❖ Conduct more rigorous screening for employees or volunteers with autonomy.
- ❖ Ask applicants directly if they have any problem with any of the policies and procedures.
- ❖ Conduct an internet or social media search for the candidate.

### Policies adopted by YSOs which were not included in the CDC's recommendations:

- ❖ All organizations consider volunteers to be staff members for screening and youth protection policy purposes.
- ❖ Some organizations conduct a performance review at the end of the introductory period.

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## Guidelines on interactions between individuals

### **Most organizations:**

- ❖ Have basic guidelines for appropriate touch.
- ❖ Prohibit staff from abusing children in any way and specifically prohibit sexual misconduct, physical discipline or injuries inflicted on youth.
- ❖ Require personnel to treat youth with respect and consideration and treat all individuals equitably, regardless of age, gender, race, religion, culture, or socio-economic status.
- ❖ Prohibit abusive, harsh, threatening, derogatory, indecent, inappropriate, or demeaning speech from any adult toward youth and prohibit staff from initiating or participating in sexually oriented conversations with minors.
- ❖ Prohibit staff from dating or becoming romantically or sexually involved with minors served in program and prohibit staff from giving money or to minors served in program.
- ❖ Prohibit staff from possessing, viewing or downloading sexually explicit materials on the organization's property or equipment.
- ❖ Will not release children to anyone other than the authorized parent, guardian, or other adult authorized by the parent or guardian (with written authorization on file) under any circumstances.
- ❖ Require programs to be adequately supervised with minimum staff to youth ratios during all activities, including transportation. Prohibit youth from being left alone by themselves or with a single staff member and include policies for mitigating risk should a child and staff member become alone.
- ❖ Prohibit staff contact with youth outside the program unless there is a pre-existing relationship. In these cases, the family is required to sign a form acknowledging the relationship and relieving the organization of any responsibility.
- ❖ Outline basic policies for bathroom usage.
- ❖ Prohibit hazing, bullying, or similar behavior among youth.

### **Some organizations:**

- ❖ Prohibit youth members from refusing to obey staff, acting irresponsibly or destructively, using inappropriate language, or making sexual contact or overtures.
- ❖ Maintain policies addressing responsibilities, appropriate behavior and consequences for misconduct.
- ❖ Prohibit personnel from ever being nude or inappropriately dressed around minors.
- ❖ Prohibit youth from sharing a bed, sleeping bag, small tent, or other accommodations with an adult or a person of the opposite sex, or more than two years apart, other than a family member or guardian.
- ❖ Maintain specific policies for appropriate touch with youth.
- ❖ Maintain specific policies and procedures for diapering and bathroom use and supervision.
- ❖ Outline appropriate and inappropriate methods of supervising and interacting with youth.
- ❖ Require youth to be signed into and out of programs each day.
- ❖ Refuse to recognize any secret organizations as part of its program. Maintain all aspects of the program open to observation.
- ❖ Have specific policies and procedures in place for transporting youth, overnight trips, hiking, swimming, or other unique situations. Prohibit staff from transporting youth in personal vehicles.
- ❖ Prohibit staff displays of affection toward others in the presence of youth, parents, and staff.

### **Policies recommended by the CDC which are not in place at any of the YSOs surveyed:**

- ❖ Include parents by obtaining permission for youth to participate in certain activities, keeping caregivers informed about what their children will be doing and where they will be going, and allowing caregivers to provide input on what activities they are comfortable with

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## **Policies adopted by YSOs which were not included in the CDC's recommendations:**

- ❖ Some organizations had policies in place for minors in leadership positions. These youth may only lead under the direct leadership and supervision of adults.
- ❖ Some organizations explicitly state that minors may not be used to meet supervision ratios.
- ❖ Some organizations call for additional supervision for program participants, volunteers, or staff with special needs
- ❖ Some organizations ask that all departments review the Code of Conduct annually and have all staff reconfirm that they understand their expectations.
- ❖ Some organizations prohibit leaders from forcing kids into buddies

**The JCC Association's "Culture of Safety" booklet offers programs a step-by-step guide to youth protection including sample youth protection policies for program leadership.**

## **Monitoring behavior**

### **Most organizations:**

There are no policies for monitoring behavior which are uniform across all organizations.

### **Some organizations:**

- ❖ Hold program leadership accountable for meeting supervision standards.
- ❖ Use a variety of monitoring methods including unannounced visits to the program.
- ❖ Expect staff to observe other staff members' behaviors, including that of supervisors, and to report any suspicions.
- ❖ Maintain access to all messages, email, internet usage and the like. This access is outlined in the employee handbook.
- ❖ Conduct performance reviews and acknowledge appropriate and inappropriate behaviors.
- ❖ Monitor adult members and guests who are not affiliated with the youth program.
- ❖ Provide organization-issued identification to all staff members and volunteers, preferably with photograph. To be visible whenever they are working with youth.
- ❖ Have policies in place for monitoring transportation, off-site programs and activities, high-risk activities (such as changing, showering, bathroom, transportation, and overnight stays) and personnel interactions and boundaries with minors.
- ❖ Maintain policies and procedures for approving new programs and one-time activities.

### **Policies recommended by the CDC which are not in place at any of the YSOs surveyed:**

- ❖ Increased supervision of youth leaders
- ❖ Define monitoring activities with documentation of monitoring
- ❖ Formal and informal supervision with positive reinforcement when good supervision happens

### **Policies adopted by YSOs which were not included in the CDC's recommendations:**

- ❖ Some programs conduct announced and unannounced audits at least twice yearly at all program locations. Audits are focus directly on abuse prevention practices.
- ❖ All units are responsible for policy enforcement.
- ❖ Participants and/or their parents should be polled at each program's end both to identify strengths and potential problems and to evaluate the relationship between expectations and experiences.
- ❖ Staff conduct a health check of every child, each day, as they enter the program, noting any fever, bumps, bruises, burns, etc. Any questionable marks or responses are documented and questions or comments addressed to the parent or child in a non-threatening way.

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## Ensuring safe environments

### **Most organizations:**

- ❖ Unused building areas are to be designated, known and enforced as off-limits to minors and unauthorized individuals.

### **Some organizations:**

- ❖ Maintain and secure control of entries, exits, and remote areas with one point of entry if possible. Front desk staff engage and identify all who enter and require members to present ID cards. Parents, guests, and contractors are escorted by staff or volunteers
- ❖ Maintain a clear staff and volunteer presence. Employees/Volunteers wear uniforms or other distinctive apparel. Some staff “float” to compensate for facilities that are difficult to supervise.
- ❖ Contractors or repeat guests are properly screened.
- ❖ Open doors, open blinds and windows are used to allow informal monitoring by passersby.
- ❖ Personnel only areas are off limits to minors and unauthorized individuals.
- ❖ Specific supervision plans address high risk areas such as restrooms, exterior areas and related hazards, and off-limits areas.

### **Policies recommended by the CDC which are not in place at any of the YSOs surveyed:**

- ❖ Remove or secure any areas/landscaping which provide concealment or are not under use by the program
- ❖ “No closed door” policy
- ❖ Bright lighting in all areas
- ❖ Clear policies for when individuals outside the organization may be allowed in
- ❖ Recording devices (such as video cameras) installed and monitored

### **Policies adopted by YSOs which were not included in the CDC’s recommendations:**

- ❖ Safety committee which reviews policies, procedures, accident reports and advises improvements to board
- ❖ Visual cues or other communication devices for staff and volunteers
- ❖ Personnel know how to approach visitors and interact with unauthorized individuals.

**The Boys and Girls Clubs of America suggests that all clubs complete an Annual Comprehensive Assessment of safety. Assessments are reviewed by a board-led Safety Committee and include an improvement plan with committed dates for improvement.**

## Responding to breaches in policy

### **Most organizations:**

- ❖ Maintain a critical incident reporting tool which includes a written accident or incident report
- ❖ Provide access to a child abuse reporting hotline
- ❖ Require personnel to promptly report inappropriate contact and other questionable interactions/behaviors by program participants or staff to a supervisor.
- ❖ Provide information on external government reporting with respect to known or suspected abuse
- ❖ Maintain clear steps for reporting suspicions as well as emergency response procedures
- ❖ Investigate all reports of suspected abuse, abuse, inappropriate behaviors, policy violations and concerns with minors seriously and carefully.
- ❖ Provide parents with contact information for both male and female staff they may contact to make a report or call in case of questions or concern.
- ❖ Report any evidence of potential child abuse or observation of inappropriate contact by a parent, staff member or other child to the appropriate agency.
- ❖ Perform an investigation following any allegation of child abuse within the organization.
- ❖ Enact a media plan following an allegation of abuse.

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- ❖ Suspend with pay any staff member who is alleged to have abused a child pending the outcome of an investigation. If the allegation is substantiated, the staff member will be terminated.
- ❖ Provide counseling services to staff and affected youth.

## **Some organizations:**

- ❖ Maintain separate procedures for reporting suspected abuse and neglect of youth and violations of the organization's youth protection policies.
- ❖ Hold all adult leaders and youth members responsible for reporting violations of policy.
- ❖ Require staff to immediately report any suspected or known abuse, any indication of or warning signs concerning abuse, whether on or off agency property and whether perpetrated by personnel or otherwise.
- ❖ Expect staff observe other staff members' behaviors, including supervisors, and require staff to report any Code of Conduct violations. If the supervisor does not effectively respond, staff will notify the next level supervisor.
- ❖ Include online, email, and anonymous reporting options.
- ❖ Maintain policies for reports which follow the chain of command unless the report directly involves leadership or others in the chain of command.
- ❖ Maintain policies for responding to allegations of abuse against a staff member which includes securing their personnel file.
- ❖ Notify the national organization of the situation and any next steps as soon as is practical but no later than the initial investigation.
- ❖ Prohibit staff from retaliating against others who in good faith share concerns or policy violations, report observed or disclosed abuse, or suspicion of abuse.
- ❖ Maintain policies for responding to allegations of abuse against a program participant, which may include suspension or termination from the program.

## **Policies recommended by the CDC which are not in place at any of the YSOs surveyed:**

- ❖ Partner with appropriate legal, government, and advocacy agencies and form relationships with these agencies prior to any suspected abuse to ensure proper policies and protocol
- ❖ Know (and disseminate information about) who must report what to whom and when the reporting must occur
- ❖ Keep internal records about child sexual abuse and resolutions
- ❖ Train staff and volunteers on how to deal with the press and community if appropriate
- ❖ Provide support groups, counseling, hold forums, and consider restorative justice approaches
- ❖ Adopt a policy for notifying the wider organization and caregivers that child sexual abuse has happened
- ❖ Debrief or offer support and counseling for reporters and bystanders.

## **Policies adopted by some YSOs which were not included in the CDC's recommendations:**

- ❖ Clear lines of communication between individual programs and the larger organization.

## **Training for staff and volunteers**

### **Most organizations:**

- ❖ Require all staff members (where there is a reasonable likelihood of access to minors) to participate in child abuse prevention training. Training includes the different kinds of abuse and sexual abusers and the organization's child protection policies including the electronic communication policy.
- ❖ Require all staff members working directly with children to undergo a review of the training on an annual basis.
- ❖ Train staff on policies and procedures addressing responsibilities, appropriate behavior and consequences for misconduct.
- ❖ Train staff on supervision of activities and appropriate interactions between adults and youth.



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- ❖ Train staff on responding to allegations, child abuse warning signs, and policies.
- ❖ Require staff to sign and date a copy of the Code of Conduct prior to performing any work duties and annually thereafter. Maintain signed code in the personnel file.

## Some organizations:

- ❖ Train all personnel responsible for hiring employees or approving volunteer workers.
- ❖ Maintain documentation of all training for all personnel.
- ❖ Retrain staff when substantive changes to the policy have been made or as appropriate
- ❖ Ask all departments to review the Code of Conduct annually and have all staff reconfirm their understanding of staff expectations and agree to abide by those expectations.
- ❖ Suspend or terminate any staff member who does not complete the training as required.
- ❖ Include group and individual instruction, apprenticeship, shadowing and self-study training techniques. Include policies for training of late hires and replacements.
- ❖ Define types of abuse of minors including physical, sexual, emotional, neglect, economic, and peer-on-peer.
- ❖ Provide specific training for personnel who serve in specific camps, resident, or day centers.
- ❖ Clearly outline the access that the organization has to all messages, email, internet usage and the like. Also clearly specify internet sites that are unacceptable and let staff know that they will be terminated if they are visiting those or similar sites.
- ❖ Staff are educated about the impact of messages that they post on their personal blogs and profiles.
- ❖ Train staff on how to avoid situations where they are alone with youth or have after-hours or off-site contact with youth.
- ❖ Train staff on the intended outcomes of working with youth and how to run a program and keep it under control.
- ❖ Train staff on spotting and responding to behavioral problems and handling youth with special conditions.
- ❖ Provide specific training on reporting violations of policies and how to report accidents and incidents.
- ❖ Train staff on policies regarding sexual misconduct, physical discipline or injuries inflicted on youth.
- ❖ Provide internal director-level training focused on scope of issues and mechanisms of risk management.
- ❖ Adopt a stance on training not as a one-time event, but an ongoing program to ensure the organization's policies and procedures continue to be consistently applied.

**The YMCA's "Know, See, Respond" program engages staff members in the prevention and reporting processes through behavioral nudges. Signage reminds the staff to stay vigilant and report conduct violations.**

## Policies recommended by the CDC which are not in place at any of the YSOs surveyed:

- ❖ Set measurable goals around the desired behaviors or performance changes and plan the training to meet those goals. Periodically evaluate the training.
- ❖ Adopt an overarching frame for training.
- ❖ Ensure that training content is modeled by everyone in the organization, from top to bottom.
- ❖ Create a "safe space" for training
- ❖ Describe risk and protective factors for victimization and perpetration.
- ❖ Describe how to deal appropriately with risky or compromising situations, such as romantic crushes of youth on employees/volunteers or of employees/volunteers on youth.
- ❖ Acknowledge the power differential between adults and youth and between youth leaders and youth.
- ❖ Teach staff about healthy youth development and how to distinguish between healthy and inappropriate or harmful behaviors when monitoring interactions.

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- ❖ Teach staff how to maintain a balance between providing a nurturing environment and working to prevent child sexual abuse.
- ❖ Teach staff how to talk to a victim who is disclosing child sexual abuse.
- ❖ Seek the counsel of a child advocacy center for advice on training.
- ❖ Know state laws on whether employees/volunteers are immune from civil or criminal liability when making a report and share this information with staff.
- ❖ Reassure staff that they will be supported by the organization in their efforts to protect youth and that debriefing and/or counseling will be available to reporters and bystanders should abuse occur.

## **Policies adopted by YSOs which were not included in the CDC's recommendations:**

- ❖ Some organizations invite outside agencies such as the Red Cross to do trainings for staff.

## **Training for youth and caregivers**

### **Most organizations:**

- ❖ Policies and procedures addressing responsibilities, appropriate behavior and the consequences for misconduct
- ❖ Parents should be provided with a copy of the child protection policy and staff contact info at the start of every program which includes staff contact information will be on the document in case a parent has questions, concerns, or observes a violation.
- ❖ Children should be informed of the policies staff have agreed to follow regarding physical contact, gift giving and outside contact.
- ❖ Minors involved in programs should receive training on technology guidelines and staying safe online before using agency computers or participating in electronic communications with staff.
- ❖ Children should be encouraged to discuss their experiences with their parents and to identify any behavior or activity that made them uncomfortable

### **Some organizations:**

- ❖ Provide orientation for caregivers on the organization's policies, code of conduct and behavioral expectations of youth.
- ❖ Provide caregivers with written orientation materials which include the babysitting policy, outside contact policy, electronic communication policy, and information on child abuse. Have caregivers acknowledge the receipt of these materials.
- ❖ Provide caregivers with tips to help identify and talk with youth about different kinds of abuse as well as questions to ask children on a regular basis in order to detect abuse concerns
- ❖ Discuss with parents the purpose of appropriate physical contact in programs like gymnastics and aquatics to provide the necessary instruction, coaching, and spotting.
- ❖ Provide parents with a resource guide for protecting children including definitions of abuse and how to respond
- ❖ Teach youth how to avoid various risky behaviors.
- ❖ Training should inform minors that any sexually explicit image of a minor is considered child pornography, even if the minor created the images themselves, and that, any persons in possession of these images, including the minor themselves, may be subject to child pornography production, possession and distribution laws.
- ❖ Teach youth about cyber safety

## **Policies recommended by the CDC which are not in place at any of the YSOs surveyed:**

- ❖ Challenge commonly held myths about child sexual abuse

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- ❖ Discuss how to talk to their children about sexuality and child sexual abuse as well as how to talk to other adults about child sexual abuse both before and after any suspicion of sexual abuse has been raised.
- ❖ Explain caregivers' responsibility to act if they witness or hear about inappropriate or harmful behaviors and describe warning signs for sexually offending behaviors and victimization.
- ❖ Provide resources for seeking help outside the organization, such as child sexual abuse prevention organizations.
- ❖ Delineate responsibilities of the caregiver and the organization.
- ❖ Encourage caregivers to attend sessions and programs whenever they can to make sure that youth are being protected and that policies are being followed
- ❖ Teach youth how to interact appropriately with each other. Educate youth about healthy sexuality, how to recognize appropriate behavior, and how to avoid exploitive or inappropriate behavior toward others.
- ❖ Seek assistance from other organizations that have created personal safety programs if your organization is interested in implementing one.
- ❖ Discuss the importance of reporting sexual abuse and empower youth to intervene or tell someone when they see inappropriate or harmful interactions between adults and youth or between youth and youth. Encourage youth to tell a trusted adult about inappropriate or harmful things that have happened to themselves or their friends.
- ❖ Empower youth as partners in the prevention process by educating youth about the bystander approach and teaching them how to report inappropriate or harmful behavior.

## Others not included in CDC guidelines

### Agency culture

#### **Most organizations:**

- ❖ Have a youth protection commitment and policy statement as well as a code of conduct

#### **Some organizations:**

- ❖ Are involved in various Coalitions and Task Forces at the national level.
- ❖ Maintain a safety team at each program which includes individuals outside the organization and reviews policies, procedures, and accident reports. Safety teams also conduct audits, inspections and suggest and/or facilitate corrective measures.
- ❖ Have solid partnerships with outside organizations.
- ❖ Youth protection "Champions" help create a culture of awareness and safety and ensure their units follow youth protection policies.

### Technology

#### **Most organizations:**

- ❖ Have an acceptable use policy for technology when staff, volunteers or members are involved and monitor personnel and participant internet use. Audit internet usage regularly.
- ❖ Have a policy which prohibits personnel from intentionally exchanging, transmitting, soliciting or receiving and retaining any sexually explicit material in writing or pictures
- ❖ Prohibit the use of cameras or cell phones by members in shower houses, restrooms, or locker room areas.
- ❖ Provide resources for youth and caregivers on safe internet usage
- ❖ Require staff to conduct all electronic and other communications with minors in an open manner that maximizes their accountability. This may include an official social media presence approved by and subject to monitoring by the organization.



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## Some organizations:

- ❖ Require that supervisors and other senior leaders are given the necessary user names, passwords, and permission to access and administer program social media accounts and have the ability to monitor accounts at any time.
- ❖ Have specific policies on appropriate online messaging between youth and staff which includes parent awareness and permission.
- ❖ Caregivers are invited to participate and must give consent in writing before their minor children are allowed to participate in social media groups or pages.
- ❖ Personal identifiable information, photos or videos of minors will not appear on social media groups or pages unless permission is granted in writing by the youth and their caregivers
- ❖ Only first names of minors are used to identify minors in online photos or videos.
- ❖ Have policies in place for individuals who inadvertently receive sexually explicit material. This includes proper reporting and responding procedures, documentation, and notification. Policies include a commitment to support the child if the situation was accidental and discipline violators and discourage repeat actions if the incident was intentional.