



**The Cathedral at
St. Paul African Methodist Episcopal Church**
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"The Mother Church of the 5th Episcopal District"

Sent Via Electronic Mail

February 10, 2023

To: The Ministers, Officers, Members, Stipend Servants, and Volunteers

From: St. Paul AME Church Board of Trustees
Rev. Dr. Spencer Lamar Booker, Chairman of the Board

Re: Sexual Misconduct Policy and Background Checks

This missive comes to remind us that we are a church that creates a safe atmosphere for all who worship, study, and fellowship at St. Paul AME Church 1260 Hamilton Avenue. St. Louis, MO, 63112.

Therefore, it is crucial that the ministers, stewards, trustees, musicians, volunteers who work with youth, and everyone who works with church funds (including organization treasurers), read the sexual misconduct policy in the Book of Discipline of the African Methodist Episcopal Church 2021. Please visit the [5th Episcopal District website](#) and press the tab entitled [Sexual Misconduct Training](#) to take the training as soon as possible. Moreover, ministers, officers and volunteers who work with youth, are requested to submit a [background check](#) which is on the 5th Episcopal District website. In addition, read the Praesidium Model and Policies on abuse provided by Selective insurance company which the Trustee Board adopted on Wednesday, February 8, 2023. (See manual below)

When you have completed the above requests, send us your signed questionnaire to the Church Office, or visit stpaulamestl.net/request-report-forms to fill out the form online. (See the form below)

Be Blessed,

Rev. Dr. Spencer Lamar Booker, Pastor

"The Church networking to meet the needs of All people through Jesus, Our Lord"
St. Matthew 28:18-20 - St. Luke 4:18-19

**ST. PAUL AFRICAN METHODIST EPISCOPAL CHURCH
SEXUAL MISCONDUCT TRAINING**

NAME: _____

1. HAVE YOU READ AND UNDERSTOOD THE PRAESIDIUM POLICIES? YES ___ NO ___
2. HAVE YOU READ THE AME CHURCH DISCIPLINE 2021 REGARDING SEXUAL MISCONDUCT? YES ___ NO ___
3. HAVE YOU COMPLETED THE AME CHURCH SEXUAL TRAINING? DATE: _____ YES ___ NO ___
4. HAVE YOU COMPLETED A CRIMINAL BACKGROUND CHECK? DATE: _____ YES ___ NO ___ N/A ___

This is to verify that I have received, read and voluntarily agreed to comply with St. Paul's policy as outlined.

Print Name

Signature

Date

PRAESIDIUM

PREVENTING ABUSE TOGETHER

WHO IS PRAESIDIUM?

Praesidium is a mission driven risk management firm that helps organizations reduce the risk of sexual abuse as well as the risk of false allegations. With over 25 years of experience and serving thousands of clients in the United States and 11 other countries, our dedicated team of researchers, psychologists, attorneys, social workers, and human resource professionals have analyzed thousands of cases of abuse in organizations and synthesized the latest scientific research.

We know how abuse happens in organizations... and more importantly, how to prevent it.

PRAESIDIUM'S MISSION: TO HELP YOU PROTECT THOSE IN YOUR CARE FROM ABUSE AND TO HELP PRESERVE TRUST IN YOUR ORGANIZATION.

Selective Insurance has partnered with Praesidium to provide policy holders access to targeted solutions to help your organization strengthen its abuse prevention efforts.

Selective Insureds can receive Praesidium's Model Policies, the Praesidium Screening and Selection Toolkit, and discounted Background Screening.

PRAESIDIUM'S SCIENTIFIC METHODOLOGY

Using current research and root cause analysis, Praesidium developed its own abuse risk management model, The Praesidium Safety Equation.® Root-cause analysis of several thousand incidents of abuse across industries demonstrated that risks fell into eight organizational operations: Policies, Screening and Selection, Training, Monitoring and Supervision, Internal Feedback Systems, Consumer Participation, Responding, and Administrative Practices. By implementing best practices in each of these operations, Praesidium determined that risks could be reduced or eliminated.

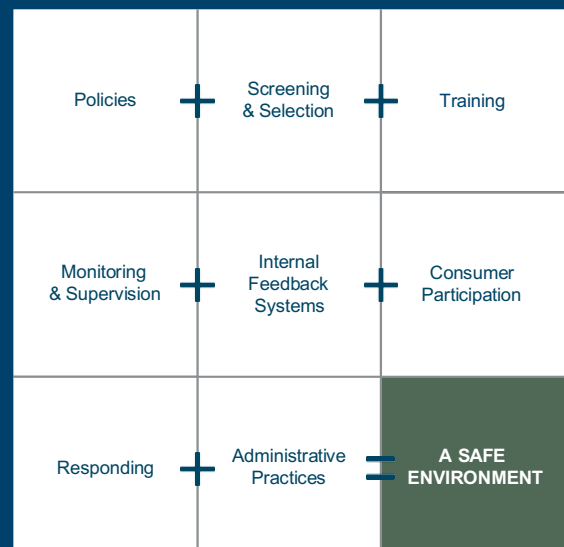


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INDEMNITY STATEMENT

Praesidium provides sample policies to assist in the prevention of organizational abuse. However, it must be noted that no system can guarantee prevention of abuse. This information is not legal advice, either expressed or implied. Consultation with qualified legal counsel is recommended.

When all policies are implemented and maintained, a risk for abuse continues to exist, as the problem of abuse is pervasive and no system to date can assure complete safety.

Accordingly, PRAESIDIUM MAKES NO WARRANTIES, EXPRESS OR IMPLIED, INCLUDING WARRANTIES OF FITNESS FOR A PARTICULAR PURPOSE AND MERCHANTABILITY, REGARDING THE SUCCESS OR FAILURE OF THE PRAESIDIUM POLICIES IN PREVENTING OR REDUCING THE INCIDENCE OF ABUSE.

ADDITIONAL DISCLAIMER

Selective Insurance has partnered with Praesidium to provide policyholders with access to Praesidium's Risk Management Resources, including Model Policies, Screening and Selection Toolkit, and discounted Background Screening (individually and collectively, "Products"). **Praesidium is not Selective's agent. Selective does not mandate use of Praesidium's Products and assumes no liability. Use of Praesidium's Products is entirely at each policyholder's discretion.**

I. General Definitions

A. Types of abuse

1. Physical abuse is injury that is intentionally inflicted upon a consumer.
2. Sexual abuse is any contact of a sexual nature that occurs between a consumer and an adult or between two consumers. This includes any activity which is meant to arouse or gratify the sexual desires of the adult or the other consumer.
3. Emotional abuse is mental or emotional injury to a consumer that results in an observable and material impairment in the consumer's growth, development, or psychological functioning.
4. Neglect is the failure to provide for a consumer's basic needs or the failure to protect a consumer from harm.

II. Code of Conduct with Consumers

The following policies are intended to assist employees and volunteers in making decisions about interactions with consumers. For clarification of any guideline, or to inquire about behaviors not addressed here, contact your supervisor.

Our organization provides our consumers with the highest quality services available. We are committed to creating an environment for consumers that is safe, nurturing, empowering, and that promotes growth and success.

No form of abuse will be tolerated and confirmed abuse will result in immediate dismissal from our organization. All reports of suspicious or inappropriate behavior with consumers or allegation of abuse will be taken seriously. Our organization will fully cooperate with authorities if allegations of abuse are made that require investigation.

The Conduct with Consumer outlines specific expectations of the employees and volunteers as we strive to accomplish our mission together.

1. Consumers will be treated with respect at all times.
2. Consumers will be treated fairly regardless of race, sex, sexual orientation, gender identification, age, or religion.
3. Employees and volunteers will adhere to uniform standards of displaying affection as outlined by our organization.
4. Employees and volunteers will avoid affection with consumers that cannot be observed by others.
5. Employees and volunteers will adhere to uniform standards of appropriate and inappropriate verbal interactions as outlined by our organization.
6. Employees and volunteers will not stare at or comment on consumers' bodies.
7. Employees and volunteers will not date or become romantically involved with consumers.
8. Employees and volunteers will not use or be under the influence of alcohol or illegal drugs in the presence of consumers.
9. Employees and volunteers will not have sexually oriented materials, including printed or online pornography, on our organization's property.
10. Employees and volunteers will not have secrets with consumers and will only give gifts with prior permission.
11. Employees and volunteers will comply with our organization's policies regarding interactions with consumers outside of our programs.

12. Employees and volunteers will not engage in inappropriate electronic communication with consumers.
13. Employees and volunteers are prohibited from working one-on-one with consumers in a private setting. Employees and volunteers will use common areas when working with individual consumers.
14. Employees and volunteers will not abuse consumers in anyway including (but not limited to) the following:

Physical abuse: hitting, spanking, shaking, slapping, unnecessary restraints

Verbal abuse: degrading, threatening, cursing

Sexual abuse: inappropriate touching, exposing oneself, sexually oriented conversations

Mental abuse: shaming, humiliation, cruelty

Neglect: withholding food, water, shelter

15. Our organization will not tolerate the mistreatment or abuse of one consumer by another consumer. In addition, our organization will not tolerate any behavior that is classified under the definition of bullying, and to the extent that such actions are disruptive, we will take steps needed to eliminate such behavior.

Bullying is aggressive behavior that is intentional, is repeated over time, and involves an imbalance of power or strength. Bullying can take on various forms, including:

- a. *Physical bullying* – when one person engages in physical force against another person, such as by hitting, punching, pushing, kicking, pinching, or restraining another.
- b. *Verbal bullying* – when someone uses their words to hurt another, such as by belittling or calling another hurtful names.
- c. *Nonverbal or relational bullying* – when one person manipulates a relationship or desired relationship to harm another person. This includes social exclusion, friendship manipulation, or gossip. This type of bullying also includes intimidating another person by using gestures.
- d. *Cyberbullying* – the intentional and overt act of aggression toward another person by way of any technological tool, such as email, instant messages, text messages, digital pictures or images, or website postings (including blogs). Cyberbullying can involve:
 - Sending mean, vulgar, or threatening messages or images.
 - Posting sensitive, private information about another person.
 - Pretending to be someone else in order to make that person look bad.
 - Intentionally excluding someone from an online group.
 - Hazing – an activity expected of someone joining or participating in a group that humiliates, degrades, abuses, or endangers that person regardless of that person’s willingness to participate.
 - Sexualized bullying – when bullying involves behaviors that are sexual in nature. Examples of sexualized bullying behaviors include sexting, bullying that involves exposures of private body parts, and verbal bullying involving sexualized language or innuendos.

Anyone who sees an act of bullying, and who then encourages it, is engaging in bullying. This policy applies to all consumers, employees and volunteers.

16. All employees must follow state specific mandatory reporting requirements. Employees should be trained to be aware of and understand their legal and ethical obligation to recognize and report suspicions of mistreatment and abuse. Employees will:
- a. Be familiar with the symptoms of child abuse and neglect, including physical, sexual, verbal, and emotional abuse.
 - b. Know and follow organization policies and procedures that protect consumers against abuse.

- c. Report suspected child abuse or neglect to the appropriate authorities as required by state mandated reporter laws.
 - d. Follow up to ensure that appropriate action has been taken.
- 17. Employees and volunteers will report concerns or complaints about other employees, volunteers, adults, or consumers to our organization's supervisor.
- 18. Our organization cooperates fully with the authorities to investigate all cases of alleged abuse. Any employees or volunteer shall cooperate to the fullest extent possible in any external investigation by outside authorities or internal investigation conducted by the organization or persons given investigative authority by the organization. Failure to cooperate fully may be grounds for termination.
- 19. Employees and volunteers may not have engaged in or been accused or convicted of consumer abuse, indecency with a consumer, or injury to a consumer.

A. Sample Policy Prohibiting the Abuse or Mistreatment of Consumers

This organization has **zero tolerance** for abuse and will not tolerate the mistreatment or abuse of consumers in its programs. Any mistreatment or abuse by an employee or volunteer will result in disciplinary action, up to and including termination of employment or volunteer service and cooperation with law enforcement.

B. Sample Policy Prohibiting the Abuse or Mistreatment of One Consumer by Another Consumer

The organization has **zero tolerance** for abuse, mistreatment, or sexual activity among consumers within the organization. This organization is committed to providing all consumers with a safe environment and will not tolerate the mistreatment or abuse of one consumer by another consumer. Conduct by consumers that rises to the level of abuse, mistreatment, or sexual activity will result in intervention or disciplinary action, up to and including, dismissal from the program.

In addition, our organization will not tolerate any behavior that is classified under the definition of bullying, and to the extent that such actions are disruptive, the organization will take the necessary steps to eliminate such behavior.

III. Policies

Policies define the bandwidth of acceptable behavior in an organization. Because offenders often violate policies to gain access to consumers, when employees know and understand policies, they can identify, interrupt, and report policy violations. Simply interrupting a policy violation can prevent a false allegation of abuse or put an offender on notice that no one works in private, the rules apply to everyone, and violations will be detected.

A. Physical Contact

Our organization’s physical contact policy promotes a positive, nurturing environment while protecting consumers, employees and volunteers. Our organization encourages appropriate physical contact with consumers and prohibits inappropriate displays of physical contact. Any inappropriate physical contact by employees or volunteers towards consumers in the organization’s programs will result in disciplinary action, up to and including termination of employment.

The organization’s policies for appropriate and inappropriate physical interactions include but are not limited to:

| <i>Appropriate Physical Interactions</i> | <i>Inappropriate Physical Interactions</i> |
|---|---|
| <p>Contact initiated by the consumer such as:</p> <ul style="list-style-type: none"> • Side hugs • Shoulder-to-shoulder or “temple” hugs • Pats on the shoulder or back • Handshakes • High-fives and hand slapping • Pats on the head when culturally appropriate • Touching hands, shoulders, and arms • Arms around shoulders • Holding hands (with young children in escorting situations) | <ul style="list-style-type: none"> • Full-frontal hugs • Kisses • Showing affection in isolated areas or while one-on-one • Lap sitting • Piggyback rides, wrestling • Tickling • Allowing a consumers to cling to an employee’s or volunteer’s leg • Allowing consumers, older than kindergarten, to sit on an employee or volunteer’s lap • Any type of massage given by or to a consumer outside of accepted and documented medical treatment • Any form of affection that is unwanted by the consumer or the employee or volunteer • Touching bottom, chest, or genital areas that is outside authorized and documented personal care assistance |

B. Verbal Interactions

Employees and volunteers are prohibited from speaking to consumers in a way that is, or could be construed by any observer, as harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning, or humiliating. Employees and volunteers must not initiate sexually oriented conversations with consumers. Employees and volunteers are not permitted to discuss their own sexual activities with consumers.

Our organization’s policies for appropriate and inappropriate verbal interactions are:

| <i>Appropriate Verbal Interactions</i> | <i>Inappropriate Verbal Interactions</i> |
|--|---|
| <ul style="list-style-type: none"> • Positive reinforcement • Appropriate jokes • Encouragement • Praise | <ul style="list-style-type: none"> • Name-calling • Discussing sexual encounters or in any way involving consumers in the personal problems or issues of employees and volunteers • Secrets • Cursing • Off-color or sexual jokes • Shaming • Belittling • Derogatory remarks • Harsh language that may frighten, threaten or humiliate consumers • Derogatory remarks about the consumer or his/her family |

C. One-on-One Interactions

Most abuse occurs when an adult is alone with a consumer. Our organization aims to eliminate or reduce these situations and prohibits private one-on-one interactions unless approved in advance by the organization administration.

In those situations where one-on-one interactions are approved, employees and volunteers should observe the following additional guidelines to manage the risk of abuse or false allegations of abuse:

Additional Guidelines for One-on-One Interactions

- When meeting one-on-one with a consumer, always do so in a public place where you are in full view of others.
- Avoid physical affection that can be misinterpreted. Limit affection to pats on the shoulder, high-fives, and handshakes.
- If meeting in a room or office, leave the door open or move to an area that can be easily observed by others passing by.
- Inform other employees and volunteers that you are alone with a consumer and ask them to randomly drop in.
- Document and immediately report any unusual incidents, including disclosures of abuse or maltreatment, behavior problems and how they were handled, injuries, or any interactions that might be misinterpreted.

D. Off-Site Contact

Research shows many cases of organizational abuse occur off-site and outside of regularly scheduled activities. Allowing contact outside of regularly scheduled activities may put employees, volunteers, consumers, and our organization at increased risk. This document offers various options for managing the risk of abuse and false accusations arising from contact outside the organization's regularly scheduled programming.

Examples of contact outside of regularly scheduled program activities:

- Babysitting arrangements
- Tutoring
- Private lessons/coaching
- Mentorship
- Social interactions between employee's or volunteer's children and children served by the organization:
 - Playdates and birthday parties
 - Sleepovers
 - Overnight trips and vacations
 - Rides to/from organization or extracurricular activities and events
- Attending public events in a shared community (like graduation, sports events, religious ceremonies)
- Continued contact with consumer after a consumer's participation in a program has ended

[The organization will need to define in written policy whether and to what extent they will allow outside contact and define parameters for managing those interactions using the criteria below].

1. Option One:

This organization prohibits interactions between employees and volunteers with consumers outside of regularly scheduled program activities.

2. Option Two:

This organization strongly encourages employees and volunteers to refrain from outside contact with consumers. However, if interactions with consumers outside of regularly scheduled program activities are part of programming or otherwise unavoidable, this organization offers the following guidelines:

- Define whether and to what extent certain types of outside contact with consumers is permissible and create written parameters for managing these interactions
- Require forms of documentation of these outside contact interactions, such as:
 - Written parent/guardian approval (particularly for consumers that are minors - consider requiring the parent/guardian to sign a release-of-liability statement)
 - Supervisor/administrator notification or awareness
 - A defined purpose or rationale for that outside contact
 - A schedule of the interaction including times of engagement, consumer(s) involved, and location of event/activity
 - If anything unusual occurred that could be misinterpreted as inappropriate behavior
- Define the acceptable level of contact after consumer participation in programming has ended and communicate those expectations to employees, volunteers, consumers, and parents/guardians. As examples:
 - Only the consumer can initiate sustained communication or contact with employees or volunteers after they leave or end their program participation, and preferably through organization-approved means of communication (i.e., organization email address or business phone line)
 - Consumer and parent/guardian must understand the contact is not affiliated with or represented by the employee or volunteer's professional role within the organization
- Consider other organizational policies governing interactions between employees, volunteers, and consumers (like physical contact, verbal interactions, electronic communications, managing one-on-one interactions)

3. Option Three:

This organization strongly encourages employees and volunteers to refrain from outside contact with consumers with which they do not have a preexisting familial or social relationship (i.e., children are friends at school, families attend same religious institution). However, if interactions with consumers outside of regularly scheduled program activities are part of programming or otherwise unavoidable, this organization offers the following guidelines:

- If there is a pre-existing social or familial relationship, ensure proper boundaries are drawn by the employee or volunteer while in organization programming. For example, if Emily Employee is best friends with Consumer Charlie's mom such that Consumer Charlie calls Emily by her first name in social settings, ensure Emily communicates to Consumer Charlie that while in organization programming Consumer Charlie needs to call Emily, Ms. Employee. This helps reinforce the boundary and makes clear that Emily's role as an employee or volunteer is different than her role as Consumer Charlie's mom's best friend and the relationship should reflect that. If Emily has children that are friends with Consumer Charlie, she can give Consumer Charlie a ride if her children are also in the car. Even in that interaction, make sure Consumer Charlie is sitting in the back seat. The same rules apply for trips to McDonald's/the park/etc. that are occurring as part of the preexisting social relationship.
- To increase transparency, consider texting or emailing an administrator when these interactions like transportation and social outings occur. If Emily allows other young consumers to spend the night with her children, ensure administrators are notified to increase transparency and consider keeping the number of consumers at the gathering small (1-3). Ensure that rules prohibiting one-on-one interactions apply in this setting and that consumers are not going into Emily's bedroom or vice versa. If consumers are going to join Emily and her children on a vacation or other trip, make sure the Rule of Three applies so there are no one-on-one interactions. Consider requiring Emily to get some sort of written confirmation from the consumer's parents that they have allowed their child to go (can be as simple as a text).
- Consider utilizing a preexisting relationship form (i.e. if someone has a familial or social relationship with a consumer or will be hiring them to babysit/housesit/tutor/etc.) have them notify the organization ahead of time. This helps ensure transparency and also protects the employee or volunteer from rumors. For example, if Coach Jones has hired Morgan to babysit and someone sees Morgan leaving Coach Jones' house at 10pm on a Friday night, it is much easier for the employee or volunteer and organizational leadership to respond to those concerns if they have been notified that interaction was going to take place. It is not a foolproof system, as abuse can certainly still happen in the situation given, but it adds an extra layer of protection for employees, volunteers, and consumers.

E. Electronic Communication

[The terms “electronic communications” and “social media” or “social network” refer to activities that integrate technology, telecommunications, and social interaction through the use of words, images, video or audio tools. Examples include, but are not limited to: social websites, blogs, message boards, wikis, podcasts, image- and video-sharing sites, text and voice chat platforms for gaming, live webcasting, and real-time web communities. Additionally, sending text messages between two or more mobile phones or fixed or portable devices over a phone or wireless network is included within these definitions.]

[The organization will need to define in written policy whether and to what extent they will allow electronic communication and/or social media and define parameters for those interactions using the criteria below].

1. Option One:

This organization prohibits all electronic and social media communication directly with consumers. If your organization chooses this option, ensure employees and volunteers follow these guidelines:

- Employees and volunteers are prohibited from sending text messages to consumers and/or replying to text messages from a consumer. If a consumer attempts to communicate with an employee or volunteer via text, a supervisor must be notified immediately.
- All e-mail communications with consumers who are minors must be directed to the consumer’s parents/guardians. An organization may also designate an employee to be copied on all electronic communication with consumers. Employees and volunteers are prohibited from all other forms of electronic communications and instant messaging with consumers.
- Employees and volunteers are prohibited from communicating with consumers using social networks, including direct messaging through social media and gaming platforms.
- Personal social media accounts and blogs of employees and volunteers must be private and inaccessible to consumers. Employees and volunteers with profiles on social media sites may not request to be friends with or follow consumers or approve friend/follow requests from consumers.

2. Option Two

This organization strongly encourages employees and volunteers to refrain from electronic communication and/or social media use with consumers. However, if these interactions are part of programming or otherwise unavoidable, this organization offers the following guidelines:

- a. Require employees, volunteers, consumers, parents/guardians to sign a Social Media Code of Conduct that includes guidelines about appropriate and inappropriate communication with consumers. *[This allows parents/guardians to play a role in monitoring consumer's interactions with employees and volunteers. In addition, it teaches consumers how to interact appropriately through social media sites.]* Program administrators should review this Code of Conduct with consumers at the program orientation. At a minimum, the Code of Conduct should:
 - Prohibit comments that are, or could be construed by any observer to be, harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning, or humiliating.
 - Prohibit sexually oriented conversations or discussions about sexual activities.
 - Prohibit private messages between employees and volunteers and consumers.
 - Prohibit posting inappropriate pictures or inappropriate comments on pictures.
- b. Program administrators create a public social media page for the program. Then employees, volunteers, and consumers are instructed to communicate through this public page instead of through individual personal profiles. This approach allows the administrators to monitor communication and ensures that employees and volunteers do not have private (and possibly inappropriate) conversations with consumers.
 - The organization monitors its social media pages and removes any posts that violate the organization's policies for appropriate behavior.
- c. The organization informs parents/guardians of any such prohibited posts or online behavior.
- d. Encourage employees and volunteers to have "private" profiles so that consumers do not have access to their private information. Common settings to check are:
 - Which information on certain platforms is always available to the public (e.g. name or username, bio, profile photos, associated networks)

- Who can send the user a friend or follow request, search for them by email address or phone number, and send them direct messages?
 - Who can tag the user in photos or posts and potentially give away location or personal information?
 - Can the user prohibit search engines from linking to a their social media profile or allowing it to appear in public searches?
- e. Encourage employees and volunteers to use platforms designed for smaller groups, clubs, or team communication and which allow all communication to be seen by all consumers and/or parents and guardians (e.g., Remind, GroupMe, Slack)
- f. Keep in mind that typically social media try and limit usage to only consumers who are 13 years or older. There are very limited circumstances in which an employee or volunteer should need to electronically contact a consumer under the age of 13.
- g. Organizations are encouraged to set “office hours” outside of which employees and volunteers may not generally send or respond to electronic communications.
- h. Employees and volunteers should keep communications professional in nature and limit discussion to programmatic purposes.
- i. Train employees and volunteers on how to respond to private electronic communication from consumers. The responding procedure should include:
- Alerting a supervisor about the private communication and carefully documenting and forwarding the communication according to the organization’s guidelines. For most organizations, employees and volunteers should not respond privately to consumers except to state that such communications are prohibited by the Code of Conduct.
 - Exceptions may be made under emergency situations wherein private messages may occur in order to locate a consumer and secure his/her safety, but all such contact must be documented accordingly.
 - If a consumer reveals abuse or inappropriate interactions with an adult or child, the employee or volunteer must report this information to an supervisor and child protective services or law enforcement immediately.
- j. Some organizations allow private communications with consumers within a mentor or advocate relationship.
- Before using electronic communication or social media in this instance, employees and volunteers should evaluate whether it is

necessary for that particular consumer and consult a supervisor for approval. Using social media should be a last resort.

- Employees and volunteers should engage in electronic and social media communication only with the consumer with whom they have a professional relationship and not with the consumer's other family members.
- k. Employees and volunteers may choose or be required to include a supervisor or the organization in their direct communications with a consumer.
- l. Provide consumers and parents/guardians with information about how to respond to inappropriate communication from employees and volunteers. The responding procedure should include:
- Contact information for the program administration.
 - An anonymous method for reporting concerns.
- m. Requests to discontinue – Parents and guardians may request in writing that a consumer not be contacted through any form of electronic communication or social media by the organization

F. Sample Electronic Communication and Social Media Code of Conduct

In recent years, electronic communication and social media platforms have become increasingly popular. While these tools provide many benefits, they also present the potential for inappropriate behavior, increased access to vulnerable consumers, and privacy violations. Employees, volunteers, and consumers participating in this organization's programs, events, and activities shall adhere to the following Social Media Code of Conduct:

1. Do not engage in behavior or comments that are, or could be construed by any observer to be, harsh, abusive, coercive, threatening, intimidating, shaming, derogatory, demeaning, or humiliating.
2. Do not engage in personal attacks, sexually oriented conversations, or discussions about sexual activity.
3. Be a positive role model by exhibiting professionalism in all interactions; portray an attitude of respect, loyalty, patience, courtesy, tact, and maturity.
4. Only program-related messaging may be communicated electronically between employees and volunteers of the organization and consumers, parents, and guardians. Such communication should generally occur during standard business hours.
5. Employees and volunteers are prohibited from sending private messages to consumers and/or replying to private messages from a consumer. If a consumer attempt to privately communicate with an employee or volunteer electronically, their supervisor must be notified immediately.
6. Personal social networking profiles and/or blogs of employees and volunteers shall be private and not shared with consumers. Employees and volunteers with profiles on social networking sites shall not request to be "friends" with or follow consumers or approve friend or follow requests from consumers.
7. Employees and volunteers may not engage in electronic communication or social media contact with other family members or friends of consumers.
8. Never reveal sensitive or confidential information, including identifiable details or photos of a consumer without written consent from their parent or legal guardian.
9. Employees and volunteers may not post or share on their personal social media accounts any photographs or videos of consumers participating in the organization's programs.
10. Employees and volunteers may not post or share inappropriate photos or comments on photos of consumers.
11. Do not make pornography in any form available to consumers participating in the organization's programs, events, and activities or assist consumers in any way in gaining access to pornography.
12. Employees and volunteers may not create web pages on behalf of the organization unless they have prior approval to do so and may not misrepresent their work with the organization or the organization itself.
13. Employees and volunteers engaging in social media and online communication

become a public figure associated with the organization and are responsible to help

protect the organization and its consumers. Always act in a professional and constructive manner and use sound judgement before posting or sharing content.

14. Rather than personally defend the organization’s reputation, employees and volunteers should notify their supervisor or an administrator of a negative comment or online representation or if any member of the media contacts them about any matter related to the organization.
15. Employees and volunteers must adhere to uniform standards of electronic communication and social media use as outlined in any applicable organizational policies and procedures.
16. This Code of Conduct and associated policies and procedures shall be provided to parents/guardians of consumers. It shall also be available on the organization’s website for public view.
17. Consumers and Parents/guardians may request in writing that a consumer not be contacted through any form of electronic communication or social media by an employee or volunteer of the organization.

Acknowledgment of Electronic Communication and Social Media Code of Conduct

I have received a copy, read, and voluntarily agree to comply with this organization’s Electronic Communication and Social Media Code of Conduct. I understand that failure to comply with these policies may result in my removal from this organization.

(Please Print)

Name _____

Program or Department: _____

Signature _____ **Date** _____

Parent/Guardian Name *(if applicable)* _____

Signature _____ **Date** _____

G. Gift Giving

Molesters routinely groom consumers by giving gifts, thereby endearing themselves to the consumer. They might instruct the consumer to keep the gifts a secret, which then starts teaching the consumer to keep secrets from parents/guardians. For this reason, employees and volunteers should only give gifts to groups of consumers, and only under the following circumstances:

1. Administration must be made aware of and approve the gift.
2. Parents/guardians must be notified.

IV. Training Requirements

A. General Training Requirements

| <i>Audience</i> | <i>Content</i> | <i>Timetable</i> | <i>Delivery Method</i> |
|--|--|---|--|
| All employees and volunteers with access to consumer | Abuse Risk Management | Within 30 days of selection or prior to placement | Live Training or Armatus® Online Training* |
| All employees and high access volunteers | Prevention of consumer-to-consumer Abuse | Within 30 days of selection or prior to placement | Live Training or Armatus® Online Training |
| All employees who make hiring decisions | Screening and Selection | Prior to making hiring decisions | Live Training |
| All employees who conduct internal investigations | Incident Investigation | Prior to investigations | Live Training |
| All employees with access to consumer | Refresher Abuse Risk Management | At employment or volunteer anniversary date | Live Training or Armatus® Online Training |

*Armatus® is an online training platform offered by Praesidium. Courses include specific learning objectives, exceptional content, engaging graphics, frequent interactivity and a content mastery quiz. Armatus® Online Training is a possible delivery method for the above mentioned content areas. The following chart lists the Armatus® modules that personnel can complete in the certain situations:

| <i>Audience</i> | <i>Armatus® Modules</i> | <i>Timetable</i> |
|--|---|--|
| Employees unable to attend live training AND Employees hired after live training conducted | Meet Sam It Happened to Me Organization Policies Preventing Sexual Activity between Young Children | Within 30 days of live training or hire date |
| High Access Volunteers | Organization Policies Abuse Risk Management for Volunteers | Prior to access with consumer |
| Employees who violate policies or exhibit questionable boundaries | Organization Policies Refresher Module | Within 5 days of administrator notification |

| | | |
|--|------------------|--|
| Returning employees (who previously participated in live or Armatus® training) | Refresher Module | At employment or volunteer anniversary date. |
|--|------------------|--|

V. Monitoring and Supervision

When employees are adequately supervised, potential offenders are less likely to act on their impulses because they face detection. When consumers are adequately supervised, they too are less likely to engage in inappropriate interactions with others. Similarly, the physical plant must be monitored, particularly out-of-the-way locations or locations that might permit an offender undue access to or privacy with a consumer. Effective supervision and monitoring require that a variety of methods be used frequently, at both scheduled and random times.

A. Facility Monitoring

Building architecture can increase or mitigate the risk of an incident or accident. Because most incidents of sexual behavior occur in private, the extent to which privacy is managed, risk is managed. The organization will systematically identify facility locations that allow for unnecessary privacy or limit line of sight supervision, and will implement a formalized system to manage these identified architectural risks, which includes;

- Ensuring employees and volunteers are aware of these locations and circumstances;
- Ensuring unused rooms, offices, and closets remain locked;
- Ensuring visibility in rooms without windows; and
- Ensuring employees routinely walk through out of the way locations

Sample Facility Monitoring Checklist

Create a facility monitoring checklist for each location which identifies that location's high-risk areas. Because most incidents of sexual abuse or inappropriate behavior occurs in private, minimizing privacy in facilities is critical to managing this risk. The checklists should be readily available, easy to follow and once completed, kept in a central location accessible to administrators.

In order to ensure that all of the locations are properly and consistently monitored, designate an employee or volunteer who must complete a site inspection checklist. On a daily basis, make sure that employees and volunteers complete this checklist multiple times throughout the day, and try to vary from day to day the actual times these checklists are completed. For example, if the facility monitoring checklist is completed at 10:00 AM, 2:00 PM, and 4:00 pm on Monday, schedule Tuesday's checks to occur at 11:00 AM, 3:00 PM, and 5:00 PM.

Sample Facility Monitoring Checklist

| Name/Title | Date | Time |
|-------------|---|------|
| = | All unused rooms, offices, storage areas, and closets are locked. Stairwells are consistently monitored. | |
| <hr/> <hr/> | | |
| = | All windows permit observation into program areas and offices (i.e., artwork on windows should not prevent informal monitoring by passersby; all blinds on windows should be open). | |
| <hr/> <hr/> | | |
| = | All employees and volunteers are identifiable and dressed in the appropriate uniforms. | |
| <hr/> <hr/> | | |
| = | All program activities are within the designated ratios (insert your program ratios here). | |
| <hr/> <hr/> | | |
| = | Employees and volunteers are spread out in the activity area and actively supervising consumers in authorized areas. | |
| <hr/> <hr/> | | |

== Bathrooms

== The bathroom is clean.

== Neither consumers nor adults are just “hanging out” in the bathrooms.

== There is only as many consumers in the bathroom as there are stalls.

== All consumers remain in authorized facility areas that are easily viewed by employees and volunteers (i.e., consumers are not wandering off by themselves without employees and volunteers present to supervise them) or in structured, supervised program activities.

== Consumers are checked into and out of the facility according to policy.

== The grounds around the location are free from hazards.

Site Specific Considerations

== For after-school sites that have theaters or stages (such as in a school cafeteria), stage curtains should remain open at all times so that consumers cannot sneak behind the curtains.

- For playgrounds, employees and volunteers should be positioned around the perimeter of the playground to ensure that consumers are supervised and that they remain the assigned area. Employees and volunteers should also be stationed near playground equipment (such as tunnels and jungle gyms) that do not allow for line-of-sight supervision.

Supervisor/Manager on Duty Signature

Date

B. Checking Members into a Facility:

1. When anyone (members, guests, residents, construction workers, maintenance, cleaning crews, etc.) enters the facility during operational hours, they must check in with the front desk.
2. When possible, create a single point of entry and exit in the facility.
3. If there is more than one entrance or exit, ensure these other points of access are consistently monitored.

C. General Supervision

General supervision procedures:

1. **Administrative and Supervisory Visits to Consumer Programs-** consumer supervisors and administrators will regularly visit all consumer programs to ensure that all activities are well- managed and that consumer policies are observed by all in attendance.
2. **Ratios-** Each program will follow the ratio requirements that are directly to the goals of the program and the design of the program area. The employees or volunteer-to-consumer ratio should be adjusted for programs that serve consumers with special needs. Refer to local licensing requirements and general best practice guidelines for establishing adult-to-consumer ratios.
3. **Mixed Age Groups-** In most incidents involving one consumer abusing another consumer, the consumers are from different age groups. Each program is responsible for establishing specific guidelines for additional monitoring and supervision of activities that involve consumers from different age groups. Employees and volunteers must be aware that close line of sight supervision is required when monitoring programs that mix age groups.

D. Monitoring Consumer in Facilities

Generally, Praesidium recommends that consumers under the age of 12, or 7th grade, should not be alone in the facility without a parent or guardian present. By this age, most consumers have had the experience of being without immediate parent/guardian supervision. In addition, 12-year-old consumers are able to use self-protection skills in the event that they are approached inappropriately by another consumer or by an adult.

However, Praesidium also recognizes that many consumer serving programs (i.e. schools) must permit younger children to access the facilities for many reasons without a parent or guardian being present.

That said, because the program is responsible for all consumers in the facility, we recommend implementing the following practices:

1. Require a parent or legal guardian to complete program registration form which includes identifying information, any special medical or behavioral circumstances, any legal indemnifications, the consumer's date of birth, and emergency contact information. In addition, require all consumers to sign-in AND to sign-out of the facilities so that the program has a record of the consumer who are in the facility at all times.
2. Require consumers to sign a Code of Conduct that outlines the program's behavioral expectations and policies regarding appropriate and inappropriate interactions. This Code of Conduct should also include a systematic disciplinary policy which explains that consumers will be suspended or dismissed from the program for policy violations. Require parents/guardians to sign this Code of Conduct as well, so that they are aware of the programs polices and progressive disciplinary procedures. If the consumer is a guest of a program member, the visiting consumer must sign the Code of Conduct.
3. While Praesidium understands that a parent/guardian orientation may not be feasible in all circumstances, we recommend encouraging parents/guardians to attend an information session with a program representative. This meeting will provide an opportunity to review expectations and requirements, and the chance to establish a relationship with the parents/guardians. This can be helpful if any problems arise in the future.
4. While in the facility, consumers can be supervised directly, indirectly, or with a combination of the two techniques.
 - For direct supervision, the program may offer structured, scheduled activities like basketball tournaments, swimming activities, arts and crafts, etc. These activities should have one or more employees assigned to lead and supervise.
 - For indirect supervision, the program must designate certain building areas as authorized areas. Authorized areas could include a gymnasium, a game area, or a classroom for doing homework and so on. Authorized areas must be easily visible and routinely and systematically checked by employees. consumers should know that they will be supervised by employees at all times, and all employees should know which areas are authorized and which are not.

5. Develop supervision standards for the authorized areas. For example:
 - Determine how frequently authorized areas should be monitored by employees.
 - Assign employees specific supervision responsibilities over authorized areas.
 - Require employees to record when they monitor authorized areas: this may be accomplished by using checklists.
6. All program employees should wear nametags or identifying clothing so that the consumer can easily recognize them as employees.
7. Train all employees:
 - a. To greet consumers that enter the facility; to direct consumers to the structured activities or authorized areas; and, to redirect consumers who are not in an authorized area or who are not participating in a structured activity.
 - b. To be aware of the risks involved with mixing age groups and how to monitor activities involving mixed age groups.
 - c. To routinely monitor high risk areas (such as bathrooms, locker rooms, and unused rooms). Praesidium recommends designating specific employees to supervise these areas (i.e., Managers on Duty). These employees should document the scheduled and periodic sweeps of high risk locations.

Ultimately, all consumers must be supervised at all times, regardless of age. The key to remember is that they can be supervised directly in structured activities and indirectly when they are in authorized areas.

E. Sample Procedures for Providing Supervision for Unique Consumers

Certainly, every effort should be made to serve consumers already participating in programs. However, not all programs can meet the needs of all consumers. When the demands placed on employees and volunteers by particular consumers exceed the skills of the employees and volunteers or the scope of the program, accidents or abuse may occur. We understand each consumer is different and responds differently in certain situations. Through behavior management, we will try preventing problems, using redirection, having clear rules, which are developmentally appropriate, and giving positive reinforcement. Discipline problems may still arise; if these occur, we will be using progressive discipline.

Progressive discipline refers to increased severity if a consumer repeatedly violates rules or becomes harmful to self or other consumers. Behavior standards will be broken into three categories, Level I, Level II and Level III. Each category carries its own series of consequences. Below you will find the definition of each violation.

Level I:

Disrespectful towards employees and volunteers
Disrespectful towards other consumers
Disruptive Behaviors

Repeatedly not following direction
Repeatedly not following program/ game rules
Excessive Horseplay

Level II:

Pushing
Tripping
Hitting
Kicking
Spitting
Threatening Comments or gestures

Uncontrollable Behaviors
Inappropriate Language
Aggressive behavior towards other consumers/
employees and volunteers
Teasing or embarrassing others
Willful destruction of the program property

Level III:

Fighting
Leaving assigned area without permission
Biting
Harassment

Intimidation
Bullying
Aggressive behavior that causes serious harm to another consumer

Consumer Name: _____

| | First Violation | Second Violation | Third Violation | Fourth Violation | Fifth Violation |
|-------------------|--|--|---|--|--|
| Level I* | Verbal Notice to parent/ guardian describing the behavioral concern | Written notice to parent/ guardian describing behavioral problem | Written notice to parent describing the behavioral problem and parent/guardian conference | 1-3 days out of program suspension (tuition not prorated) | Expulsion from the program without reimbursement from the program. |
| Level II* | Verbal and written notice to the parent guardian describing behavioral problem | Written notice to the parent guardian describing the behavioral problem and parent/guardian conference | 1-3 days out of program suspension | Expulsion from the program without reimbursement from the program. | |
| Level III* | 1-3 days out of program suspension or Immediate Expulsion (tuition not prorated or reimbursed) | | | | |

*Determination of the violation is at the discretion of the supervisor. Violation determination may escalate to immediate suspension or expulsion based on severity of violation. Please discuss this behavior management policy with your consumers

Sample Questions for supervisors, employees and volunteers to ask when deciding if a program fits a consumer's unique needs:

- Can my employees and volunteers adequately supervise this particular consumer without compromising the interactions with other consumers?
- Has this consumer previously posed a threat to others?
- Have we made a solid attempt to meet this consumer's needs while ensuring the safety of others enrolled in the program?
- Does this consumer pose a risk to the safety and well-being of others?
- If supervisors and employees answer these questions and conclude the program is not the right program for a particular consumer, schedule a meeting with the consumer's parents/guardian, caseworker, etc. to discuss your conclusions. If applicable, try to locate an alternative resource for the family.

F. Monitoring High Risk Activities

1. Bathroom Activities

Most incidents of consumer-to-consumer abuse occur in the bathrooms. Therefore, the following supervision guidelines are recommended:

When supervising restroom use, adult employees members should first quickly scan the bathroom before allowing consumers to enter.

- a. For “Group Bathroom Breaks”:
 - Require employees to take groups of two or more consumers to the bathroom – following the “rule of three” or more.
 - If the bathroom only has one stall, only one consumer should enter the restroom while the others wait outside with the employees.
 - If there are multiple stalls, only send in as many consumers as there are stalls.
 - Minimize consumers of different ages using the bathroom at the same time.
 - Require employees to stand outside the bathroom door but remain within earshot.
- b. For single use restrooms:
 - Require consumers to ask permission to use the bathroom.
 - Require all employees to frequently check bathrooms.
- c. Prohibit employees from using the bathroom at the same time as consumers.
- d. If assisting young consumers in the stalls, the employees should keep the door to the stall open.

2. Sample Child Care Procedures for Diapering and Toileting

For diapering

- a. Placing the changing table in an open area where adult actions can be observed by others.
- b. Requiring that diapers only be changed when at least two adults are present.
- c. Requiring written documentation of diaper changing.
- d. Informing parents/guardians if employees notices anything out of the ordinary or concerning while changing the infant’s diaper. Requiring employees to know and follow all licensing requirements having to do with diapering.

For toileting:

- a. Require employees to stand in the doorway with the door ajar while children use the restrooms.
- b. If employees must enter the restroom to assist a child, ensure that the door to the restroom remains open.
- c. When possible, send in only one child at a time.
- d. When not possible, send in only as many children as there are stalls.

3. Locker Room Activities

The locker room procedures include:

- a. Requiring employees to stand within earshot of the locker room when in use by consumers.
- b. Requiring employees to routinely check inside the locker room so users know the locker room is monitored.
- c. Discouraging the use of locker rooms by consumers of different ages at the same time.
- d. Prohibiting the use of locker room horseplay such as towel snapping.
- e. When possible, arrange lockers to minimize unnecessary privacy.

4. Shower Activities

Employees and consumers must shower at different times. Create shower schedules that will permit supervision of the consumers while employees shower.

- a. While the consumers shower, at least one employees member should stand in the bathroom doorway and within earshot of the consumers. Ensure that only one consumer is in each shower (Consider utilizing shower curtains that do not go all the way to the floor, so that employees can easily see how many consumers are in each shower stall).

5. Transition Times and Free Times

Transition times and free-choice times (or free times) pose a high risk for incidents because during these times, employees and volunteers may not be assigned a particular group of consumers to supervise. To decrease the risk of incidents, implement the following procedures:

- a. Require consumers to remain in line-of-site of employees at all times.
- b. Specify the employees-to-consumer ratio.
- c. Specify narrow geographic boundaries in the program areas.
- d. Ensure that all employees are assigned specific areas to supervise (“zone monitoring”).
- e. Include bathroom procedures.
- f. Require periodic roll calls for each age group.
- g. Require supervisors to conduct periodic check-ins and sweeps of the entire activity area.

6. Playground Activities

The playground procedures require:

- a. consumers to remain in line-of-site of employees at all times.
- b. Definition of specific and narrow geographic boundaries around the playground area.
- c. Specific instructions on how to monitor barriers of supervision (such as storage sheds, playhouses, tunnels, and shrubs).
- d. That all employees are assigned specific areas to supervise (“zone monitoring”).
- e. Specific bathroom procedures.
- f. Employees to conduct periodic roll calls for each age group.
- g. Supervisors to conduct periodic check-ins and assessments of the activity period and of the entire activity area.

7. Transportation Activities

Transporting consumers may increase the risk of abuse or false allegations of abuse because employees and volunteers may be alone with a consumer or may make unauthorized stops with consumers. In addition, transportation activities may provide a time for unsupervised consumers to engage in consumer-to-consumer sexual activity.

The transportation guidelines:

- a. Require written parent/guardian permission from all consumers on the trip. Employees take these permission forms and medical releases with them on the trip.
- b. Require employees to have a list of the consumers on the trip. The employees take roll when boarding the bus, when leaving the bus, periodically throughout the trip, and then again when boarding the bus.
- c. Specify employees-to-consumer ratios. When possible, do not count the driver in the supervision ratio.
- d. Require employees to sit in seats that permit maximum supervision.
- e. Discourage mixed age groups from sitting together. When possible, high risk consumers are seated by themselves or with a employees member.
- f. Prohibit drivers from making unauthorized stops.
- g. Where applicable (such as in mentoring programs), require employees to document the beginning and ending time of the trip and the mileage, names of the consumers being transported, and the destination.
- h. Require documentation of any unusual occurrences.

When public transportation is used:

- a. In addition to the transportation procedures listed above, consumers should remain in one area of the bus, if possible.
- b. Employees and volunteers that are assigned to a group should remain with that group on the bus.
- c. Take a head count or call roll immediately after entering and leaving the bus.

In situations where employees transport consumers in non-organization vehicles:

- a. Administrators must be notified of all transportation activities.
- b. Use the “rule of three” when transporting consumers: At least two adults must transport a single consumer, or at least two consumers must be present if transported by a single adult.
- c. Consumers must never be transported without written permission from a parent/guardian.
- d. Consumers must be transported directly to their destination. No unauthorized stops may be made.
- e. A employees member must document beginning and ending times and mileage, the names of consumers, and other employees and volunteers who are involved in transportation, purpose of the transportation, and destination.
- f. Employees must avoid unnecessary physical contact with consumers while in vehicles.
- g. When possible, employees should avoid engaging in sensitive conversations with consumers.

8. Off-Site Activities

The off-site procedures include:

- a. Requiring supervisor approval for all off-site activities.
- b. Requiring parent/guardian approval.
- c. Specifying employees-to-consumer ratios for the activity.
- d. Requiring employees and consumers to be easily identifiable.
- e. Including specific bathroom and locker room procedures as applicable to outing.
- f. Including transportation procedures.
- g. Including instructions for a supervisor to observe the off-site activities at scheduled times and random intervals.
- h. Considering specific recommendations based on the location and type of activity (for example, Amusement parks, Water Parks, Arcades, etc.).

9. Overnight Activities

Overnight stays present unique risks to consumers and employees. They often involve changing clothes, groups of both genders and different ages in a more intimate atmosphere than usual, more unstructured activities, and increased supervision demands for employees.

Supervision Guidelines:

- a. All overnight activities must be documented and approved in writing by the Program Director.
- b. Administrators are expected to regularly and randomly observe overnight activities on a scheduled and periodic basis.
- c. The Director should appoint a “lead” employees to supervise the overnight. A meeting with all employees is conducted to discuss the unique risks of overnight trips, unique elements of the specific overnight trip and to review the specific policies and procedures.
- d. Provide parents/guardians with written information about the overnight activity. All parents/guardians must sign a permission slip for their consumers to attend the overnight.
- e. Determine the appropriate employees-to-consumer ratios before the event and schedule employees accordingly.
- f. Meetings with the group should be hosted in open and observable areas; meetings should not be hosted in employees or consumer rooms.

Overnights at the Facility:

- a. Physical boundaries within the organization must be clearly defined and explained to the consumers .
- b. Assign each employees to a specific group of consumers to supervise. Each employees should then maintain a role sheet that lists all of the consumers in his or her group. Head counts and roll checks should be conducted routinely throughout the evening.
- c. Assign employees to high risk areas in your organization's facility, such as the bathrooms, entrances and exits, hallways, etc. If it is not possible to assign specific employees to these areas, assign specific employees to conduct periodic facility "walk-throughs".
- d. With regards to sleeping arrangements, separate the male and female consumers into separate rooms and post employees at the entrances and exits to these rooms. If this is not feasible, separate males and females by as much space as possible.
- e. When performing room checks, employees should always go in pairs.
- f. At least one employees must stay awake overnight.

Overnights Away from the Facility:

- a. Overnight stays at private homes are prohibited unless approved by the administration.
- b. Physical boundaries at the off-site location must be clearly defined and explained to the consumers.
- c. Assign each employees to a specific group of consumers to supervise. Each employees should then maintain a role sheet that lists all of the consumers in his or her group. Head counts and roll checks should be conducted routinely throughout the event.
- d. If in a cabin type setting, the employees should be placed in bunks to maximize supervision around the cabin and in a way that decreases the chances of consumers sneaking out (such as by the door).
- e. In hotel rooms, assign consumers to rooms based on sex and age. Employees should have their own rooms. If employees must share rooms with consumers, they must have their own beds and never change in front of consumers.
- f. All employees are to be on duty in the halls or cabins at night until an hour after lights out and all rooms are quiet.

10. Teen Leadership Program

1. Define the Teen Leadership Program.

- i. What is the goal of the program?

For example, is the program designed for older campers who desire to become counselors, or is it designed for campers too old for the program but who still want to participate?

- ii. How does the program fit the mission of the camp?

- iii. What is the teen leader's role in the program?

- iv. What ages of campers are allowed to participate in the teen program?

- v. Who is responsible for supervising the teen program?

2. Create Policies for the Teen Leadership Program.

- Outline appropriate and inappropriate physical, verbal, emotional, and behavioral boundaries between teen leaders and campers and between teen leaders and employees.
- Prohibit teen leaders from being one-on-one with campers.
- Prohibit teen leaders from escorting campers to the bathrooms.
- Prohibit teen leaders from assisting campers with changing their clothes.
- Require teen leaders to wear clothing or lanyards that identify them as leaders-in-training and differentiate them both from employees and younger campers.
- Develop policies governing where teen leaders may spend their time off. For example, are teen leaders permitted to hang out in areas reserved for employees?

3. Create Screening Practices for the Teen Leadership Program.

- Require teen leaders to fill out an application.
- Check references from the teens' parents, teachers, counselors, and/or coaches.
- Interview the teen leaders.
- Include the teens' parents in these interviews when possible.

4. Train Teen Leaders.

- Train employees and supervisors in how to monitor teen leaders.
- Require teen leaders to attend abbreviated trainings on the following topics:
 - Their role as a leader, including what they are and are not allowed to do.
 - General abuse risk management, boundaries, and self-protection.
 - Preventing consumer-to-consumer sexual activity.
 - How to report concerns about themselves or the campers in the program.

5. Monitor Teen Leaders.

- Designate a specific employees person who is in charge of the teen leadership program and its participants.
- Consider requiring teen leaders to keep a log documenting their daily activities and any problems they encounter. The program supervisor should review these logs daily.
- The camp director should conduct daily check-ins with teen leaders and their supervisors.

11. Sample Program Quick Check

Offenders need three things to abuse: **access** to consumers, **privacy** with consumers, and **control** over consumers. This quick check is designed to help reduce an offender's opportunity to gain access, privacy, and control in our program. It can also be used to identify situations where one consumer could be alone with another consumers.

Access

1. Employees and volunteers interacting with consumers are easily identifiable (ex. uniforms, badges, lanyards, etc.).

Yes _____ No _____

Notes: _____

2. Employees and volunteers are actively engaged with consumers and appropriately supervising them (ex. consumers remain in line of sight; employees are not on cell phones, etc.).

Yes _____ No _____

Notes: _____

3. Where applicable, consumers remain within designated program areas.

Yes _____ No _____

Notes: _____

Privacy

4. Employees, volunteers, and consumers interact in open and observable environments (ex. one-on-one situations are limited; classroom windows are not covered; unused rooms are locked; etc.).

Yes _____ No _____

Notes: _____

Control

5. Employees and volunteers maintain appropriate boundaries with consumers. (ex. Employees and volunteers give side hugs, use appropriate language, etc.). This applies to employees and volunteers interacting with consumers as well as consumers interacting with other consumers.

Yes _____ No _____

Notes: _____

6. Please provide any other observations (such as policy violations that concerned you). Please provide constructive feedback for this program.

Notes: _____

12. Supervisors and Administrators Monitoring On-Site and Off-Site Programs

Keep a record. Document your supervision visits. Include information like your arrival and departure times, which consumers and parents/guardians were present, and a summary of the information collected. Provide employees with feedback about visits.

Vary your observation times. Do not develop a predictable pattern of observation. Drop in at different times each day. Occasionally leave and come back immediately.

Arrive before employees. Check punctuality and the routine that employees follow to prepare for the consumers to arrive.

Survey the physical environment. Is this a suitable location for the activity (e.g. size of area for number of consumers, ability to supervise all areas used by consumers, landscaping that may inhibit supervision)?

Watch activities. Are they planned and organized? Are the employees actively involved? Ask to see the schedule of activities and compare with what is actually going on at a given time.

Observe bathroom and locker room activities. Observe bathroom and locker room activities to ensure that the employees are complying with the established policies and procedures.

G. Sample Abuse Risk Management Items for Job Descriptions and Performance Evaluations

Sample Job Description Language

Employees and volunteers who directly supervise consumers will:

- Adhere to policies related to boundaries with consumers.
- Attend required abuse risk management training.
- Adhere to procedures related to managing high-risk activities and supervising consumers.
- Report suspicious or inappropriate behaviors and policy violations.
- Follow mandated abuse reporting requirements.

Employees and volunteers who do not directly supervise consumers will:

- Adhere to policies related to boundaries with consumers.
- Attend required abuse risk management training.
- Report suspicious and inappropriate behaviors and policy violations.
- Follow mandated abuse reporting requirements.
- Adhere to job specific abuse risk management responsibilities.
- Maintenance employees and volunteers—ensure unused rooms and closets remain locked; routinely monitor high-risk locations (locker-rooms and bathrooms), etc.
- Front desk personnel—ensure consumers are properly signed in and signed out, ensures only authorized adults are allowed in the facility, etc.

Supervisors and administrators will:

- Follow employees and volunteers screening requirements and use screening instruments to screen for abuse risk.
- Provide employees and volunteers with on-going supervision and training related to abuse risk.
- Provide employees and volunteers with regular feedback regarding their boundaries with consumers.
- Require employees and volunteers to adhere to policies and procedures related to abuse risk.
- Respond quickly to policy and procedure violations using the organization's progressive disciplinary procedures.
- Respond seriously and confidentially to reports of suspicious and inappropriate behaviors.
- Follow mandated reporting requirements.
- Communicate to all employees and volunteers the organization's commitment to protect their consumers from abuse.

- Report essential abuse risk management information to the board of directors.

Performance Evaluations

Abuse Risk Management Items for Performance Evaluations:

- **Trainability:** Attends all required trainings. Able to comprehend and behaviorally incorporate new information and skills. Willing to utilize training and supervision to modify and improve performance. Keeps required training hours current.
- **Teaching:** Able to identify opportunities for teaching and to use these opportunities to help others develop and maintain new ideas and skills.
- **Team Interaction:** Able to communicate with others in a helpful manner while simultaneously building credibility and rapport. Able to accept the suggestions and feedback of others and provide suggestions and feedback in a manner that is conducive to success.
- **Policy Adherence:** Able to conform to established policies and procedures in all functions of job performance, both with clients and with colleagues.
- **Judgment:** Able to solve problems by considering all aspects of a situation. Able to balance the desires and needs of consumers with the concerns of parents. Consistently exhibits good decision-making and a realistic understanding of issues even when dealing with emotional or sensitive topics.
- **Spoken Communication:** Able to verbalize information clearly. Able to influence or persuade others in both positive and negative circumstances. Able to listen well and understand others. Able to communicate directly and appropriately with supervisors, co-workers, parents, and consumers.
- **Boundaries:** Able to establish rapport with consumers without relinquishing the adult role. Able to separate personal needs and issues from those of the consumers in care.

Sample Performance Evaluation

Name: _____

Location: _____

Date: _____

Time: _____

| | Not Satisfactory | | Satisfactory | | Exceeds Satisfactory |
|--|------------------|---|--------------|---|----------------------|
| Tone of voice | 1 | 2 | 3 | 4 | 5 |
| Use of appropriate affection | 1 | 2 | 3 | 4 | 5 |
| Use of appropriate verbal interactions | 1 | 2 | 3 | 4 | 5 |
| Behavior management skills | 1 | 2 | 3 | 4 | 5 |
| Engages in activities with consumers | 1 | 2 | 3 | 4 | 5 |
| Overall supervision of consumers | 1 | 2 | 3 | 4 | 5 |
| Adherence to safety best practices | 1 | 2 | 3 | 4 | 5 |
| Responds well to feedback | 1 | 2 | 3 | 4 | 5 |
| Communication with peers | 1 | 2 | 3 | 4 | 5 |
| Communication with supervisor | 1 | 2 | 3 | 4 | 5 |
| Completes required training | 1 | 2 | 3 | 4 | 5 |
| Punctuality | 1 | 2 | 3 | 4 | 5 |
| Attends employees meetings | 1 | 2 | 3 | 4 | 5 |
| Documentation | 1 | 2 | 3 | 4 | 5 |
| Overall job performance | 1 | 2 | 3 | 4 | 5 |

Comments:

Strengths _____

Areas of Improvement _____

Growth Goals _____

Signature of Supervisor: _____

Signature of Employee/Volunteer: _____

VI. Responding

How an organization responds to suspicious or inappropriate interactions, policy violations, and incidents or allegations of abuse can dramatically affect the harm to the individuals involved and the damage to the organization. Once a employees member, volunteer, consumer, or parent/guardian has expressed a concern or made an allegation about the treatment of a consumer, swift and determined action must be taken to reduce any subsequent risk to the consumer, to the accused employees member or volunteer, and to the organization. Organizations must establish precise, unequivocal requirements for reporting to the authorities and for adhering to a serious-incident response plan.

A. Responding to Suspicious or Inappropriate Behaviors or Policy Violations

Because our organization is dedicated to maintaining zero tolerance for abuse, it is imperative that every employees member actively participates in the protection of consumer. In the event that employees observe any suspicious or inappropriate behaviors and/or policy violations on the part of other employees or volunteers, it is their personal responsibility to immediately report their observations.

Remember, at our organization, the policies apply to everyone.

Examples of Suspicious or Inappropriate Behaviors Between Employees/Volunteers and Consumer

- Violation of the abuse prevention policies described above
- Seeking private time or one-on-one time with consumers
- Buying gifts for individual consumers
- Making suggestive comments to consumers
- Picking favorites

All reports of suspicious or inappropriate behavior with consumers will be taken seriously. Our procedures will be carefully followed to ensure that the rights of all those involved are protected.

1. Employees and Volunteer Response:

If employees witness suspicious or inappropriate behaviors or policy violations from another employee or volunteer, the employees or volunteer is instructed to do the following:

Guidelines for Employees/Volunteers Response to Suspicious or Inappropriate Behaviors and/or Policy Violations

- Interrupt the behavior.
- Report the behavior to a supervisor, director, or other authority.
- If you are not comfortable making the report directly, make it anonymously.
- If the report is about a supervisor or administrator, contact the next level of management.
- Document the report but do not conduct an investigation.

2. Supervisor and Administrator Response:

In the event that a supervisor or an administrator receives a report of suspicious or inappropriate behaviors or policy violations from a employees member or volunteer, the supervisor is instructed to do the following:

Guidelines for Supervisors and Administrators Response to Suspicious or Inappropriate Behaviors and/or Policy Violations

- Report to the next level of administration and determine the appropriate administrator to respond to the concern.
- Determine the appropriate response based on the report.
- Speak with the employees or volunteer who has been reported.
- Review the file of the employees or volunteer to determine if similar complaints were reported.
- Document the report on the appropriate form.
- If at any point in gathering information about a report of suspicious or inappropriate behavior, a concern arises about possible abuse, contact the state authorities and file a report.
- If appropriate, notify parents and/or guardians.

Based on the information gathered, the following may be required:

- a. Increase monitoring or supervision of the employees, volunteer, or program.
- b. If policy violations with consumers are confirmed, the employees or volunteer must be subject to disciplinary action up to and including termination and prosecution. Disciplinary action will follow the Progressive Disciplinary Process outlined in this manual.

If more information is needed, interview and/or survey other employees and volunteers or consumers.

3. Organizational Response:

Guidelines for Organizational Response

- Review the need for increased supervision.
- Review the need for revised policies or procedures.
- Review the need for additional training.

B. Responding to Suspected Abuse by an Adult

1. Employees or Volunteer Response to Abuse:

As required by mandated reporting laws, employees and volunteers must report any suspected abuse or neglect of a consumer—whether on or off organization property or whether perpetrated by employees, volunteers, or others—to state authorities. Reports may be made confidentially or anonymously. A person who mistakenly reports suspected abuse is immune from civil or criminal liability as long as the report was made in good faith and without malice. **Refer to state specific mandated reporting requirements for definitions of abuse more specific reporting information.*

In addition to reporting to state authorities, employees and volunteers are required to report any suspected or known abuse of consumers perpetrated by employees or volunteers directly to leadership so that immediate and proper steps may be taken to ensure the safety of alleged victims and others who may be at risk. Reports of suspected or known abuse may be made confidentially to the following:

- a. Immediate supervisor
- b. Directors
- c. Administrators

Additional Guidelines for Employees/Volunteer Response to Incidents or Allegations of Abuse

- If you witness abuse, interrupt the behavior immediately.
- If abuse is disclosed to you, assure the individual disclosing that he or she was correct to tell to you.
- Protect the alleged victim from intimidation, retribution, or further abuse.
- Immediately report the allegation or incident to the proper organization authorities (based on mandatory reporting requirements) and the designated authority.
- Be sure to document the incident, disclosure, or any circumstances causing your suspicion of abuse. State only the facts.
- It is not your job to investigate the incident but it **IS** your job to report the incident to your supervisor in a timely manner.
- Check back to make sure appropriate steps were taken. If not, report again to your supervisor or the designated organization authority.

2. Supervisors and Administrators Response to Abuse:

In addition to the above response procedures, supervisors and administrators should ensure the following:

Guidelines for Supervisor and Administrators Responding to Allegations or Incidents of Abuse

- First, determine if the consumer is still in danger and if so, take immediate steps to prevent any further harm.
- Gather as much information about the allegation as you can. For example, who made the report, who was allegedly abused, who was the alleged abuser, what was the nature of the alleged abuse, where and when did the alleged abuse occur, etc.
- Accurately record everything you learn in as much detail as you can. Remember your notes may be read by others. Stick to the facts.
- Contact the appropriate local authorities as indicated by your mandatory reporting procedures. Make sure you get a case number and the name and contact information of the person with whom you speak at the reporting agency.
- If the alleged abuse involves a employees member or volunteer, notify your crisis management team and follow your crisis management plan.
- Suspend the accused employees or volunteer until the investigation is completed.

C. Responding to Consumer-to-Consumer Sexual Abuse and Sexualized Behaviors

The thought that one consumer may sexually abuse another consumer does not occur to many people. Unfortunately, abuse between peers has increased 300% in the past few years. Consumer -to- Consumer sexual activity and sexualized behaviors often remain unreported in organizations because employees and volunteers are not comfortable documenting these situations or may not know how.

1. Consumer -to- Consumer Interactions:

Most serious incidents of consumer -to- consumer abuse are preceded by more subtle incidents such as name-calling, taunting, or roughhousing. Interrupting these interactions early and establishing and communicating standards of conduct can keep the program environment safe. Our organization recognizes that the following interactions are high risk and should be prohibited:

| <i>Prohibited Consumer -to-Consumer Interactions</i> |
|---|
| <ul style="list-style-type: none">• Hazing• Bullying• Derogatory name-calling• Games of Truth or Dare• Singling out one child for different treatment• Ridicule or humiliation |

In order to adequately respond to and track incidents within the organization, all sexual activity between consumers and sexualized behaviors of consumers must be consistently documented.

2. Employees and Volunteer Response:

Consumer -to- Consumer sexual behaviors can include inappropriate touching, exposing body parts, using sexualized language, making threats of sexual activity, engaging in sexual activity, and similar types of interactions.

If employees witness consumer -to- consumer sexual behaviors, they are instructed to follow these guidelines:

Guidelines for Employees and Volunteers Responding to Consumer-to-Consumer Sexual Activity

- If you observe sexual activity between consumers, you should immediately separate them.
- Calmly explain that such interactions are not permitted and separate the consumers .
- Notify your supervisor.
- Complete the necessary paperwork including what you observed and how you responded.
- Follow your supervisor's instructions regarding notifying the authorities and informing the parents/guardians of the consumer involved.
- In some cases, if the problem is recurring discipline may be required including not

3. Supervisors and Administrators Response:

In the event that a supervisor or administrator receives a report of a consumer's sexualized behavior or consumer -to- consumer sexual activity, the supervisor should do the following:

Guidelines for Supervisors and Administrators Responding to Consumer-to-Consumer Sexual Activity

- Meet with the employees who reported the sexual activity to gather
- Confirm that the consumers involved have been separated or placed under increased supervision.
- Review the steps taken by the employees on duty.
- Review the incident report to confirm it is accurately and thoroughly completed.
- Meet with parents/guardians of the consumers involved.
- Determine what actions should be taken to make sure there is no recurrence, including assessing the contribution of the program for the children involved
- Notify the proper authorities.
- Develop a written corrective action or follow-up plan in response to the incident

Based on the information gathered, the following may be required:

- c. Review the need for additional supervision

- d. Review the need for revised policies or procedures
- e. Review the need for additional training
- f. Alert others in the organization

4. Organizational Response:

After the internal review of the sexualized behavior or consumer -to- consumer sexual activity, the organization will determine what can be done to prevent a reoccurrence, such as:

| <i>Guidelines for Organizational Response</i> |
|--|
| <ul style="list-style-type: none">• Review the need for additional supervision.• Review the need for revised policies or procedures.• Review the need for additional training.• Alert others in the organization. |

Acknowledgment of Abuse Prevention Manual

I have read and agree to comply with my organization's policies regarding sexual abuse prevention.

Signature of Employee or Volunteer

Date

VII. Administrative Practices

A. Sample Critical Incident Management Plan

Prior to Allegation/Incident

- Determine who from your Organization will be on the Critical Incident Management Team.
- Educate all employees and volunteers on what to do if someone alleges current or historical abuse involving an Organization member, employee or volunteer.
- All employees and volunteers should know how to fulfill their duties as mandated reporters (if they are mandated reporters according to state law).
- All employees and volunteers should be trained on how to complete the appropriate critical incident forms for your Organization.

Immediate Safety

- Follow all mandated reporting requirements and contact the authorities as appropriate.
- Where applicable, prevent the accused from having further access to children until a thorough incident review is completed. Before beginning an internal incident review, verify with local authorities that this will not interfere with their investigation.
- If the accused person is an employee, follow progressive discipline procedures accordingly. This may involve suspending the accused during the investigation.
- When applicable, notify other employees.

Initial Communication Plan

- Designate a point person to respond to all inquiries from parents, the media, and other stakeholders.
 - Prepare a short media statement in advance of getting a media inquiry.
 - All oral and written communication should speak with a voice of compassion and confidence.
 - All employees and volunteers should know how to refer media inquiries to the appropriate person.
- As soon as possible, meet in person (not over the phone) with identified victims and their parents/guardians.
 - Reassure them that you are taking this seriously.
 - Find out what response they expect and be prepared to explain support you will offer, such as counseling.

- Consider reaching out in writing to parents/guardians of all children currently attending your Organization as well as those with past contact with the accused offender.
 - The message should communicate:
 - **Empathy:** Begin by stating that such incidents run counter to your Organization’s values.
 - **Facts:** Include a summary of the incident, including information about the arrest, suspension, investigation, etc.
 - **Contact Request.** Ask parents to contact you or the specified authorities if they suspect their child may have been abused.
 - **Your Response:** Explain that you are fully cooperating with the authorities. Describe proactive steps you are taking such as offering resources to parents, hosting a parent meeting, training employees, and conducting an independent investigation to learn from this incident so you can prevent it from happening again.
- Host a parent/guardian meeting to speak directly with concerned families and directly answer any questions before rumors or misinformation is spread.
 - Communicate as much information as you can about the incident.
 - Provide information regarding the proactive steps leadership is taking in response to the incident.
 - Describe resources you are providing families, and give parents a chance to ask questions.
 - Provide parents with information about how to talk to their children about abuse.

Ongoing Communication and Response

- Determine how to manage ongoing relations with authorities, parents, the community, and media.
 - Consider adding a page to your website with updated details about the incident.
 - Designate specific individuals in your organization to handle various communications and outreach efforts.

Promote Prevention at All Levels of the Organization

- Educate parents on abuse prevention. Offer a workshop during which parents can learn how to protect their children from abuse. This is an educational session that is different from the parent meeting described above.
- Provide a consumer education program to all consumers involved with your Organization on how to protect themselves from abuse and how to express concerns.
- Train (or –re-train) all employees and volunteers on how to identify and report red-flag behaviors that do not rise to the level of suspected abuse. This is an important part of the overall response and ongoing prevention effort.

