Child Abuse Policy

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.**

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2019 Community CARES

I.   General Definitions

A. Types of abuse

1. <u>Physical abuse</u> is injury that is intentionally inflicted upon a consumer.

2. <u>Sexual abuse</u> 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. <u>Emotional abuse</u> 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. <u>Neglect</u> 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 Consumer

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

Community CARES provides our clients 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. Community CARES will fully cooperate with authorities if allegations of abuse are made that require investigation.

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

1. Clients will be treated with respect at all times.

2. Clients will be treated fairly regardless of race, sex, sexual orientation, gender identification, age, or religion.

3. Staff and volunteers will adhere to uniform standards of displaying affection as outlined by our organization.

4. Staff and volunteers will avoid affection with clients that cannot be observed by others.

5. Staff and volunteers will adhere to uniform standards of appropriate and inappropriate verbal interactions as outlined by our organization.

6. Staff and volunteers will not stare at or comment on clients bodies.

7. Staff and volunteers will not date or become romantically involved with clients.

8. Staff and volunteers will not use or be under the influence of alcohol or illegal drugs in the presence of clients.

9. Staff and volunteers will not have sexually oriented materials, including printed or online pornography, on our organization's property.

10. Staff and volunteers will not have secrets with clients and will only give gifts with prior permission.

11. Staff and volunteers will comply with our organization's policies regarding interactions with clients outside of our programs.

12. Staff and volunteers will not engage in inappropriate electronic communication with clients.

13. Staff and volunteers are prohibited from working one-on-one with clients in a private setting. Staff and volunteers will use common areas when working with individual consumers.

14. Staff and volunteers will not abuse clients 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. Community CARES will not tolerate the mistreatment or abuse of one client by another client. 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.

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

16. All staff must follow state specific mandatory reporting requirements. Staff should be trained to be aware of and understand their legal and ethical obligation to recognize and report suspicions of mistreatment and abuse. Staff 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. Staff and volunteers will report concerns or complaints about other staff, volunteers, adults, or clients to the executive director.

18. Community CARES cooperates fully with the authorities to investigate all cases of alleged abuse. Any staff 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. Staff and volunteers may not have engaged in or been accused or convicted of consumer abuse, indecency with a client, or injury to a client.

III.   Policies

Policies define the bandwidth of acceptable behavior in an organization. Because offenders often violate policies to gain access to clients, when staff 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

Community CARES physical contact policy promotes a positive, nurturing environment while protecting clients and staff. Community CARES encourages appropriate physical contact with clients and prohibits inappropriate displays of physical contact. Any inappropriate physical contact by staff towards consumers in the organization's programs will result in disciplinary action, up to and including termination of employment.

Community CARES policies for appropriate and inappropriate physical interactions are:

Appropriate Physical Interactions	Inappropriate Physical Interactions
• Side hugs • Shoulder-to-shoulder or "temple" hugs • Pats on the shoulder or back • Handshakes • High-fives and hand slapping • Verbal praise • Pats on the head when culturally appropriate • Touching hands, shoulders, and arms • Arms around shoulders • Holding hands (with young children in escorting situations)	• Full-frontal hugs • Kisses • Showing affection in isolated area • Lap sitting • Wrestling • Piggyback rides • Tickling • Allowing a consumer to cling to an employee's or volunteer's leg • Any type of massage given by or to a consumer • Any form of affection that is unwanted by the client or the staff or volunteer • Compliments relating to physique or body development • Touching bottom, chest, or genital areas

B. Interaction

Staff 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. Staff and volunteers must not initiate sexually oriented conversations with clients.
Staff and volunteers are not permitted to discuss their own sexual activities with clients.

Community CARES policies for appropriate and inappropriate verbal interactions are:

Appropriate Verbal Interactions	Inappropriate Verbal Interactions
- Positive reinforcement - Appropriate jokes - Encouragement - Praise	- Name-calling - Discussing sexual encounters or in any way involving clients in the personal problems or issues of staff 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 client or his/her family

C. One-on-One Interaction

Most abuse occurs when an adult is alone with a client. Community CARES aims to eliminate or reduce these situations and prohibits private one-on-one interactions unless approved in advance by the executive director.

In those situations where one-on-one interactions are approved, staff 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 client, 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 staff and volunteers that you are alone with a client 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.

. Tutoring/ Private Coaching:

One-on-one situations, such as tutoring and private coaching sessions, introduce additional risks for false allegations. Staff and volunteers should be aware of our policies regarding tutoring and private coaching:

a. Staff and volunteers must have supervisor approval for any tutoring or private coaching sessions.
b. Tutoring and coaching sessions with our organization's client may not occur outside of the organization.
c. Supervisors must keep a schedule of private tutoring and coaching sessions, which should include times, consumers involved, and location of sessions.

D. Off-site Contact

Many cases of organizational abuse occur off-site and outside of regularly scheduled activities. This contact outside of regularly scheduled activities may put staff, volunteers, and our organization at increased risk.

. **Preferred Option One:**

Our organization prohibits interactions outside of regularly scheduled program activities unless approved by the executive director.

2. **Option Two:**

Community CARES strongly recommends that staff do not have outside contact with clients from the organization. However, if off-site contacts are unavoidable (such as during mentoring programs), Community CARES has determined that the following forms of outside contact are appropriate and inappropriate:

Appropriate Outside Contact	Inappropriate Outside Contact
• Taking groups of clients on an outing • Attending sporting activities with groups of clients • Attending functions at a client's home, with parents/guardians present	• Taking one clients on an outing without the parents'/guardians' written permission • Visiting one client in the client's home, without a parent/guardian present • Entertaining one client in the home of staff or volunteers • A lone client spending the night with staff or volunteers

In addition, when outside contact is unavoidable, ensure that the following steps are followed:

. Supervisors should identify for staff and volunteers what types of outside contact are appropriate and inappropriate.

2. Ensure that staff or volunteers have the parents'/guardians' permission to engage in outside contact with the client. Consider requiring the parents/guardians to sign a release-of-liability statement.

E. Electronic Communication

Any private electronic communication between staff and clients, including the use of social networking websites like - Facebook, Instagram, Snapchat, instant messaging, texting, etc. - is prohibited. All communication between staff and clients must be transparent.

The following are examples of appropriate and inappropriate electronic communication.

Appropriate Electronic Communication	Inappropriate Electronic Communication
• Sending and replying to emails and text messages from consumers ONLY when copying in a supervisor or the client's parent/guardian • Communicating through "Community CARES group pages" on Facebook or other approved public forums • "Private" profiles for staff and volunteers which clients cannot access	• Harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning or humiliating comments • Sexually oriented conversations • Private messages between staff and volunteers with clients • Posting pictures of organization participants on social media sites • Posting inappropriate comments on pictures • "Friending" participants on social networking sites

In addition, provide this information to your participant's parents/guardians so that they know what is appropriate and inappropriate from your staff.

. Cell Phone Use:

While assigned to work with clients, staff are not permitted to use electronic communications device except during approved breaks and emergency situations. Internet use, text messaging and/or emailing pictures while assigned to work with consumers is strictly prohibited regardless of the type of device used and whether for business or personal reasons. Employees need to ensure that friends and family members are aware of this policy.

Use of personal electronic communication devices to contact (via voice, text, or pictures/video) organization members and/or program participants for personal and/ or inappropriate reasons shall be grounds for discipline up to and including termination of employment.

2. **Acceptable Use of Cell Phones during Program Hours:**

There are occasions in which staff will need to use personal or organization issued electronic communication devices. In these cases, staff will have explicit direction from supervisors governing use. Situations which may require use of organization issued or personal electronic communication devices include:

   a. Field Trips
   b. Off-site Programs
   c. Emergencies

F. Gift Giving

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

Audience	Content	Timetable	Delivery Method
All employees and volunteers with access to client	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 client	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:

Audience	Armatus® Modules	Timetable
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 staff 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 client. 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. In order to ensure that all of the locations are properly and consistently monitored, designate a staff member who must complete a site inspection checklist.

B. Checking Members into a Facility:

1. When anyone (members, guests, clients, 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**- client 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 staff 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-client ratios.

3. **Mixed Age Groups**- In most incidents involving one client abusing another client, the clients are from different age groups. Each program is responsible for establishing specific guidelines for additional monitoring and supervision of activities that involve clients from different age groups. Staff 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 clients under the age of 2, or 7th grade, should not be alone in the facility without a parent or guardian present. By this age, most clients have had the experience of being without immediate parent/guardian supervision. In addition, 2-year-old clients are able to use self-protection skills in the event that they are approached inappropriately by another client or by an adult.

However, Praesidium also recognizes that many client 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 clients in the facility, we recommend implementing the following practices:

. 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 client's date of birth, and emergency contact information. In addition, require all clients to sign-in AND to sign-out of the facilities so that the program has a record of the clients who are in the facility at all times.

2. Require clients 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 clients 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 client is a guest of a program member, the visiting client 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, clients can be supervised directly, indirectly, or with a combination of the two techniques.

    a. 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 staff assigned to lead and supervise.
    b. 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 staff. Clients should know that they will be supervised by staff at all times, and all staff should know which areas are authorized and which are not.

5. Develop supervision standards for the authorized areas. For example:

    a. Determine how frequently authorized areas should be monitored by staff.
    b. Assign staff specific supervision responsibilities over authorized areas.

  c. Require staff to record when they monitor authorized areas: this may be accomplished by using checklists.

  d. All program staff should wear nametags or identifying clothing so that the client can easily recognize them as staff.

 6. Train all staff:

  a. To greet clients that enter the facility; to direct clients to the structured activities or authorized areas; and, to redirect clients 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 staff to supervise these areas (i.e., Managers on Duty). This staff should document the scheduled and periodic sweeps of high risk locations.

Ultimately, all clients 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. Monitoring High Risk Activities

. Bathroom Activities

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

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

  a. For "Group Bathroom Breaks":
- Require staff to take groups of two or more clients to the bathroom - following the "rule of three" or more.
- If the bathroom only has one stall, only one client should enter the restroom while the others wait outside with the staff.
- If there are multiple stalls, only send in as many clients as there are stalls.
- Minimize clients of different ages using the bathroom at the same time.
- Require staff to stand outside the bathroom door but remain within earshot.

  b. For single use restrooms:
- Require clients to ask permission to use the bathroom.
- Require all staff to frequently check bathrooms.

  c. Prohibit staff from using the bathroom at the same time as clients.

  d. If assisting young clients in the stalls, the staff 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 staff notices anything out of the ordinary or concerning while changing the infant's diaper. Requiring staff to know and follow all licensing requirements having to do with diapering.

For toileting:
   e. Require staff to stand in the doorway with the door ajar while children use the restrooms.
   f. If staff must enter the restroom to assist a child, ensure that the door to the restroom remains open.
   g. When possible, send in only one child at a time.
   h. When not possible, send in only as many children as there are stalls.

3. **Locker Room Activities**

The locker room procedures include:

   a. Requiring staff to stand within earshot of the locker room when in use by consumers.
   b. Requiring staff 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**

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

   a. While the consumers shower, at least one staff member should stand in the bathroom doorway and within earshot of the clients. Ensure that only one client is in each shower (Consider utilizing shower curtains that do not go all the way to the floor, so that staff can easily see how many clients 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, staff and volunteers may not be assigned a particular group of clients to supervise. To decrease the risk of incidents, implement the following procedures:

   a. Require clients to remain in line-of-site of staff at all times.
   b. Specify the staff-to-consumer ratio.
   c. Specify narrow geographic boundaries in the program areas.
   d. Ensure that all staff 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 are.

6. **Playground Activities**

The playground procedures require:

   a. Clients to remain in line-of-site of staff 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 staff are assigned specific areas to supervise ("zone monitoring").
   e. Specific bathroom procedures.
   f. Staff 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 clients may increase the risk of abuse or false allegations of abuse because staff and volunteers may be alone with a client or may make unauthorized stops with clients. In addition, transportation activities may provide a time for unsupervised clients to engage in client-to-client sexual activity.

The transportation guidelines:

   a. Require written parent/guardian permission from all clients on the trip. Staff take these permission forms and medical releases with them on the trip.
   b. Require staff to have a list of the clients on the trip. The staff take roll when boarding the bus, when leaving the bus, periodically throughout the trip, and then again when boarding the bus.
   c. Specify staff-to-client ratios. When possible, do not count the driver in the supervision ratio.
   d. Require staff to sit in seats that permit maximum supervision.
   e. Discourage mixed age groups from sitting together. When possible, high risk clients are seated by themselves or with a staff member.
   f. Prohibit drivers from making unauthorized stops.
   g. Where applicable (such as in mentoring programs), require staff to document the beginning and ending time of the trip and the mileage, names of the clients 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, clients should remain in one area of the bus, if possible.
  b. Staff 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 staff transport clients 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 client, or at least two clients must be present if transported by a single adult.
  c. Clients must never be transported without written permission from a parent/guardian.
  d. Clients must be transported directly to their destination. No unauthorized stops may be made.
  e. A staff member must document beginning and ending times and mileage, the names of clients, and other staff and volunteers who are involved in transportation, purpose of the transportation, and destination.
  f. Staff must avoid unnecessary physical contact with clients while in vehicles.
  g. When possible, staff should avoid engaging in sensitive conversations with clients.

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 staff-to-client ratios for the activity.
  d. Requiring staff and clients 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.).

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9. **Overnight Activities**

Overnight stays present unique risks to clients and staff. 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 staff.

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" staff to supervise the overnight. A meeting with all staff 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 clients to attend the overnight.
e. Determine the appropriate staff-to-client ratios before the event and schedule staff accordingly.
f. Meetings with the group should be hosted in open and observable areas; meetings should not be hosted in staff or client rooms.

Overnights at the Facility:

a. Physical boundaries within the organization must be clearly defined and explained to the clients.
b. Assign each staff to a specific group of clients to supervise. Each staff should then maintain a role sheet that lists all of the clients in his or her group. Head counts and roll checks should be conducted routinely throughout the evening.
c. Assign staff 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 staff to these areas, assign specific staff to conduct periodic facility "walk-throughs".
d. With regards to sleeping arrangements, separate the male and female consumers into separate rooms and post staff 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 preforming room checks, staff should always go in pairs.
f. At least one staff 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 staff to a specific group of clients to supervise. Each staff should then maintain a role sheet that lists all of the clients 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 staff 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 clients to rooms based on sex and age. Staff should have their own rooms. If staff must share rooms with consumers, they must have their own beds and never change in front of clients.
f. All staff are to be on duty in the halls or cabins at night until an hour after lights out and all rooms are quiet.

0. **Teen Leadership Program**

Older clients who participate in teen leadership programs are still client participants and not staff or volunteers. Therefore, even though they are often given more responsibility, teens in the leadership programs must be provided with guidelines regarding appropriate behavior, and then supervised accordingly. In addition, staff and volunteers must understand and recognize that these teens are still clients and not their peers. Therefore, the following guidelines are recommended for teen leadership programs:

a. Create a screening process for teen leaders which includes
   - A standard application
   - An interview with behaviorally based interview questions
   - References (from teachers, counselors, family friends, etc.)

b. Train teen leaders in their role in programs and on program policies about appropriate and inappropriate interactions. This training should include the following information:
   - Appropriate and inappropriate physical and verbal interactions and the importance of maintaining behavioral boundaries between teen leaders and younger clients and between teen leaders and staff and volunteers.
   - Prohibiting teen leaders from being one-on-one with clients.
   - Prohibiting teen leaders from escorting clients to the bathrooms.
   - Prohibiting teen leaders from assisting clients with changing their clothes.

c. Create a system to monitor the teen leaders.
   - Designate a specific employee or volunteer who is in charge of the teen leadership program and its participants.
   - Require teen leaders to wear clothing or lanyards that identify them as leaders-in- training and differentiate them from both staff and volunteers and from younger clients.
   - Require a supervisor to conduct daily check-ins with teen leaders and their program supervisors.
   - 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.

F. 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 clients and parents/guardians were present, and a summary of the information collected. Provide staff 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 staff. Check punctuality and the routine that staff follow to prepare for the clients to arrive.

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

Watch activities. Are they planned and organized? Are the staff 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 staff are complying with the established policies and procedures.

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 staff member, volunteer, client, or parent/guardian has expressed a concern or made an allegation about the treatment of a client, swift and determined action must be taken to reduce any subsequent risk to the client, to the accused staff member or volunteer, and to the organization. Community CARES 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 Community CARES is dedicated to maintaining zero tolerance for abuse, it is imperative that every staff member actively participates in the protection of client. In the event that staff observe any suspicious or inappropriate behaviors and/or policy violations on the part of other staff or volunteers, it is their personal responsibility to immediately report their observations.

Remember, at Community CARES, the policies apply to everyone.

Examples of Suspicious or Inappropriate Behaviors Between Staff, Volunteers and Client
• Violation of the abuse prevention policies described above
• Seeking private time or one-on-one time with clients
• Buying gifts for individual clients
• Making suggestive comments to clients
• Picking favorites

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

1. **Staff and Volunteer Response**:

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

<table>
<tr><td><i>Guidelines for Staff, Volunteers Response to Suspicious or Inappropriate Behaviors and or Policy Violations</i></td></tr>
<tr><td>

- 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. Executive Director?
- Document the report but do not conduct an investigation.
- Keep reporting until the appropriate action is taken.

</td></tr>
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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 staff member or volunteer, the supervisor is instructed to do the following:

<table>
<tr><td><i>Guidelines for Supervisors and Administrators Response to Suspicious or Inappropriate Behaviors and or Policy Violations</i></td></tr>
<tr><td>

- 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 staff or volunteer who has been reported.
- Review the file of the staff 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.
- Advise the person who reported the behavior that the report is being taken seriously.

</td></tr>
</table>

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

    a.   Increase monitoring or supervision of the staff, volunteer, or program.
    b.   If policy violations with clients are confirmed, the staff 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 staff and volunteers or clients.

3. **<mark>Organizational</mark> Community CARES 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. Staff or Volunteer Response to Abuse:

As required by mandated reporting laws, staff and volunteers must report any suspected abuse or neglect of a
client—whether on or off organization property or whether perpetrated by staff, 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, staff and volunteers are required to report any suspected or known abuse of clients perpetrated by staff 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 Staff and 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 client 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 staff member or volunteer, notify your crisis management team and follow your crisis management plan.
>
> - Suspend the accused staff or volunteer until the investigation is completed.

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

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

1. Client-to-Client Interactions:

Most serious incidents of client -to- client 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:

> *Prohibited Client -to-Client Interactions*

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

- Hazing
- Bullying
- Derogatory name-calling
- Games of Truth or Dare
- Singling out one child for different treatment
- Ridicule or humiliation

2. **Staff and Volunteer Response:**

Client -to- Client 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 staff witness client -to- client sexual behaviors, they are instructed to follow these guidelines:

Guidelines for Staff and Volunteers Responding to Client-to-Client Sexual Activity

- If you observe sexual activity between clients, you should immediately separate them.

- Calmly explain that such interactions are not permitted and separate the clients

- 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 client involved.

- In some cases, if the problem is recurring discipline may be required including not allowing one or both clients to return to the program.

3. **Supervisors and Administrators Response:**

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

Guidelines for Supervisors and Administrators Responding to Client-to-Client Sexual Activity
• Meet with the staff who reported the sexual activity to gather information.   • Confirm that the clients involved have been separated or placed under increased supervision.   • Review the steps taken by the staff on duty.   • Review the incident report to confirm it is accurately and thoroughly completed.   • Meet with parents/guardians of the clients involved.   • Determine what actions should be taken to make sure there is no recurrence, including assessing the suitability 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. **Community CARES Response:**

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

Guidelines for Community CARES Response
• 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. Sample Critical Incident Management Plan

Prior to Allegation/Incident

- Determine who from Community CARES 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 a Community CARES 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 Community CARES.

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 Community CARES 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 Community CARES

- **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 staff, 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 youth education program to all youths involved with Community CARES 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.