



Recommendations for Developing Policies and Procedures that Prevent Child Sexual Abuse Within Organizations Serving Youth

Adapted from: Preventing Child Sexual Abuse Within Youth-Serving Organizations: *Getting Started on Policies and Procedures*, U.S. Department of Health and Human Services, Centers for Disease Control and Prevention National Center for Injury Prevention and Control, Division of Violence Prevention, Atlanta, Georgia, 2007. Contact: 1-800-CDC-INFO, www.cdc.gov/injury, CDCinfo@cdc.gov.

This document addresses specifically child sexual abuse. However, whether you are developing new policies or revising existing policies, keep in mind the overall well-being of the children and youth in your care. The purpose of policies and procedures is to provide a healthy environment which protects children from harm. It is important to find the balance between being vigilant and protective of youth and being so hyper-vigilant that the positive parts of the program (i.e. relationships between youth and adults) are lost.

Include definitions:

1. **Children and youth** include anyone between the ages of zero and 17 years.
2. **Child sexual abuse** involves any sexual activity with a child where consent is not or cannot be given. This includes sexual contact that is accomplished by force or threat of force, regardless of the age of the participants, and all sexual contact between an adult and a child, regardless of whether there is deception or the child understands the sexual nature of the activity. Sexual contact between an older and a younger child also can be abusive if there is a significant disparity in age, development, or size, rendering the younger child incapable of giving consent. The sexually abusive acts may include sexual penetration, sexual touching, or non-contact sexual acts such as exposure or voyeurism.

Things to consider as you develop/revise policies and procedures

- Create policies and procedures that apply specifically to your organization
- It is critical that organizations abide by their youth protection policies and procedures to avoid being criticized for not adhering to them if a youth is sexually abused
- Your mission and activities. If the organization provides 1:1 youth mentoring, policies and procedures must be adopted that protect youth in 1:1 situations.
- Culture and language of youth served by the organization
- Insurance requirements
- Available resources
- State and national laws. Consult with a legal representative. Another resource is the Child Welfare Information Gateway at: www.childwelfare.gov/systemwide/laws_policies/search/index.cfm

- Balance the need to keep youth safe with the need to nurture and care for them

Six Key Components to Prevent Child Sexual Abuse

1. Screening and Selecting Employees and Volunteers

Goal: *to select the best possible people for staff and volunteer positions and to screen out individuals who have sexually abused youth or are at risk to abuse.*

- a) Inform applicants about your organization's policies and procedure for protecting youth. This may deter some people at risk of abusing youth from applying for staff or volunteer positions.
- b) Share your code of conduct or ethics.
- c) Require applicants to sign a document describing the policies and procedure of your organization to demonstrate their understanding and agreement.
- d) Ask applicants if they have a problem with any of the policies and procedures.
- e) Ask about previous work and volunteer experience.
- f) Provide a permission form for contacting personal references and performing a criminal background check. The permission statement should include an indemnification clause developed by an attorney to protect your organization from false allegations or other legal issues.
- g) Ask open-ended questions that encourage broad answers. These will provide material for follow-up in the personal interview and throughout the screening and selection process. Examples: *What type of supervisory situation do you prefer? What age/gender of youth do you want to work with? How would you feel about working with a different age/gender? Is there anyone who might suggest that you should not work with youth? Why? What would you do in a particular situation?* Include scenarios that involve boundary issues or situations where applicant would need to follow a specific procedure.
- h) Use disclosure statements to ask applicants about previous criminal histories of sexual offenses, violence against youth, and other criminal offenses. The applicant may not disclose past offenses, but the inquiry will demonstrate your organization's seriousness about protecting youth and may deter certain individuals.
- l) Clarity that you are interested in learning about an applicant's past perpetration of child abuse rather than a history of victimization.

Carefully document all information gathered!

Conducting Reference Checks

- a) Obtain verbal, not just written, references for applicants. Conversations provide more information and allow more follow-up questions.
- b) Match references with employment and volunteer history. Is anything missing? Ascertain you obtain a variety of sources, not just family members and friends.
- c) If a former employer will provide only basic information such as dates of employment or rehiring eligibility, clarify whether the person providing the reference is limiting information because of company policy.

Suggested Reference Check Questions

- *How would you describe the personal characteristics of the applicant?*
- *How does the applicant interact with youth?*
- *Why would this person be a good candidate for working with youth? Is there any reason this person should not work with youth?*
- *Have you seen the applicant discipline youth (other than his or her own children?)*
- *Would you want this person to be involved in your organization again?*

Criminal Background Checks

While an important tool in screening and selection, criminal background checks will not identify most sexual offenders because most have not been identified. This sometimes gives an organization a false sense of security!

- Save time and resources by delaying criminal background checks until the end of the screening and selection process.
- Obtain permission from applicants before completing the check.
- Determine the type and level of check required for each applicant: name, fingerprint, sex offender registries, and social security number. Records are not linked from different states or countries. Employers may need to conduct multiple checks for applicants who have moved.
- Plan for the time and financial resources needed to conduct checks.
- Decide which offenses to examine which offenses will disqualify applicants. As an example: only offenses resulting in conviction may be used.
- Develop procedures to keep the results of criminal background checks confidential. Locked files with limited access.
- Ensure that your organization's process for conducting checks is legally sound. Consult laws, regulations, your insurance company, and attorney.

Additional strategies to consider

- a) The need to assess the applicant's home environment depends upon the mission of the organization, i.e., if youth meet at the homes of their mentors.

b) Keep internal records of applicants who are disqualified during the screening process and employees/volunteers who are dismissed because of an offense. Employees would check this list prior to screening future applicants.

c) It is difficult to verify accuracy of information found on the internet. When using internet searches, be aware that more than one person can share the same name.

2. Guidelines on Interactions Between Individuals

Goal: to ensure the safety of youth in their interactions with employees or volunteers and with each other.

Critical Strategies for Guidelines on Interactions Between Individuals

a) Appropriate, positive interactions among youth and between employees and volunteers is essential in supporting positive youth development, making youth feel valued, and providing the caring connections that serve as protective factors for youth. Conversely, inappropriate or harmful interactions put youth at risk for adverse physical and emotional outcomes. Therefore, it is important for organizations to identify behaviors that would be categorized as appropriate, inappropriate, and harmful. These behaviors can be identified in the code of conduct/ethics.

Verbal Communication

Appropriate

Praise

Positive reinforcement for good work or behavior

Inappropriate/harmful

Sexually provocative or degrading comments or put-downs

Risque jokes

Physical behavior

Appropriate

Pats on the back or shoulder

Inappropriate/harmful:

Patting the buttocks

Intimate/romantic/sexual contact

Corporal punishment

Showing pornography or involving youth in pornographic activities

b) Set appropriate ratios for the number of employees/volunteers to youth keeping in mind the following variables: age and developmental level of youth, risk of the activity, and location of the activity (classroom vs. park)

c) Encourage employees/volunteers to actively interact with youth to maintain adequate supervision and monitoring. When adults are immersed in their own conversation, they are not providing satisfactory ratios.

One-on-One Interactions. To prevent the isolation of one adult and one youth, some organizations limit 1:1 interactions. Here are several policy options:

- a) Make this a mandatory policy at all times.
- b) Make this policy dependent on the risk of the activity or situation, such as overnight trips.
- c) Maintain other safeguards such as extra supervision or contact with youth and employees/volunteers, more stringent screening if the mission of your organization requires 1:1 time between adult and youth.
- d) Consider a “buddy system” to prevent isolation of youth with employees or volunteers.

Risk of Interactions Between Youth

- a) Address all situations where unsupervised youth can sexually or physically abuse other youth. Consider restricting certain activities where risk exists.
- b) Develop policies to deal with bullying and sexual abuse so that positive interactions can be promoted and everyone is clear about inappropriate or harmful interactions.
- c) Organizations can maintain a similar policy to the 1:1 policy options above.

Out-of-Program Contact Restrictions

If your organization has multiple program areas where people not affiliated with youth services have access, or if multiple organizations share space, consider a sign-in/out procedure as well as visitor monitoring.

Caregiver Information and Permission

In addition to obtaining the essential/required caregivers’ contact information, obtain caregivers’ permission for youth to participate in certain activities such as field trips, late-night activities, social gatherings with guest performers, etc.

3. Monitoring Behavior

Goal: *to prevent, recognize and respond to inappropriate and harmful behaviors and to reinforce appropriate behaviors.*

Critical Strategies for Monitoring Behavior:

- a) Use formal and informal supervision to observe and monitor how employees and volunteers interact with youth. Document the observations/monitoring.
- b) Responding to what is observed in interactions among youth and between employee/volunteers and youth:

- Develop a protocol so that employees/volunteers are clear about their roles and responsibilities. They need to respond immediately to inappropriate or harmful behavior, potential risk situations and boundary violations.
 - Enforce the protocol so that appropriate actions follow. Supervisors need to redirect inappropriate behaviors to promote positive behaviors, confront inappropriate or harmful behaviors, and report these if necessary.
- c) Define roles and responsibilities of all employees and volunteers who are responsible for monitoring behavior and interactions.
- d) Establish a clear reporting structure so that everyone knows who to contact if they observe potentially inappropriate or harmful behavior. Direct-line reporting as well as back-up reporting (involves direct-line authority) must be clarified.
- e) Create a climate that encourages people to question confusing or uncertain behaviors and practices.

4. Ensuring safe environments

Goal: *to keep youth from situations in which they are at increased risk for sexual abuse.*

Critical Strategies for Ensuring Safe Environments:

- a) Visibility: Use spaces that are open and visible to multiple people and minimize sexually abusive behaviors:
- Landscape to ensure open, visible spaces with no concealment
 - Have clear lines of sight through the building
 - Secure areas not used for programming to prevent youth from being isolated
 - Install windows in doors
 - Institute a “no closed doors” policy
 - Install bright lighting in all areas
- b) Provide privacy when toileting, showering, changing clothes to reduce risk.
- c) Establish access control:
- For admitting and releasing youth to assure their whereabouts
 - For people from the outside being allowed in areas where youth are present
- d) Define and communicate your organization’s on-site and off-site physical guidelines/boundaries (i.e. how to handle off-site bathroom breaks during field trips)
- e) Develop transportation policies, including who is responsible for transporting youth to and from regular activities and special events
- When is the organization responsible for transportation?
 - When is a parent or caregiver responsible?
 - Can a youth ride in a car with an employee or volunteer? If yes, under what circumstances? (i.e. alone in a car)
 - What are pick-up procedures at the end of the day or event?

5. Responding to inappropriate behavior, breaches in policy, and allegations and suspicions of child sexual abuse.

Goal: to respond quickly and appropriately to (1) inappropriate or harmful behavior, (2) infractions of child sexual abuse prevention policies, and (3) evidence or allegations of child sexual abuse.

Critical Strategies for Responding to Inappropriate Behavior, Breaches in Policy, and Allegations and Suspicions of Child Sexual Abuse.

- a) Define the continuum of appropriate, inappropriate, and harmful behaviors.
- b) Delineate what behaviors your organization will respond to internally (i.e. a youth tells a risqué joke) and what behaviors will require reporting to authorities. (i.e. sexual contact).
- c) Act on infractions of your organization's child sexual abuse prevention policies. (i.e. an employee or volunteer having contact with a youth outside of your organization.)
- d) Report when an employee or volunteer witnesses or learns about sexual abuse of youth by any of the following:
 - Another volunteer or employee
 - Another youth within the organization
 - Someone outside the organization
- e) Include information about where to report specific offenses within your policies.

Reporting Process

- a) If evidence of child sexual abuse has surfaced or an allegation has been made, a formal report needs to be made to the appropriate outside agency. In Milwaukee County, all cases of child abuse are reported to the Bureau of Milwaukee Child Welfare. Sexual assault is also reported to the Police Department.
- b) Develop clear guidelines about how and when to report allegations and suspicions to authorities. These should be reported to very few people inside the organization before authorities are contacted to expedite the process and minimize the number of times a youth has to repeat allegations.
- c) Be explicit that the head of your organization is professionally and legally accountable for ensuring that all cases of abuse are reported to the proper authorities.
- d) REPORT TO THE AUTHORITIES ANY TIME THERE IS A REASONABLE SUSPICION OF CHILD ABUSE OR NEGLECT!**
- e) Do NOT conduct your own investigation, but, depending on the circumstances, it may be appropriate to ask a few clarifying questions of the youth or person making the allegation to adequately report the suspicion or allegation to the authorities.

Internal Records – tracking allegations and suspicions of child sexual abuse

- a) Include child sexual abuse as a category on general incident reporting forms for significant physical injuries. Forms are completed by the employees or volunteers who first learn of the abuse.
- b) The supervisor of the employee or volunteer needs to review the incident report.
- c) Refer child sexual abuse reports to a higher-level individual within the organization who will ensure that organizational procedures are followed.
- d) Always record the resolutions of child sexual abuse cases.

Confidentiality Policy (Ensure your organization's confidentiality policy is consistent with state legal requirements)

- a) Withhold the names of potential victims, the accused perpetrator, and the people who made the report to authorities.
- b) Decide whether to inform the community about the allegation.

Response to the Press - Decide upon a strategy before an allegation is made.

- a) Designate a spokesperson for questions and inquiries.
- b) Have employees/volunteers go through training on how to deal with the press and the community, if appropriate.

Membership/employment of alleged offenders

- a) An allegation does not equate to guilt. The person reported should not be labeled. However, your organization must take steps to protect the youth in its care.
- b) Either suspend the membership or employment or put the alleged offender on probation immediately after the report until the case is resolved legally. Put an appeal process in place so that people found not guilty of perpetration in court may apply to return to their former position within the organization. Or...
- c) If your organization decides that suspending or terminating membership or employment is not feasible or sends the wrong message, develop a well-constructed policy to include:
 - Limited access agreements in which alleged or convicted offenders can attend a worship service or activity that does not involve youth. Individuals may attend services or certain activities with another adult who agrees to monitor them at all times.
 - Provide informed supervision with at least one informed staff member who is instructed to vigilantly supervise the accused adult or youth in all his/her interactions within the organization.

Additional Strategies to Consider

Support for victims and families

- Provide referrals for victims and their families to child sexual abuse organizations, counselors or therapists.
- Reimburse victims and families for counseling.
- Offer restorative justice approaches. (Respectful and safe dialogue when a misunderstanding or a harm has occurred.) Seek assistance from organizations with expertise in these techniques.

Restorative Justice centers in Milwaukee County

1. **Wisconsin Community Services, Inc.** 414/290-0400
2. **Marquette University Law School:** 414/288-7090
3. **Community Conferencing Program:** 414/278-4655

Coping process for the organization and community

- Adopt strategies to show that steps are being taken to deal appropriately with the situation, providing support groups, having forums to discuss the topic and respond to questions.
- Adopt a policy for notifying the wider organization and caregivers that child sexual abuse has occurred. (Maintain Confidentiality Policy)
- Train caregivers on how to talk to youth about child sexual abuse.
- Debrief or offer support and counseling for reporters and bystanders.
- Seek assistance in using restorative justice to help the community heal.

6. Training about child sexual abuse prevention

Goal: *to give people information and skills to help them prevent and respond to child sexual abuse.*

Objectives in training

- a) Set measurable goals. What are the desired behaviors or performance changes in trainees? What is essential?
- b) Design the training to meet the goals.
- c) Evaluate the training periodically to ensure that it meets goals.
- d) Decide if your organization wants to use an overarching frame, such as
 - Healthy sexuality (help everyone distinguish the difference between healthy, normal behavior vs. sexual abuse).
 - Rights and responsibilities (everyone has the right to be treated appropriately and the responsibility to treat others appropriately).

Integration of content into the entire organization

- a) Ensure that training content is modeled by everyone in your organization from management to employees/volunteers.
- b) Training content should be evident in performance measures, supervisors' feedback, caregivers' observations, and treatment of youth in organization.
- c) Meld elements of the organization's philosophy into the child sexual abuse training, i.e. a faith-based organization would include elements of faith into the content.

Training Techniques

Delivery: In person, through videos, online, written or in combination

Interactivity: Can be passive, interactive or a combination (When trainees are actively engaged, they are more likely to retain messages, information and skills.)

Frequency: Important messages need to be reinforced. Training should be ongoing, not just a one-time event. Educate in both formal training sessions and in informal settings, conversations.

Methods: Using several methods will reinforce messages and help individuals with different learning styles to absorb the information and skills.

- Case studies involving problem-solving
- Role-playing situations
- Journaling following a presentation or discussion
- Invite outside professionals to conduct training

Mechanisms to ensure that training happens:

- Develop a regular training schedule that best fits organization's work.
- Integrate training into the overall child sexual abuse prevention policy and into staff member's work plans.
- For individuals – require periodic certification based on training completion.
- To same money, resources and time:
 - Ask for help from groups who provide this type of training.
 - Work together with similar organizations to develop/implement training.
 - Partner with other organizations such as child advocacy centers, sexual violence coalitions, universities.

Important considerations in training

- Create a safe environment in which trainees feel comfortable raising questions and concerns.
- Designate one point of contact for questions and concerns about any aspect of child sexual abuse. All employees/volunteers need to know the point of contact.
- Decide who needs to be trained in child sexual abuse prevention.
- Train individuals in all the policies/procedures your organization adopts.

Critical content of child sexual abuse information

- a) Provide a definition of child sexual abuse.

- b) Define the continuum of appropriate, inappropriate, and harmful behaviors from your organization's perspective.
- c) Provide information about the prevalence of child sexual abuse.
- d) Describe risk and protective factors for victimization and perpetration.
- e) Address common myths about offenders, such as the myth that most people who sexually abuse are strangers to the youth.

Importance of preventing child sexual abuse

- a) Emphasize that employees/volunteers are an integral part of your organization's efforts to create a safe, healthy, and respectful environment.
- b) Explain that child sexual abuse policies protect youth from sexual abuse, adults and youth from allegations of sexual abuse, and organizations from being accused of not doing enough to protect children.
- c) Help everyone in the organization to feel comfortable and motivated to prevent child sexual abuse. Give opportunities for questions and concerns.

Personal conduct

- Define appropriate conduct.
- 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.
- Inform employees/volunteers of their responsibility to act when they see or hear about inappropriate or harmful behavior.

Healthy development of youth

- Teach employees/volunteers about healthy youth development.
- Educate employees/volunteers about sexual development and how to distinguish between healthy and inappropriate or harmful behaviors when monitoring interactions.
- Keep in mind that some behavior that is considered developmentally appropriate may create problems for organizations when it is done at inappropriate times.

Protective factors

- Help employees/volunteers learn to maintain a balance between providing a nurturing environment and working to prevent child sexual abuse.
- Assist employees/volunteers in learning how to interact with youth with care and concern in order to foster healthy youth development.

Handling disclosures

- Employees/volunteers need to be able to respond appropriately to the person making the disclosure:

- Teach employees/volunteers what they should and should not say to a victim who is disclosing child sexual abuse or to a witness of the abuse.
- Follow procedures established for reporting allegations, suspicions or disclosures of abuse and for dealing with the alleged perpetrator.

Immunity and support for reporters

Employees and volunteers need to know whether they are immune from civil or criminal liability when making a required or authorized report of known or suspected child sexual abuse. (Check with counsel or state law) Reassure employees/volunteers that the organization will support them.

Training Parents, Guardians and Caregivers

Adults and youth caregivers need to understand child sexual abuse and their role in preventing it.

- a) Define child sexual abuse, including the continuum of appropriate, inappropriate, and harmful behaviors.
- b) Caregivers should be informed about your organization's child sexual abuse prevention policies and procedures so that they know what is expected of them.
- c) Challenge commonly held myths about child sexual abuse.
- d) Describe warning signs for sexually offending behaviors and victimization.
- e) 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 or after any suspicion of abuse has been raised. (Role-playing can be helpful)
- f) Explain caregivers' responsibility to act if they witness or hear about inappropriate or harmful behaviors.
- g) Describe where to go for help within your organization, and identify the point person for child sexual abuse within the organization.
- h) Provide resources for seeking help outside the organization.

Training Youth

Child sexual abuse education and training for youth should be both developmentally appropriate and at the proper skill level. Different skills and knowledge may be provided to adolescents and younger children.

- a) Provide general information about healthy sexuality vs. child sexual abuse, and appropriate/inappropriate/harmful behavior; that no one has the right to force, trick or coerce them into sexual situations; and that sexual offenders, not their victims, are responsible for their behavior.
- b) Teach youth how to interact appropriately with each other.
- c) Discuss the importance of reporting sexual abuse.
- d) Tell youth to whom they should report inappropriate or harmful behavior.
- e) Seek assistance from organizations that have created safety programs.
- f) Educate youth about the bystander approach.

[Adaptation prepared by The Parenting Network]