

This sample document was prepared by *The Parenting Network*, www.theparentingnetwork.org, for organizations serving children and youth to use as a guide in developing or revising comprehensive policies and procedures to protect children and youth from abuse and neglect. Reference for this sample is *Preventing Child Sexual Abuse Within Youth-Serving Organizations: Getting Started on Policies and Procedures*, U.S. Dept of Health and Human Services, Centers for Disease Control and Prevention, Atlanta, GA 2007, www.cdc.gov/injury, CDInfo@cdc.gov. Any agency creating or updating such policies should consult with its board of directors and attorney.



A to Z Youth Center

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Phone 414/555-1212

POLICIES AND PROCEDURES to Protect Children and Youth from Abuse and Neglect

The **A to Z Youth Center** is committed to providing a healthy, nurturing environment for youth ages 7 to 14. **A to Z Youth Center** has served the Milwaukee community since 1981 and has been supported by local foundations and through tuition reimbursement. The Center strives to enrich family life by helping youth develop socially, emotionally, and academically. These goals are achieved through structured programs including organized athletic activities, chaperoned field trips, and ongoing mentoring and homework assistance, as well as opportunities for social interaction and fun! As youth caregivers, the Center partners with parents in the role of committed stewards of each child's well-being.

These policies and procedures are a component of the **A to Z Youth Center Employee and Volunteer Handbook** which outlines all practices to ensure the well-being of the youth in our care.

DEFINITIONS of CHILD ABUSE and NEGLECT

Child Abuse Defined

Abuse can be physical, sexual, or emotional, or it can be any form of neglect. The Federal Child Abuse Prevention and Treatment Act (CAPTA) defines abuse as “any recent act or failure to act on the part of a parent or caretaker which results in death, serious physical or emotional harm, sexual abuse or exploitation; or an act or failure to act which presents an imminent risk of serious harm.” This applies to any young person under the age of 18.

Physical Abuse Defined

Physical abuse is any physical injury caused by hitting, beating, punching, shaking, kicking, or biting - or any other physical harm to a child. The injury may or may not be intentional. It may result from over-discipline or punishment.

Child Sexual Abuse Defined

Child sexual abuse involves any sexual activity with a child or youth. This includes sexual contact that is accompanied by enticement, 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 can be abusive if there is a significant disparity in age, development, or physical size. The sexually abusive acts may include sexual penetration, sexual touching, or non-contact sexual acts such as exposure or pornography.

Emotional Abuse Defined

Emotional abuse may involve verbal or psychological abuse or mental injury. It includes acts or omissions by parents or other caregivers that have caused, or could cause, serious behavioral, cognitive, emotional, or mental disorders. Emotional abuse may also include extreme or severe acts of punishment. Physically or sexually abused children are usually emotionally abused as well.

Neglect Defined

While there are several forms of neglect, including educational, emotional, environmental, medical, and developmental, child protection agencies usually use the term to mean physical neglect. Physical neglect is the failure to meet a child’s basic physical needs, such as food, shelter, clothing, and hygiene. Neglect is a form of abuse.

NOTE: The definitions above usually pertain to adults and caregivers. Within our Center, we are also concerned about youth-on-youth abuse, which can range from bullying to other forms of abuse. We are committed to preventing abuse from occurring at all levels.

Is it abuse - or just a different culture?

Just like the larger society, our Center is becoming more culturally and ethnically diverse. There may be cultures, values, or customs within a community or family that vary greatly. Some practices may just be different; they may seem unusual, but not abusive. For example, there may be family rules about independence, obedience, or eye contact.

However, no matter how different a family’s beliefs are, the definition of abuse is not flexible. If a cultural practice seems to fall within the legal definition of abuse, it may be abuse and should be reported.

A to Z Youth Center Child Abuse Prevention Policy

The Child Abuse Prevention Policy has been established to protect the youth in our care from incidences of abuse. The purpose of this policy is to empower Center staff members and volunteers to prevent, recognize, and react responsibly about all forms of child abuse. A to Z Youth Center's programs take place in safe, nurturing environments that foster healthy relationship building between adults and youth and between youth and youth. All youth and their parents or caregivers, including Center staff members and volunteers, must be confident that such a positive environment exists.

The Child Abuse Prevention Policy includes procedures that ensure effective screening and selection of all employees and volunteers. In order to prevent child abuse from taking place, the policy presents guidelines for interactions between individuals at the A to Z Youth Center at all sponsored activities as well as off-program hours. The policy identifies concrete methods to ensure safe environments and offers training in prevention strategies. A curriculum-based training is required for staff, volunteers, and all others involved in the caretaking of youth served by the Center. The policy provides instruction on monitoring the behavior of the youth, staff, and volunteers. Additionally, written directives are provided for responding to inappropriate behavior, breaches in policy, and allegations and suspicions of child abuse if they should occur. This policy includes reporting child abuse that may be occurring outside of the Center environment if it is witnessed or reported by a child.

1. Screening and Selecting A to Z Youth Center Staff and Volunteers

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

Written Application (for employment and volunteer positions)

The written application includes the name, address, phone number, social security number, birth date, prior experience working with minors, educational background, and five year residential history of the applicant. No individual within five years of age of the youth being served can work or volunteer without ongoing adult supervision. If the applicant does not fulfill this requirement but is 18 years or older, he or she is allowed to work with the youth under direct adult supervision.

Professional Reference Checks

The applicant must sign a liability release that includes permission for the Center to conduct reference checks. The applicant must sign a confidentiality clause stating that he or she will not have access to any information provided by a referent. Reference information is strictly confidential and Center staff will take appropriate measures to ensure that the information is not accessible to unauthorized individuals. The A to Z Youth Center requires that references come from a variety of objective sources, and therefore excludes close friends and family members.

- Professional reference procedures include documentation of information:
 - Obtain verbal, not just written, references for applicants. Conversations often provide more information and allow an opportunity for follow-up questions.

- Match references with employment and volunteer history. Is anything missing? Make certain that references come from a variety of sources. Always check former states where applicants may have been employed.
- If a former employer will provide only basic information such as dates of employment, 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 which may include his or her children?
 - Would you want this person to be involved in your organization (again)?

Criminal Background Checks

Permission must be obtained from applicants before completing the criminal background check. The Center has developed a BACKGROUND INFORMATION DISCLOSURE to be completed by all applicants being considered for employment. Online responses give immediate information to the Human Resources Coordinator regarding the criminal background of applicants. No applicant or volunteer may be permitted to work with youth until this process has been completed. If an applicant or volunteer has work experience in another state, the HR Coordinator will secure information from the appropriate state entities before the individual may begin to work or volunteer.

The A to Z Youth Center, with the guidance of an attorney, has developed an indemnification clause to help protect the Center against false allegations or other legal issues. The Center also maintains professional liability insurance covering the actions of all employees and volunteers.

Criminal background checks typically include name, social security number, and are conducted at the county and state level unless extra measures are necessary. Internet searches will be carefully conducted due to the possibility of more than one person sharing the same name. The Center will keep results of criminal background checks confidential. As with all personnel records for staff and volunteers, background checks are maintained in the Human Resources Office in a locked cabinet with access by the HR Coordinator and Center administrators.

CAUTION: Because many cases of abuse, especially sexual abuse, go unreported and offenders are not identified, the criminal background check is not always fully accurate. The initial check may not identify offenders and ultimately give a false sense of security. Extra screening measures may be necessary with ongoing monitoring of all personnel recommended.

In-person Interview

The A to Z Youth Center staff interviewer is encouraged to ask follow-up questions from previous steps in the screening and selection process including the applicant's written application. Interview questions may address the applicant's experience working with youth, his or her reasons

for wanting to work with youth, his or her beliefs about disciplinary techniques, and his or her interpersonal relationships.

Job applicants and volunteers are to be informed about the Center's abuse prevention policy and procedures. Applicants and volunteers are informed that after the required orientation, they will be required to sign a document verifying that they have received and read the Center's Employee and Volunteer Handbook (which includes these Policies and Procedures). They also will indicate by signature that they completed the training and agree to abide by the policies and procedures set forth.

The A to Z Youth Center maintains records of applicants who are disqualified during the screening process or those employees or volunteers who are dismissed because of an offense. This assists in the screening of future applicants. Records are recorded in a Microsoft Excel spreadsheet which is kept in the HR Coordinator's password-protected file.

2. Guidelines on Interactions Between Individuals

Goal: to ensure the safety of youth in their interactions with A to Z Youth Center staff or volunteers and with each other.

A to Z Youth Center provides a nurturing environment by supporting positive youth development, helping youth to feel valued, and providing the caring connections that serve as protective factors for youth. Guidelines are provided to ensure positive and appropriate interactions among youth and between staff and volunteers. In promoting and ensuring such positive interactions, the Center identifies behaviors that fall into the categories of appropriate, inappropriate and harmful.

- **Verbal Communication**

- Appropriate: praise; positive reinforcement for good work or behavior.
- Inappropriate/harmful: sexually provocative or degrading comments or put downs; risqué jokes; or use of obscene language.

- **Physical Behavior**

- Appropriate: pats on the back or shoulder or high fives. Note that the use of any physical contact should be used with discretion.
- Inappropriate/harmful: patting the buttocks; intimate/romantic/sexual contact; corporal punishment (involving physical contact or inflicting pain or discomfort); or involving youth in any pornographic activities.

- **Additional Interaction Guidelines**

- The Center promotes activities that help youth develop socially, emotionally, and cognitively. These written policies and procedures will assist all staff members and volunteers to respond to actions or allegations of abuse. Staff and volunteers are trained in these directives.
- The youth must also be clearly instructed on how to promote positive interactions and what constitutes inappropriate or harmful interactions.

- The A to Z Youth Center requires that, whenever possible, more than one adult is present with one or more youth. The policy discourages one-on-one interactions.
- In the event that one of the two adults temporarily leaves a room in which there are youth, the door must be fully open and, when possible, an extra floater adult will be made available. Appropriate choices would be the Administrative Assistant, HR Coordinator, or another youth worker.
- Similarly, the Center requires that two (or more) youth will not be left without adult supervision. This helps to reduce the risk of unsupervised youth emotionally (bullying), physically, or sexually abusing other youth.
- The Center incorporates a buddy system to help prevent isolation of youth with staff or volunteers. Additionally, this system is monitored by Center staff to prevent youth-on-youth abuse.
- As with all Center programming, adults (including staff, volunteers, and parents) are encouraged to drop in unannounced. The unscheduled visits are known to help safeguard youth from all types of inappropriate situations.

3. Ensuring Safe Environments

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

- The A to Z Youth Center encourages staff and volunteers to engage in ongoing, active interaction with youth. This ensures a higher level of youth supervision and monitoring. The Center conducts periodic, unscheduled observation of these interactions as a quality control measure. When warranted, unusual, or questionable behaviors occur, there will be a review which will be recorded in the Center's personnel files (HR Ofc).
- The Center evaluates the level of risk by considering the location and time of day of each activity. Whenever possible, activities and programs will take place in open, visible, and well-lit buildings and outside areas in which multiple people can view activities. The A to Z Youth Center employs a no closed doors policy or requires windows in the doors to promote such visibility.
- On-going, year-round academic (homework) assistance is offered. All academic assistance will be conducted onsite at the Center unless authorized by the Center's Program Director. Off-site meetings, even those held in public areas, are discouraged to avoid at-risk situations.
- A to Z Youth Center provides academic tutoring. Center computers are kept in an open lab area. Staff and volunteers will closely monitor youth's use of the Internet. As a minimum, youth will be:
 - instructed on not sharing personal information with strangers, posting on websites, and cautioned about the use of social networking
 - required to advise Center staff or volunteer if he or she receives sexual emails or other online messages

- required to sign an agreement that they will comply with all Internet safety guidelines established by the Center.
- Privacy is essential when youth, employees, and volunteers are toileting, showering, and changing clothes, unless youth require special supervision for such activities.
- In the case of an organized athletic activity or fieldtrip, two or more adults will be required for chaperoning youth. Ideally, the ratio of adult to youth will be at least 1:8, based on the activity, ages of youth, and the level of risk.
- If the class or program is in an isolated location, designated solely for the staff, volunteers, and youth of the Center, ascertain that individuals from outside the program are excluded or monitored.
- When sharing space with individuals from outside the Center's program, staff will request, when possible, a sign-in/out procedure and ongoing monitoring for outside individuals. The same adult-youth ratios apply when sharing space.
- Transportation policies and procedures limit one-on-one situations. Specific directives for transporting youth to and from regular activities and special events are provided in the A to Z Youth Center Employee and Volunteer Handbook.

Critical Strategies for Ensuring Safe Environments

The A to Z Youth Center ensures safety through enhanced visibility of spaces that are open and visible to multiple people, along with the assurance of privacy, when appropriate. Strategies employed to provide youth a safe environment:

- Center is landscaped to ensure open, visible spaces with no concealment.
- Areas not used for programming are secured to prevent youth from being isolated.
- All doors in youth program areas have windows.
- Center has an absolute "no closed doors" policy.
- Bright lighting is available in all areas.
- Privacy is provided for toileting, showering, and changing clothes to reduce risk.
- Off-site adult supervision is enforced with an assigned staff coordinator.
- Staff will establish access control for admitting and releasing youth.

4. Monitoring Behavior

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

The A to Z Youth Center uses formal and informal supervision to observe, monitor, and document staff and volunteer interactions with youth. For such supervision and documentation to take place, staff and volunteers are made aware of their defined roles and responsibilities. Staff and volunteers will follow the Center's protocol in promptly responding to and reporting of inappropriate or harmful behavior, potential risk situations, and boundary violations. Further directives are provided in the training section.

5. Responding to Inappropriate Behavior, Breaches in Policy, and Allegations and Suspicions of Child Abuse

Goal: to respond quickly and appropriately to inappropriate or harmful behavior, infractions of child abuse prevention policies and procedures, and evidence or allegations of child abuse.

A to Z Youth Center staff and volunteers are required to know the policies and procedures for reporting suspected abuse, including to whom and in what format reports are made. This is covered in the required orientation for new employees and volunteers and is provided annually for ongoing employees and volunteers. A 90-minute Mandated Reporting workshop is offered quarterly or more often when needed.

According to Wisconsin state law, professionals that work with children, including Center staff and volunteers, are mandated reporters of child abuse and neglect. Refer to: <http://www.childwelfare.gov/systemwide/law-policies>.

- A to Z Youth Center staff and volunteers must know the inappropriate/harmful behaviors that require internal response. Examples of verbal communication and physical behavior are presented in this document in the ***Guidelines on Interactions Between Individuals*** section.
- Inappropriate/harmful behaviors, regardless of the severity, must be reported on an ***Incident Report*** form by the staff or volunteer who first learn of the abuse. The staff member or volunteer will not investigate allegations or conduct their own investigations. The Incident Report must include the nature and extent of the abuse, the alleged perpetrator, and other relevant information. The A to Z Youth Center Incident Report typically includes:
 1. name, age, and address of the child
 2. names and addresses of alleged abuser, parents and other caregivers
 3. specific allegations, description of the injuries
 4. witnesses and contact information
 5. abuser's current access to the child
 6. condition of the child (is the child alone or in need of medical treatment?)
 7. description of alleged abuse provided by adult and child
 8. abuser's current mental, emotional or physical state
 9. location of the child
 10. concerns about the child's location (for example, are there weapons or dangerous animals?)
 11. actions already taken by you or other professionals
 12. your name - while you will generally remain anonymous, it is helpful if the caseworker has a way to contact you for additional information
- Staff or volunteer reporting the initial allegation will submit the Incident Report form to the Center's Program Director prior to reporting to authorities. Center guidelines require the reporting staff or volunteer contact their supervisor within 24 hours. If the situation appears to be an emergency (imminent danger to the child) and a supervisor cannot be reached, immediately contact the Bureau of Milwaukee Child Welfare and the police department.

- The Incident Report and related documentation will be kept confidential and maintained in the Center’s locked personnel cabinet with limited access.
- The A to Z Youth Center recognizes that child abuse is a crime. If an allegation appears justified, a formal report will be completed by the Center’s Program Director, who is professionally and legally accountable for ensuring that all cases of abuse are reported to the proper authorities.
- Prior to submitting the report of suspicion or allegation to authorities, the Program Director may ask for clarification using open-ended questions such as “*Are you comfortable telling me what happened?*” Center staff and volunteers are requested to minimize contaminating the child’s memory and have the investigation conducted by a trained professional. Always support the child and reassure that it is not the youth’s fault and that the Center’s job is to protect youth.
- A direct-line is required to help expedite the process and minimize the number of times a youth has to repeat allegations. The Program Director will write a summary and submit a copy to the A to Z Youth Center’s Director. This copy will be maintained in the locked personnel file cabinet.
- Specifically, the formal report will be made to authorities of the appropriate outside agency. The A to Z Youth Center reports:
 - All child abuse cases to the:
Bureau of Milwaukee Child Welfare - 414/220-7233
 - In addition, sexual assault cases to the:
Milwaukee County Police Department - 414/935-7405
 - In the case of a child abuse or sexual assault emergency - **911**

CONFIDENTIALITY is crucial in cases of child abuse. The A to Z Youth Center’s confidentiality policy is consistent with state legal requirements which includes withholding the names of potential victims, the accused perpetrator, the individual who made the report to authorities, and reporting the case only on a need to know basis to the appropriate individuals.

Responses to Cases of Child of Abuse

- An allegation does not equate to guilt. However, the A to Z Youth Center must take steps to protect the youth in its care. Immediately after the report of the case to external authorities, if the alleged offender is an employee, he/she will be placed on suspension until the case is resolved legally. The A to Z Youth Center holds an appeal process in which individuals found not guilty of abusive behaviors may apply to return to their former program.
- The A to Z Youth Center, when appropriate, provides referrals for victims and their families to child abuse organizations, therapists or support groups.

- National resources include:
 - Prevent Child Abuse America, 1-312-663-3520, www.preventchildabuse.org
 - Childhelp USA® National Child Abuse Hotline, 1-800-422-4453, www.childhelpusa.org
 - U.S. Department of Health & Human Services, 1-800-394-3366, <http://nccanch.acf.hhs.gov>
- The Center also offers referrals for agencies that deal with a restorative justice approach. Southeastern Wisconsin centers include:
 - Wisconsin Community Services, Inc. at 414-290-0400
 - Marquette University Law School at 414-288-7090
 - Community Conferencing Program at 414-278-4644

6. Training for Child Abuse Prevention

Goal: to provide program staff and volunteers with information and skills to help them prevent and respond to child abuse.

The A to Z Youth Center's child abuse prevention training includes education on rights and responsibilities of staff, volunteers, and youth. Certified instructors provide specific guidelines and offer opportunities to problem-solve potentially risky situations. The objective is to equip adults and youth with the knowledge and skills to be proactive. The Center strives to create a safe, healthy, and respectful environment. Accordingly, trainees are required to follow the child abuse prevention policies and procedures in order to safeguard the children and youth in our care.

Training is conducted in Latham Hall, by either the Program Director or the Coordinator of Youth Services. Training is conducted in an interactive approach, in which trainees are encouraged to ask questions and request clarifications relevant to the training materials or their experiences. In addition to the initial formal training session, questions or concerns can be raised at the bi-monthly staff meetings or as they occur. All staff and volunteers will participate in a 2-1/2 hour *Awareness to Action, Stewards of Children*, training session.

Summary of Training Content for Staff and Volunteers

As caretakers and protectors of youth at the A to Z Youth Center, staff and volunteers will participate in child abuse prevention training. Training includes:

- Definitions of child abuse and neglect, and a continuum of appropriate, inappropriate and harmful behaviors
- A description of risk and protective factors
- Rules for personal conduct, dealing with risky or compromising situations, and the responsibility of staff and volunteers to act when they learn about inappropriate or harmful behavior
- Education on the healthy development of youth, and the responsibility of all staff and caregivers to support healthy development
- Developing a balance between providing a nurturing environment and maintaining policies and procedures to prevent child abuse
- Specific information about child sexual abuse, making clear that the majority of cases of sexual abuse involve an abuser with whom the child is familiar, such as a previously well-trusted caregiver

- Handling disclosures of inappropriate/harmful behaviors, reporting child abuse allegations, and dealing with the alleged perpetrator

Training Parents, Guardians, and Caregivers

The A to Z Youth Center encourages all parents, guardians and caregivers to participate in a free 2-1/2 hour *Awareness to Action, Stewards of Children* training which is required by all Center staff members and volunteers. For more information on this program contact the Center's Coordinator of Youth Service. Additionally, the Center provides parents and guardians a community resource list which encourages outreach for support and education, including a parent hotline, Parent Helpline 414-671-0566 and Milwaukee's IMPACT 211. The Center maintains and distributes literature and announcements detailing available parenting classes, workshops, child advocacy efforts, and community forums.

Training Youth

All youth are required to participate in wellness training to help teach appropriate behavior and protective skills. Training is offered for the age-specific developmental level and communicated in age-appropriate language. Content of the training generally includes (again, age specific) information about healthy behaviors/relationships versus inappropriate or harmful behavior/relationships. In addition, training covers the value of setting personal physical boundaries, being treated with respect, and treating others with respect, and how each person is responsible for his or her behavior. Youth are taught the importance of reporting and the procedure for reporting abuse. This includes advising youth how to seek assistance or report abuse: to a staff member or volunteer, to another youth at the Center, or to someone at an outside organization.

- Youth training materials include colorful, developmentally-appropriate workbooks which are shared with the youth's parent or caregiver. Content promotes healthy attitudes and behaviors.
- Older youth receive training adapted from the RELATE (*Relationship Education Leading Adolescents Toward Empowerment*) curriculum which concentrates on youth's rights and responsibilities and promotes healthy relationships with other youth and with adults. The trainers encourage open dialogue during the sessions and provide youth with a variety of guidelines and resources.
- The Center promotes a united front in protecting youth from abuse. Parents and caregivers are encouraged to be open and honest with their youth in general communication. Healthy family communication in a nurturing environment is a strong protective factor.

SUMMARY

Child abuse is a complex issue that can have long-term consequences. The A to Z Youth Center is privileged in the role of nurturing and caretaking of youth. In that role we strive for healthy environments for every young person in our care and beyond.

If there is a recommendation or concern that we can further address to ensure the well-being of these youth, please contact the Center's Program Director at _____ or email _____.