Prevention Improvement Process

The Change Process

- How does each policy or practice compare to best practices?
- What is the resulting level of risk in each area (High, Medium or Low)?
- How can each be improved to lower risk?
- Who needs to be involved to modify each of them?
- What obstacles must be overcome to improve them?
- What is the cost to improve each of them?
- Who can start the change process on each of them?

Determine Your Starting Point

- What prevention policies and practices exist?
- Are they board approved and formalized?
- Are they effectively and sufficiently documented?
- Are they effectively and sufficiently communicated?
- Are they effectively and sufficiently enforced?

Prioritizing Needed Changes

- Which changes are the easiest to make?
- Which changes are the least expensive to make?
- Which changes can be done strictly within the district?
- Which changes involve the least number of people?
- Which changes would create the biggest improvement in child safety?
- Which changes would most significantly lower the district’s liability?
Best Practices #1 - Determine Your Starting Point

- Compile your formal child sexual abuse prevention policies. What do you have documented in your:
  - Employee handbook?
  - Site safety plan?
  - Emergency plan?
  - Title IX procedures?
  - HR process?

- Document your informal child sexual abuse prevention practices. What are the known boundaries and behaviors that you and your staff practice that are not documented?

- Identify organizational or cultural barriers. Which of the following barriers are a challenge in your district?

  - Fear of being wrong
  - Fear of civil lawsuits
  - Fear of criminal charges for failure to report
  - Fear of retribution by the accused
  - Fear of increase in insurance premiums
  - Fear of loss of licensing or ability to continue operations
  - Fear of marred reputation in the community
  - Fear of reporter identity being kept confidential
  - Fear of opening a can of worms
  - Denial and disbelief
  - Culture of silence/secrecy
  - Culture of intimidation and victim harassment
  - Lack of knowledge

  - Investigation is best handled internally
  - Best handled internally
  - Putting adults’ rights before children’s
  - Cognitive dissonance
  - Collegial/organizational loyalty
  - Report only abuse at home
  - Lack of time/money
  - Do the minimum the law requires
  - Abuser won’t do it again
  - Not part of our core competencies
  - Philosophy of trust/forgiveness
  - Protecting friends/family
  - Damage control
  - Outright cover-up
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**Best Practices #2 - Manage Access to Children**

- **Document responsibility for your child sexual abuse prevention best practices program.**
  - Who is ultimately responsible for the protection of children in your youth programs?
  - Where is it documented?
  - How is it communicated to staff, parents, and youth?

- **Integrate child protection into the applicant screening process.**
  - Do you encourage or discourage your staff to respect their intuition?
  - Do you incorporate multiple interviews for staff and volunteers?
  - Do you include character focused questions in the interview process? If so, do you have a list of questions documented? If so, what are the questions?
  - Do you incorporate general and child sexual abuse boundary questions in your interviews? If yes, what questions do you ask? Are the questions documented along with responses that would be concerning?
  - Do you discuss your child sexual abuse prevention program with your staff and volunteer candidates?
  - How do you formalize the feedback process from interviewers so that they are making independent recommendations and are not influenced by ‘Groupthink’?
  - Do you have a standardized process used by all staff who are conducting reference checks? If so, what is the process and where is it documented?
  - What is your standard process for background checks?
    - Is the process utilized for all staff and volunteers (long-term and event based)?
    - Do you do fingerprint based criminal background checks?
    - Are the criminal background checks nationally based?
    - Are the criminal background checks multi-state, if your candidate has moved out-of-state?
    - Does the background check process look at the Registered Sex Offender Registry?
    - Do you check the Child Abuse Registry through your local child protective services agency?
    - Do you check applicable licensing and certification agency records?
    - Do you check your candidate's personnel file, if they are within the city/county? How far back?
    - Do you check your internal records to see if the candidate (staff and volunteers) has been previously dismissed or disqualified during an earlier screening process?
    - Do you do an internet and social media search?
    - Is the full process completed prior to hiring or bringing on volunteers?
    - Do you have a list of pre-established disqualifiers that the results are checked against?
    - Are background checks done on a recurring basis after hire or volunteer assignment?
  - Do you have a list of red flags to look for in the screening process?
    - What are the red flags in the application process?
    - What are the red flags in the interview process?
    - What are the red flags in the reference check process?
    - What are the red flags in the background check process?
Best Practices #3 - Set, Document and Enforce Boundaries

- **Boundary Documentation.** As you review each category to see what boundaries you already have in place, answer the following questions for each boundary or process:
  - Does a formal boundary policy or process exist?
  - Does an informal boundary or process exist?
  - If both exist, do they conflict in any way? What actions should be taken to resolve the conflicts?
  - Do the formal or informal boundaries and processes meet informed best practices?
  - What is the level of risk of your existing boundaries – high, medium, or low?
  - How can they be modified to minimize the risk of sexual misconduct?
  - Have these boundaries and processes been reviewed and approved by appropriate authorized administrators?
  - Where are these boundaries documented?
    - Employee handbook?
    - Site safety plan?
    - Title IX procedures?
    - Registration package?
    - By mail, e-mail, electronic newsletter?
    - City/County or program website?
    - Other?
  - How is the documentation communicated, distributed, and accessed by:
    - Staff?
    - Volunteers?
    - Parents?
    - Youth?
  - Are the documentation locations as well as the communication, distribution, and access methods sufficient to keep the information top-of-mind and ingrained in the culture?
  - How are these boundaries integrated into the daily routine and culture of the organization?
  - How often are the boundaries and processes reviewed and assessed for effectiveness?
  - Does the review process include feedback from staff, volunteers, parents, and youth?
  - Who is responsible to lead the review process?

- **On-Site Boundaries: Access.** What boundaries and processes are in place to protect children from unauthorized people accessing them when they are on your premises? Do you have policies regarding:
  - On-site visitor registration and supervision?
  - Approval and supervision of registered sex offenders' who request on-site access to their children?
  - Hardcopy or electronic possession or storage of sexually explicit images or materials on campus?
  - Internet access for staff, volunteers, parents, and youth in all areas accessed by youth or by city/county owned devices?
  - General usage policies for staff, volunteers, parents, and youth - for facility installed electronic devices, city/county owned/supplied electronic devices, and personal electronic devices?
  - Social media and electronic app usage on city/county property?
  - Systematic enforcement of your electronic boundaries?
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Best Practices #3 - Set, Document and Enforce Boundaries (continued)

- **On-Site Boundaries: Isolation.** What boundaries and processes are in place to prevent 1) youth from being isolated, and 2) failure to supervise, when they are on your premises? Do you have policies regarding:
  - One adult - one child situations?
  - Approved and off-limits on premise locations?
  - Pulling children out of their regularly scheduled program?
  - Before or after school/program help?
  - Monitoring infants, toddlers and non-verbal children?
  - Video cameras in locations serving children with disabilities and other high-risk areas?
  - Family members working together?
  - Monitoring nap time?
  - Supervision during movies and other lights out activities?
  - Observable diapering and bathroom monitoring?
  - Use of rovers?
  - Parental access and supervision for infants and pre-school age children?

- **On-Site Boundaries: Behavioral.** What boundaries and processes are in place to protect children from others' inappropriate behavior when they are on your premises? Do you have policies regarding:
  - Unprofessional behavior?
    - Inappropriate comments, stories, jokes
    - Being flirtatious
    - Snapping bra straps
    - Comments about hair, clothing, and make-up
    - Staff talking about their personal hygiene, struggles, or sex-life
    - Giving preferential treatment to a student
    - Hanging out with students
  - Intimidation: Secrets, lies, threats, coercion, and violence?
  - Sexual discussions and exposing youth to pornography or sexually explicit material?
  - Limiting physical touch?
    - Kissing
    - Massage
    - Stroking hair or body
    - Front-to-front or front-to-back hugs
    - Sitting on laps
    - Physical horseplay, piggy back rides, or typical games
    - Assisted instruction that includes body-to-body touching such as batting, violin, etc.
    - Excessive touching of any kind
Best Practices #3 - Set, Document and Enforce Boundaries (continued)

- **On-Site Boundaries: Behavioral.** (Continued)
  - Showing with children or changing clothes in front of each other?
  - Entering children’s rooms at night?
  - Limiting medical exams and treatments by staff?
  - Sharing of alcohol, illicit drugs, prescription drugs, or over-the-counter drugs?
  - Photographs of kids?
  - Hands in other people’s pockets?
  - Keeping hands where they can be seen?
  - Masks, blindfolds, bondage, scatting, fetishisms, and rituals?

- **Off-Site Boundaries.** What boundaries and processes are in place to protect children when your programs require off-premises travel? Do you have policies regarding:
  - List of evaluated and approved locations?
  - Written authorization processes for staff requests and parental permission?
  - Transportation control and supervision?
  - Parent chaperones?
  - Staff and volunteers meeting with children in hotel rooms?
  - Staff and volunteer alcohol and drug use (illicit and prescription)?

- **Off-Hours Boundaries.** What boundaries and processes are in place to protect children from inappropriate staff relationships during off-hours that cannot be monitored by other city/county staff? Do you have policies regarding:
  - Babysitting and tutoring?
  - Visits to personal residences and sleepovers?
  - Attending birthday parties and family gatherings?
  - Hanging out with or traveling with students?
  - Dating students?

- **Electronic Communication and Social Media Boundaries.** What boundaries and processes are in place to protect children from isolated electronic communication? Do you have policies regarding:
  - Using social media applications for program communication, etc.?
  - Sharing phone numbers, e-mail addresses, and screen names?
  - Staff and volunteer’s privacy settings and use of inappropriate images and content on social media?
  - Being ‘friends’ or ‘following’ on social media applications?
  - Communicating with children by video chat applications or any other electronic means?
Best Practices #3 - Set, Document and Enforce Boundaries

- **Child-to-Child Boundaries.** What boundaries and processes are in place to protect children from being abused by other minors? Do you have policies regarding:
  - Visibility and monitoring during nap time?
  - Monitoring bathroom visits?
  - Separating age groups?
  - Avoiding inadvertent creation of authority of older minors?
  - Supervision of children, especially when in mixed age groups?
  - Supervision of children with disabilities, especially those who are immobile or non-communicative?

- **Gift Boundaries.** What boundaries and processes are in place to keep children and families from becoming indebted, inappropriately influenced by, or blackmailed by staff and volunteers? Do you have policies regarding:
  - Tangible and intangible gifts to children?
  - Tangible and intangible gifts to parents or caretakers?
  - Loans to parents or caretakers?