

Model Abuse Prevention Policies & Procedures

Developed By:

PRAESIDIUM

Our Passion. Your Protection.

Indemnity Statement

Praesidium provides Sample Policies and Procedures 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 recommendations 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 SAMPLE POLICIES AND PROCEDURES IN PREVENTING OR REDUCING THE INCIDENCE OF ABUSE**

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Policies

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.

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.

Sample Consumer Code of Conduct

The Code of Conduct for Consumer Participants outlines specific expectations of consumers.

Abuse or Mistreatment

Our organization's top priority is keeping consumer safe. Any form of abuse or mistreatment of consumer, children, employees, and volunteers is prohibited. Consumer shall not abuse or mistreat employees, volunteers, or other consumer in any way. Use of abusive language, obscene or profane language, including racial, religious or sexual references directed at other people will not be tolerated. It is important to treat others as you would like to be treated.

Consumer shall not engage in the verbal or emotional abuse or mistreatment of other consumer, employees, or volunteers.

<i>Appropriate Verbal Interactions for Adolescent and Teenage Consumer</i>	<i>Inappropriate Verbal Interactions for Adolescent and Teenage Consumer</i>
<ul style="list-style-type: none"> • Appropriate jokes • Encouragement • Praise 	<ul style="list-style-type: none"> • Name-calling • Bullying • Ridicule or Humiliation • Discussing sexual encounters • Cursing • Hazing • Off-color or sexual jokes • Shaming • Belittling • Derogatory remarks • Harsh language that may frighten, threaten, or humiliate other consumer • Derogatory remarks about another consumer or his/her family • Inappropriate games like <i>Truth or Dare</i> and <i>Never Have I Ever</i>

Consumers shall not engage in the physical abuse or mistreatment of other consumer, employees, or volunteers.

<i>Appropriate Physical Interactions for Adolescent and Teenage Consumer</i>	<i>Inappropriate Physical Interactions for Adolescent and Teenage Consumer</i>
<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 ▪ Verbal praise ▪ Pats on the head when culturally appropriate ▪ Touching hands, shoulders, and arms ▪ Arms around shoulders 	<ul style="list-style-type: none"> • Full-frontal hugs • Kisses • Showing affection in isolated areas • Lap sitting • Wrestling • Piggyback rides • Tickling • Exposing oneself • Any type of massage given by or to a consumer • Any form of affection that is unwanted by the consumer or the staff or volunteer • Compliments relating to physique or body development • Touching bottom, chest, or genital areas • Hitting • Spanking • Shaking • Slapping • Unnecessary restraints • Viewing or showing others pornographic materials

Personal Relationships

Appropriate personal relationships between consumers are encouraged. However, our organization strongly discourages romantic relationships between consumer participants while in programming. Consumers are not permitted to hold hands, sit on others’ laps, use full-frontal hugs, or kiss other consumer participants while in programming.

There should never be, under any condition, a romantic or otherwise personal relationship between a consumer participant and an employee or volunteer.

One-on-one Interactions

Most abuse occurs when an adult is alone with a consumer, or when a consumer is alone with another 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. If you observe one-on-one interactions between employees and consumer, you should report this to <INSERT NAME OF PROGRAM SUPERVISOR> or call <INSERT NAME OF PROGRAM SUPERVISOR> at <insert telephone number> or the <Anonymous Helpline> at <insert telephone number>.

Electronic Communication

All communication between employees/volunteers and consumer must be approved by a consumer's parents/guardians and must be in an open electronic environment. The "Rule of Three" must be observed in all electronic communications between consumer and employees/volunteers. For example, there should be two employees/volunteers included in on text messages and emails with consumer. Direct, private messaging between consumer and employees/volunteers is not allowed.

Consumer participants will comply with the organization's policies governing the use of personal mobile communication devices. Consumer participants are not permitted to share cell phones with other consumer participants.

Alcohol, Drugs, and Tobacco

Possession and/or use of alcoholic beverages, drugs and tobacco products while at the organization is strictly prohibited. Consumer will not be permitted to participate in any program while under the influence of alcohol, drugs, or illicit substances. Parents/guardians will be notified as appropriate.

Weapons

We want our organization to be a safe place for consumer, children, and families. Weapons and items that may be considered weapons are prohibited. Anyone found to be in possession of such items will be required to leave and the items will be confiscated. This includes laser pointers. Parents/guardians, and/or the authorities will be notified as appropriate.

Violence

Our organization seeks to provide a safe environment for individuals in our community. Violence and threats of violence will not be tolerated at *[insert name of organization]*, on our grounds, in organization facilities, in other facilities being utilized by our organization, or during *[insert name of organization]* sponsored activities and events. Employees are available to assist in the resolution of differences.

Disruptive Behavior

We take pride in the appearance of our organization and we always want to ensure members are safe. Inappropriate or disruptive behavior is not permitted in our organization. This includes, but is not limited to, graffiti, littering, spitting, or throwing objects that could intentionally or unintentionally harm others or cause disorder.

Bullying

Our organization will not tolerate the mistreatment or abuse of one consumer by another consumer. 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:

1. *Physical bullying* – when one person engages in physical force against another person, such as by hitting, punching, pushing, kicking, pinching, or restraining another.
2. *Verbal bullying* – when someone uses their words to hurt another, such as by belittling or calling another hurtful name.
3. *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.
4. *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:
 1. Sending mean, vulgar, or threatening messages or images.
 2. Posting sensitive, private information about another person.
 3. Pretending to be someone else in order to make that person look bad; and
 4. Intentionally excluding someone from an online group.
 5. 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.
 6. 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 consumer, employees, and volunteers.

Reporting

Because our organization is dedicated to maintaining zero tolerance for abuse, it is imperative that everyone, including consumer, actively participates in the protection of consumer. In the event that consumer observe any suspicious or inappropriate behaviors and/or policy violations on the part of other employees, volunteers, or other consumer, 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 any abuse prevention policies outlined by the organization
- Seeking private time or one-on-one time with consumer
- Buying gifts for individual consumer
- Making suggestive comments to consumer
- Picking favorites

Consumer are encouraged to report concerns or complaints about other employees and volunteers, other adults, or consumer to a supervisor who can be reached at [*insert telephone number*] or the [*Anonymous Helpline*] at [*insert telephone number*].

Sample Policy Defining Appropriate and Inappropriate 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>
Contact initiated by the consumer such as: <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 • Wrestling • Piggyback rides • Tickling • Allowing a consumer 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

Sample Policy Defining Appropriate and Inappropriate 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 include but are not limited to:

<i>Appropriate Verbal Interactions</i>	<i>Inappropriate Verbal Interactions</i>
<ul style="list-style-type: none"> • Positive reinforcement • Appropriate jokes • Encouragement • Praise • Strength-based conversations • Self-disclosure as a supervised therapeutic tool by licensed clinicians, medical professionals, and pastoral counseling 	<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 • Oversharing personal history • Derogatory remarks • Harsh language that may frighten, threaten or humiliate consumers • Derogatory remarks about the consumer or his/her family • Compliments relating to physique or body development

Sample Policy for Managing One-on-One Interactions Between Employees, Volunteers, and Consumers

[Decide whether one-on-one is permissible in this organization or specific programs and define that expectation].

One-on-one interactions may occur as part of this organization's programming under authorized circumstances. The purpose of this policy is to ensure the organization clearly communicates expectations for employees and volunteers and gives examples of appropriate behavior when one-on-one interactions may occur. In those situations where one-on-one interactions are authorized, employees and volunteers should observe the following guidelines to limit the risk of abuse or false allegations of abuse:

- Meet consumers in a public place where you are in full view of others.
- Avoid physical affection during one-on-one interactions. If unavoidable, ensure physical and verbal interactions align with this organizations established policies and are limited to the task at hand.
- 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 encourage them to randomly drop in or pass by the interaction.
- To the extent possible, ensure one-on-one interactions occurring behind closed doors are scheduled in advance or are communicated with the supervisor.
- Ensure one-one-one interactions are documented, especially if behind closed doors. Keep documentation of these meetings (such as in shared calendar, case notes, etc.).
- 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.

Sample Policy for Managing Interactions between Employees, Volunteers, and Consumers Outside the Organization

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].

Option One:

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

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)

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/guardians 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.

Sample Electronic Communication and Social Media Policy

[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].

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.

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 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/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 a 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/guardians may request in writing that a consumer not be contacted through any form of electronic communication or social media by the organization.

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, and parents/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** _____

Sample Gift-Giving and Gift Acceptance Policy

[Offenders routinely groom consumers by giving gifts, thereby endearing themselves to the consumers. They might instruct the consumers to keep the gifts a secret, which then encourages keeping other bigger or more harmful secrets from trusted adults.]

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

Option One:

This organization prohibits employees and volunteers from giving to, or receiving gifts from, consumers.

Option Two:

This organization strongly encourages employees and volunteers to refrain from exchanging gifts with consumers. However, gifts to consumers may be given under the following circumstances:

1. Gift requests must be submitted to a supervisor and/or a designated administrator prior to being purchased;
2. The supervisor and/or designated administrator will determine a cost limit regarding how much can be spent on the gift; and,
3. Parents/guardians of the consumers must be notified about the gift item and why the consumers are receiving the gift.
4. Employees and volunteers are prohibited from giving gifts to individual consumers except when the gift is authorized by a supervisor or designated administrator and given to all consumers (i.e., celebration of special events/holidays or group recognition).
5. Require employees and volunteers to communicate that the gift is given on behalf of the organization not the individual employee or volunteer.

Option Two Example:

Sometimes it may be difficult to refuse gifts from consumers or their families. In many cultures, people give gifts to reflect their appreciation for people or services. In order to be respectful of consumers and their families, the organization makes reasonable allowances for acts of gratitude involving small gifts of appreciation from consumers and/or their families that have a monetary value not exceeding *[the organization will need to set a monetary or in kind amount such as \$10.00]*. Employees and volunteers must disclose all such gifts to their immediate supervisor and/or a designated administrator. Under no circumstances can money be accepted from consumers or their families as a gift.

This gift acceptance policy should be included within materials given to parents/guardians and consumers; however, if a parent or consumer approaches an employee or volunteer with a gift that exceeds *[the organization will need to set a monetary or in kind amount such as \$10.00]*, the employee or volunteer should politely decline the gift and refer to this particular policy. The employee or volunteer can also encourage the parent or consumer to speak with an immediate supervisor and/or a designated administrator if they have any questions.

Artwork and letters of appreciation written by consumers for employees or volunteers may only be accepted if these items will be displayed in a public area at the organization. Employees and volunteers may not take consumer artwork or letters away from the organization whether to their personal homes or any other location.

Sample Policy Governing Mandatory Reporting Requirements for Employees and Volunteers

All employees and volunteers must follow state specific mandatory reporting requirements.

Employees and volunteers must be trained to be aware of and understand their legal and ethical obligation to recognize and report suspicions of mistreatment and abuse. Employees and volunteers will:

1. be familiar with the symptoms of abuse and neglect, including physical, sexual, verbal, and emotional abuse;
2. know and follow organization policies and procedures that protect against abuse;
3. report suspected abuse or neglect to the appropriate authorities as required by state mandated reporter laws; and
4. follow up to ensure that appropriate action has been taken.

Employees and volunteers will read and sign the Code of Conduct documenting employee's or volunteer's understanding of the legal and ethical duty to report suspected mistreatment or abuse.

For a complete list of each state's mandated reporting requirements and contact information, please see the *US Department of Health & Human Services* guidelines for reporting abuse:

<https://www.childwelfare.gov/topics/can/>

Additionally, refer when applicable to your state's adult protective services and elder abuse reporting agencies:

<https://www.hhs.gov/answers/programs-for-families-and-children/how-do-i-report-elder-abuse/index.html>

Sample Policy Requiring Cooperation with Investigations

THIS POLICY CONTAINS MODEL LANGUAGE BUT SHOULD BE REVIEWED BY LEGAL COUNSEL PRIOR TO USE TO ENSURE COMPLIANCE WITH LOCAL, STATE, AND FEDERAL LAW

This organization takes every allegation of abuse or misconduct seriously and will fully cooperate with the authorities to investigate all cases of alleged abuse or misconduct. Employees and volunteers shall cooperate with any external investigation by outside authorities or internal investigation conducted by the organization or persons given investigative authority by the organization.

Cooperation with investigations includes, but is not limited to:

- Promptly acknowledging and responding to requests for information;
- Making oneself available for meetings with investigating officials;
- Providing full, accurate, and truthful information;
- Keeping confidential information learned or transmitted during the investigation, unless directed by legal authorities, and
- Preserving relevant information and documents.

An employee or volunteer's failure to cooperate with an investigation will result in disciplinary action up to and including termination of employment or dismissal from the organization.

Monitoring and Supervision

Sample Employee, Volunteer, and Visitor Identification Badge Policy

Employees and Volunteers

Every employee and volunteer of this organization is required to wear an identification badge *[for purposes of brevity, this policy uses the word badge. Substitute other identifying item utilized by your organization such as a lanyard, wristband, or nametag.]* at all times while present at the organization's facility unless the organization determines that identification presents a safety risk to the employee or volunteer, or to the consumer(s). The identification badge must be worn on the person's clothing at or above the waist level and in such a fashion to be clearly visible to other employees, volunteers, and security personnel at all time.

When an employee or volunteer, whom the guard *[could also be security or your receptionist, change language to reflect your organization's individual charged with checking badges/IDs. For purposes of brevity we refer to that person as guard]* does not recognize, arrives at the facility without an appropriate identification badge, the guard will assist that person as provided in subparts (a) and (b) below.

a) A person without a badge shall present photo identification to the guard. The guard will check the name against the current employee or volunteer roster and, if the identification is verified, the guard will require the person to sign in and then issue a temporary "Employee" identification badge.

If the guard is unable to verify employment or volunteerism, the guard will contact the person's department or office by phone to seek verification. If employment or volunteerism is verified, the guard will require the person to sign in and then issue a temporary identification badge. If employment or volunteerism cannot be verified, the person will be denied access.

a) Employees or volunteers without badges, but who are known by the guard, will be required to sign in and then be issued a temporary "Employee" badge, which they must return at the end of the workday.

Visitors

When a visitor arrives at the facility without an authorized identification badge, he or she will be received by a guard who will offer assistance. The guard shall verify a visitor's identity by inspection of a form of photograph identification, when applicable. The guard will request that the individual sign in, issue the person a "Visitor" identification badge, and notify the department or office that the visitor has arrived. The "Visitor" shall wait at the guard area for a representative to escort the visitor to the department or office. A department or office representative must escort the visitor back to the guard to return the badge prior to the visitor's departure. Visitors are required to wear a temporary "Visitor" identification badge at all times while in the facility.

Identification in Programming Away from the Facility

Our employees and volunteers wear organization attire or photo ID badges that clearly distinguish them as authorized representatives when visiting consumers at residential placement, going to appointments with consumers, or when they are in other places where being identifiable is necessary. With approval from a supervisor, employees and volunteers may choose to not wear identifiable attire or badges when meeting with consumers in the community or public places.

Sample Procedures for Supervisors and Administrators Monitoring Employees and Volunteers at On-Site Programs.

Our supervisors and administrators use scheduled and random observations of all programs, program locations and buildings; engage in spontaneous and scheduled conversations with employees, volunteers and consumers; conduct group and individual supervision and training meetings; and review program documentation, to ensure that safety standards are always in place.

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 and volunteers 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 and volunteers. Check punctuality and the routine that employees and volunteers 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 and volunteers actively involved? Ask to see the schedule of activities and compare with what is happening on at a given time.

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

Observe employees and volunteers' interaction with consumers.

- Do employees and volunteers use the proper voice tone with consumers?
- Do employees and volunteers give praise to consumers?
- Do employees and volunteers follow the physical affection guidelines?
- Do employees and volunteers know the consumers by first and last name?
- Do employees and volunteers sound enthusiastic?
- Do employees and volunteers set limits and boundaries with consumers?
- Do employees and volunteers interact with all consumers?
- Do employees and volunteers pay undue attention to any consumers?

- Do employees and volunteers listen to the consumers when they make reports or express concerns?

Observe employees and volunteers' interactions with each other.

- Do employees and volunteers pay more attention to the consumers than to each other?
- Are employees and volunteers spread out and monitoring the entire facility?
- Do employees and volunteers know who is supervising which consumers?
- Do employees and volunteers communicate to each other when one must leave the area?
- Do employees and volunteers use polite voice tones with one another?
- Do employees and volunteers share responsibilities around the program?

Observe employees and volunteers' interactions with parents/guardians.

- Do employees and volunteers greet the parents/guardians?
- Do employees and volunteers know the parents/guardians by name?
- Do employees and volunteers provide adequate information to the parents/guardians?
- Do employees and volunteers ask the parents if they have any questions?
- Do employees and volunteers spend too much time with any particular parent/guardian?

Ask parents/guardians questions, such as:

- Are you satisfied with the care your child is receiving here?
- What can we do to make it better?
- Does your child ever say anything about his or her (title of employees and volunteers)?
- Have employees and volunteers ever contacted you or your child about anything other than the program?
- Do you ever have a chance to observe your child at the program?
- What does your child say about the time he/she spends here?

Ask employees and volunteers how they would respond to "what if" situations that you describe, such as:

- A consumer is not picked up by a parent/guardians at the end of the program
- Another employee or volunteer shakes a consumer for hitting another consumer

- A parent/guardian confides in you that he/she thinks one of the employees or volunteers does not have appropriate boundaries with consumers

Sample Procedures for Supervisors and Administrators Monitoring Employees and Volunteers at Off-Site Programs.

Off-site activities and programs present unique risks for the safety of consumers and are among the most common settings where adult-to-consumer and consumer-to-consumer sexual misconduct occurs. Some of the special circumstances which cause these to be high-risk environments are that large groups are difficult to monitor, consumers may be more likely to act out in a less structured environment, organizations cannot screen all other adults who may have access to consumers off-site, and many off-site programs (like community-based care) include one-on-one interactions. It is important that supervisors and administrators are aware of these risks and take measures to minimize them through effective monitoring and supervision practices.

Our supervisors and administrators use scheduled and random observations of all off-site activities and programs; engage in spontaneous and scheduled conversations with employees, volunteers, consumers, and other stakeholders; conduct group and individual supervision and training meetings before and after offsite activities or programs; and review relevant program documentation and records, to ensure that safety standards are always in place.

Supervisors and administrators are encouraged to adhere to the following guidelines:

Keep a record. Supervisors must approve all off-site and overnight activities, programs, or outings. Document your supervision observations and program visits. Include information like your arrival and departure times, which consumers and parent/guardians were present, and a summary of the information gathered. Provide employees and volunteers with feedback about visits.

Survey the physical environment. Is this a safe and suitable location to take consumers and for the activity (e.g. size of area for number of consumers, ability to supervise all areas used by consumers)?

Watch activities. Are the employees and volunteers actively involved? Ask to see the schedule of activities and compare with what is happening on at a given time.

Observe bathroom and locker room activities. Observe bathroom and locker room activities to ensure that the employees and volunteers are complying with the established policies and procedures even when off-site.

Observe employees and volunteers' interaction with consumers.

- Do employees and volunteers use the proper voice tone with consumers?
- Do employees and volunteers give praise to consumers?
- Do employees and volunteers follow the physical affection guidelines?
- Do employees and volunteers know the consumers by first and last name?
- Do employees and volunteers sound enthusiastic?

- Do employees and volunteers set limits and boundaries with consumers?
- Do employees and volunteers interact with all consumers?
- Does an employee or volunteer pay undue attention to any consumers?
- Do employees and volunteers listen to the consumers when they make reports or express concerns?

Observe employees and volunteers' interactions with each other.

- Do employees and volunteers pay more attention to the consumers than to each other?
- Are employees and volunteers spread out and monitoring the entire location or facility?
- Do employees and volunteers know who is supervising which consumers?
- Do employees and volunteers communicate to each other when one must leave the area?
- Do employees and volunteers use polite voice tones with one another?
- Do employees and volunteers share responsibilities around the program?

Consider specific monitoring and supervision recommendations based on the location and type of activity (for example, restaurant, amusement park, water park, arcade, sporting event, etc.). If the offsite activity or program is held at a location where consumers will be interacting in a large space and/or it is not possible to assign specific employees and volunteers to specific groups of consumers, then:

- Set boundaries at the location. Tell consumers where they may and may not go. Then post employees and volunteers around the boundaries and at the entrance and exit points.
- Assign remaining employees and volunteers to monitor specific areas. Post at least one employee or volunteer near the bathrooms.
- Ensure consumers should check in at designated meeting points at least once every hour.

Sample Policy Requiring Programs to Adhere to Specific Adult-to-Consumer Ratios.

Specific -to-consumer ratios help define the level of supervision necessary to be effective and safe. Ratios also enable employees, volunteers, and supervisors to easily identify when additional personnel are necessary. This organization will ensure all programs adhere to the following specific -to-consumer ratios:

[Ratios will be well established, known, and followed consistently by all employees and volunteers. Programs governed by external regulations will follow required ratios from their governing bodies or lower ratios as required by our organization. Criteria to consider when setting ratios are: external legal or regulatory agency standards, age, program type, location/facility, high risk activity, and age of employees/volunteers charged with supervising consumers. Supervisors will consistently supervise programs to ensure ratios are followed and follow up with employees and volunteers if ratios are not followed. Ratios will vary depending on the age of consumers in the program and employees and volunteers will always follow the lowest possible ratio when working with mixed-age groups.]

[Insert organization ratios for different types of programs here:]

Sample Monitoring Guidelines when Consumers Enter and Exit Programs

Standard procedures for monitoring consumers help organizations identify who is present in programming and allow employees and volunteers to document when and with whom consumers exit programming. Such procedures allow employees to quickly identify any consumer who may be missing and decrease opportunities for consumers to be left unsupervised.

Guidelines for monitoring consumer entry/exit from facilities or programming include:

- The organization will have a procedure defining expectations for consumer sign in/out of programming.
- When possible, create a single point of entry and exit in the facility or program.
- If there is more than one entrance or exit, ensure these other points of access are consistently monitored.
- Consumers must check in with the front desk, or with the employee/volunteer they are meeting at the facility or program.
- Utilize headcounts or conduct attendance checks to ensure continuous awareness of which consumers are in programming.
- Maintain written or electronic documentation of attendance in programming.

Sample Guidelines for Monitoring and Supervising Consumer-to-Consumer Interactions

Employees and volunteers must effectively monitor and supervise consumer-to-consumer interactions to prevent consumer-to-consumer inappropriate behaviors and abuse. When supervising consumers, it is important to remember that adult employee and volunteer behavior sets the tone, and consumers should not determine what is and is not acceptable behavior.

Employees and volunteers should ensure:

1. Consumer interactions are age and developmentally appropriate.
2. Consumers respect each other's boundaries.
3. Consumers are not bullying, teasing, dominating, or displaying sexualized behaviors toward others.
4. Consumers solve problems without fighting.

Employees and volunteers will utilize monitoring and supervision best practices such as line of sight supervision, zone monitoring and listening and observing for inappropriate behaviors between consumers. Using these methods, employees and volunteers consistently monitor high-risk areas where sexual behavior between consumers is most likely to occur including:

For children and youth consumers:

1. Naptime/Sleeping areas
 - Employees, volunteers, and consumers should not sit or lie on anyone's bed or be in anyone else's sleeping bag
 - Encourage consumers to draw an imaginary line around their sleeping space and encourage them to report violations to an employee or volunteer.
 - Employees and volunteers will not leave consumers alone during nap time
 - Do not let consumers share a sleeping mat, blanket, or sleeping bag.
 - Pay attention to who is sleeping next to whom.
 - Arrange sleeping areas with as much space as possible between each consumer.
 - Do not let consumers nap in areas not visible to employees and volunteers.
 - Keep the room sufficiently lit so that you can easily observe all consumers.

2. Playgrounds/Recreational Spaces

- If the space is too large or has obstructions, such as a building corner or a tool shed, limit the play area to where you can see.
- If you are working with a colleague, make sure you each know the area or which consumer you are watching.
- Don't get distracted visiting with each other or looking at your phone.
- Do not permit consumers to play "Truth or Dare" or "Spin the Bottle."

For consumers of all ages (when possible):

1. Bathrooms and locker rooms

- Require frequent supervision of consumers in locker rooms. If visual supervision compromises consumer privacy or is otherwise not feasible, ensure auditory supervision in/near the locker room.
- Make it a point to walk through the locker room and let your presence be known, make noise, say hello, or sing a song.
- Enter the locker room with consumers or let them know you are standing outside the door waiting for them.
- Limit the number of consumers who enter to the same number of stalls or urinals.
- Use the "Rule of Three," where you send three or more consumers as a group. The consumers stand outside the door while each consumer uses the bathroom, one-at-a-time.
- Require consumers to ask permission prior to leaving program space to use the restroom (if age appropriate).

2. Secluded areas

- Lock doors to unused or seldom used rooms and spaces.
- Use signage to deter consumers from trying to access secluded areas.
- Ensure employees and volunteers frequently monitor secluded areas like stairwells and hallways.

For adult consumers:

Adult consumers (i.e., individuals with disabilities, those experiencing homelessness, or other adult participants in general programming) also require effective monitoring and supervision practices to prevent inappropriate consumer-to-consumer interactions. Employees and volunteers should provide line of sight supervision, structured or guided activities, designated or authorized program areas they may access, and observations of red-flag or inappropriate behaviors to deter and intervene on inappropriate adult consumer interactions.

Sample Guidelines for Monitoring Consumers in Facilities

Generally, Praesidium recommends that consumers under the age of 12 should not be alone in the facility without a parent/guardian present. After the age of 12, most consumers have participated in activities without immediate parental/guardian supervision. In addition, most 12-year-old consumers can use physical or verbal self-protection skills in the event that they are approached inappropriately by another consumer or by an adult.

However, each program is responsible for all consumers in the facility, including vulnerable adults, and the specific needs for each population (youth, adolescents, teens, and vulnerable adults) vary. Although vulnerable adults may not need constant supervision, employees and volunteers should have some form of awareness and guidance as to where consumers are and what activities they are engaged in. Praesidium also recognizes that many consumer programs are compelled to permit younger children to access the facilities for many reasons. Therefore, we recommend implementing the following practices:

1. Require a parent or legal guardian to complete a membership application which includes identifying information, any special medical or behavioral circumstances, any legal indemnifications, any applicable plan of support for the consumer, 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 consumers 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 program's policies 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 program expectations and requirements, as well as any applicable plan of support the consumer may have in place; it also provides an opportunity to establish a relationship with the parents/guardians. This can be helpful if any problems arise in the future.
4. While in the facilities, 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 for consumers. 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 best practices for the authorized areas. For example:
- Determine how frequently authorized areas should be monitored by employees.
 - Assign employee and volunteer-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 consumers can easily recognize them as employees.
7. Train all employees:
- 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.
 - To be aware that free and unstructured activities can include transitional times, such as waiting for transportation.
 - To be aware of the risks involved with mixing age groups and developmental levels and how to monitor activities involving mixed levels – including increasing supervision when necessary.
 - 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, consumers must be supervised at all times, regardless of age or developmental level. The key is to remember that consumers can be supervised directly in structured activities and indirectly when they are in authorized areas.

Sample Policy Addressing Employee and Volunteer Cell Phone Use During Program Hours

Employees and volunteers may bring personal electronic communication devices to work but these devices must not be in view or in use when the individual is expected to be supervising consumers. Program leadership may establish exceptions to this requirement include during approved breaks and/or emergency situations. Internet use, text messaging, and/or emailing consumers is subject to the requirements defined in this organization's electronic communication and social media policy. Failure to adhere to the policy will result in progressive discipline.

Acceptable Use of Cell Phones during Program Hours

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

1. Field Trips
2. Off-site Programs
3. Emergencies

[The organization should also consider whether and to what extent it allows employees and volunteers to take pictures of consumers for programming purposes on their personal devices and/or define parameters on using organization owned devices to take pictures of consumers.]

Sample Guidelines for Supervising Off-Site Activities

Off-site activities, field trips, and outings present unique risks for the safety of consumers and are among the most common settings where adult-to-consumer and consumer-to-consumer sexual misconduct occurs. Some of the special circumstances which cause these to be high-risk environments are that large groups are difficult to monitor, consumers may be more likely to act out in a less structured environment, and organizations cannot screen all other adults who may have access to consumers off-site. It is important that employees and volunteers are aware of these risks and take measures to minimize them.

Special guidelines for off-site activities, field trips, and outings include:

- Visit the destination in advance, when possible, to assist with planning.
- Require prior supervisor approval for all off-site activities.
- Require written parental/guardian approval by disseminating permission slips, including rules for consumers to follow, prior to each off-site activity. Employees and volunteers should keep permission slips on hand during the activity.
- Determine appropriate employee/volunteer-to-consumer ratios before the activity and schedule employees and volunteers accordingly. Considerations for ratios should include:
 - age and number of consumers involved
 - special or unique consumer needs
 - the nature of the activity
- Require employees, volunteers, and consumers to be easily identifiable (using lanyards, badges, shirts, etc.).
- Review rules and boundaries with consumers prior to the activity, including how to report concerns.
- Assign each employee or volunteer to a specific group of consumers to supervise. Groups should be separated according to age, gender, and/or behavior of consumers.
- Train employees and volunteers on active supervision techniques:
 - Position themselves to be able to see and hear all consumers to whom they are assigned.
 - Anticipate what consumers will do and redirect when necessary.
 - Listen and notice changes in sound or absence of sound.
 - Remain engaged with consumers rather than socializing with other employees or volunteers.

- Each employee or volunteer must maintain a roll sheet listing all the consumers in his or her group. Name-to-face roll checks should be conducted routinely and whenever moving from one activity or space to another.
- Specific bathroom and locker room procedures for employees and volunteers to follow, as applicable to the outing, ensuring minimum ratios can be maintained at all times. Transportation procedures.
- A means for employees and volunteers to communicate with each other while off-site.
- Prohibit employees and volunteers from using cell phones for personal business while supervising consumers.
- An emergency plan for responding to incidents.
- Instructions for documentation including the purpose of the activity, duration, location, and other critical information.
- Instructions for a supervisor to observe the off-site activities at scheduled times and random intervals.
- Consider utilizing a shared calendar for awareness among teams for various community or home-based service deliveries.
- Consider specific recommendations based on the location and type of activity (for example, amusement parks, water parks, arcades, etc.). If the trip is to a location where consumers will be interacting in a large space and/or it is not possible to assign specific employees and volunteers to specific groups of consumers, then:
 - Set boundaries at the location. Tell consumers where they may and may not go. Then post employees and volunteers around the boundaries and at the entrance and exit points.
 - Assign remaining employees and volunteers to monitor specific areas. Post at least one employee or volunteer near the bathrooms.
 - Consumers should check in at designated meeting points at least once every hour.

Sample Procedures for Monitoring Mentoring Relationships

In addition to screening and training mentors, our organization follows these supervision procedures:

- Requiring supervisors to contact mentors at least once a month to monitor progress, safety, check in about goals, and to provide support for mentors. Face-to-face meetings are required.
- Requiring supervisors to contact consumers once a month and their families once a month. Face-to-face meetings are required.
- Requiring mentors to maintain a weekly log documenting all activity with the consumers. This log is reviewed and signed by supervisors bi-monthly at a minimum.
- Requiring family members and consumers to review and confirm records of contact and activities as reported by the mentor.
- Requiring supervisors to ask consumers questions relevant to the detection of improper conduct or policy violations on a monthly basis.
- Requiring that a supervisor must interview the consumer and interview the family to discuss the mentoring relationship at the end of a mentoring relationship. These interviews should include questions that assess abuse risk.
- Requiring that the organization provides community partners (schools, recreation centers, etc.) with information about what is appropriate and inappropriate in the mentoring program so that the community partners can assist in the monitoring of the match.

Sample Procedure for Monitoring & Supervising Aquatic Programs

Aquatics programs are considered “high risk” as they can quickly provide opportunity for both adult-to-consumer abuse as well as consumer-to-consumer abuse. Consider the following factors and how they play a role in your aquatics program:

- **Easy access to consumers.** With many aquatics’ programs, there are many consumers in one shared space.
- **Lack of supervision.** Often, there is less parent/guardian supervision during these programs.
- **Public access.** Many aquatics program facilities do not require sign-in or out and it is relatively easy to drop into programming.
- **Partial nudity.** Employees and consumers alike are partially clothed.
- **Ease of contact.** There is the possibility for inappropriate interactions in aquatic programs.
- **Perception of a relaxed environment.** Consumers and adults may perceive there is less supervision and more opportunities for inappropriate behavior.

In order to ensure efficient monitoring and supervision of aquatics programs, and in addition to training our employees, our organization follows supervision procedures in the below areas:

- 1) Monitoring for suspicious or inappropriate behavior in the water
- 2) Monitoring locker rooms, changing areas, and bathrooms
- 3) Monitoring during swim lessons
- 4) Monitoring the pool deck and any lounge areas

1) Monitoring for Suspicious or Inappropriate Behavior in the Water:

It is important to watch for, and respond to, these red flag behaviors in adults:

- Violating your organization’s policies regarding appropriate and inappropriate physical interactions with consumers (for example, piggyback rides in the water, allowing consumers to hang on them in the water, etc.)
- Loitering during consumer-only lessons or activities

- Watching a consumer or group of consumers for an extended period
- Inappropriate sexual behavior and/or activity by an adult

It is important to watch for, and respond to, these red flag behaviors in consumers:

- Seeking out unsupervised areas
- Inappropriate physical contact with other consumers (i.e. horseplay, “chicken fights,” and dunking)
- Consumers who appear to be uncomfortable with attention they are receiving from an adult or another consumer
- Inappropriate physical contact out of view (i.e. under water or in a slide)

2) Monitoring Locker Rooms, Changing Areas, and Bathrooms

Refer to established organization policies and procedures for monitoring locker rooms, changing areas, and bathrooms.

- Identify the unique high-risk areas of these locations in your organization that might be accessible for aquatics programs.
- Develop a schedule for consistent locker room, changing area, and bathroom monitoring which includes specific instructions for monitoring the high-risk areas. The schedule should appear to be “random” so that people in the locker room know that someone from the organizations could enter at any time.
- Create a system to ensure locker room checks are consistently completed.
- Train employees on how to recognize suspicious or inappropriate behavior in locker rooms, changing areas, and bathrooms, including:

Adults:

- Loitering in the locker room
- Watching/staring at consumers in the locker room
- Making inappropriate comments to the consumers in the locker room

Consumers:

- Consumers seeking out unsupervised areas
- Mixed age groups of consumers

- Making inappropriate comments to other consumers in locker rooms, changing areas, and bathrooms.

3) Monitoring During Swim Lessons

- Ensure instructors teach swim lessons in open, viewable swim areas under the supervision of other employees.
- Monitor for interactions with consumers that are following your organization's guidelines for appropriate and inappropriate physical interactions.
- Require instructors, when possible, to keep their hands above water and visible to others.
- Require instructors, when assisting a child during the lessons, to explain out loud where they will touch the child – "I am going to put my hand under your back to help you float."
- When possible, encourage parents/guardians to observe swim lessons.

4) Monitoring the pool deck and any lounge areas

- Ensure all entrances and exits to the pool deck are appropriately and regularly monitored.
- Designate specific employees responsible for monitoring the pool deck and lounge areas (other than lifeguards). Active supervision of these areas is always critical.
- Monitor consumers to ensure they are following your organization's guidelines for appropriate interactions (including physical interactions, verbal interactions and electronic communications).
- Have a plan of action for responding to any deck changing (individuals changing on the pool deck and not in the appropriate locker room or changing area).

Sample Procedures for Monitoring and Supervising Youth Sports Programs

To ensure safety and quality in the various youth sports programs, practices must be monitored and evaluated by a full-time employee who is familiar with policies and procedures.

Keep a record. Document your supervision visits. Include information like your arrival and departure times, which youth 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 youth to arrive.

Survey the physical environment. Is this a suitable location for the activity (e.g. size of area for number of youths, ability to supervise all areas used by youth, 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 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.

Observe employee interactions with youth.

- *Do employees use the proper voice tone with youth?*
- *Do employees give praise to youth?*
- *Do employees follow the physical affection guidelines?*
- *Do employees know the youth by first and last name?*
- *Do employees sound enthusiastic?*
- *Do employees set limits and boundaries with youth?*
- *Do employees interact with all the youth?*
- *Do any employees pay undue attention to any youth?*
- *Do employees listen to the youth when they make reports or express concerns?*
- *Do employees exhibit inappropriate power dynamics with certain youth?*

- *Are employees aware of and actively supervising high-risk situations (i.e. mixed-age groups, off-site events, isolated areas)?*
- *Are employees prepared for and following organization procedures for transportation? Overnight trips? Large group activities? Free time?*

Observe employee interactions with each other.

- *Do employees pay more attention to the youth than to each other?*
- *Are employees spread out and monitoring the entire facility?*
- *Do employees know who is supervising which youth?*
- *Do employees communicate to each other when one must leave the area?*
- *Do employees use polite voice tones with one another?*
- *Do employees share responsibilities around the program?*
- *Do employees have stress management methods that they implement appropriately?*

Observe employee interactions with parents/guardians.

- *Do employees greet the parents/guardians?*
- *Do employees know the parents/guardians by name?*
- *Do employees provide adequate information to the parents/guardians?*
- *Do employees ask the parents/guardians if they have any questions?*
- *Do employees spend too much time with any parent/guardian?*

Take youth aside (but stay within view) and ask them questions, such as:

- *How do you like coming here?*
- *What kinds of things do you do when you are here?*
- *Is the (title of employees) nice to you?*
- *Have you ever gotten hurt here?*
- *Has anyone ever been mean to you here?*
- *Do you feel that your coach treats you and all other youth fairly?*

Ask parents/guardian questions, such as:

- *Are you satisfied with the care your youth is receiving here?*
- *What can we do to make it better?*

- *Does your youth ever say anything about his or her (title of employees)?*
- *Have employees ever contacted you or your youth about anything other than the program?*
- *Do you ever have a chance to observe your youth at the program?*
- *What does your youth say about the time he/she spends here?*

Sample Guidelines for Supervising Overnight and Residential Settings

Overnight activities and residential settings can present unique risks to consumers and employees and volunteers. Overnight and residential settings often involve changing clothes; consumers of different ages interacting in a more intimate atmosphere than regular program activities; more unstructured and novel activities; and increased opportunities for a consumer to avoid supervision and for employees and volunteers to be distracted.

Supervision Guidelines for Overnight Activities

- All overnight activities must be documented and approved in writing by the Program Director or Supervisor. Include a written/structured schedule of events.
- Administrators are expected to regularly and randomly observe overnight activities on a scheduled and periodic basis.
- The Program Director or Supervisor should appoint a “lead” employee to supervise the overnight activity. A meeting with all employees should be conducted to discuss the unique risks of overnight trips, unique elements of the specific overnight trip, and to review the specific policies and procedures that apply to the overnight activity.
- Provide parents/guardians with written information about the overnight activity. Information should include the location, duration, and type of activities to take place during the overnight. All parents/guardians must sign a permission slip for their consumers to attend the overnight activity.
- Determine the appropriate employee-to-consumer ratios before the event and schedule employees accordingly. Consider increasing the employees needed for supervision depending on the overnight activity details.
- Meetings with the group should be hosted in open and observable areas; meetings should not be hosted in employees or consumer rooms.

Overnight Activities at a Facility

- Authorized areas within the facility must be clearly defined and explained to the consumers.
- Assign each employee to a specific group of consumers to supervise. Each employee should then maintain a roll sheet that lists consumers in his or her group. Head counts and roll checks should be conducted routinely throughout the overnight activity.
- 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”.

- With regards to sleeping arrangements, separate the male and female consumer 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.
- When performing room checks, employees should always go in pairs.
- For overnight activities where sleeping is not part of the activity (i.e. a lock-in), require at least three employees to stay awake overnight.

Overnight Activities Away from the Facility

- Overnight stays at private homes are prohibited unless approved by the administration.
- Physical boundaries at the off-site location must be clearly defined and explained to the consumer.
- Assign each employee to a specific group of consumers to supervise. Each employee should then maintain a roll sheet that lists the consumers in his or her group. Head counts and roll checks should be conducted routinely throughout the event.
- 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).
- In hotel rooms, assign consumers to rooms based on gender and age. Employees should not share rooms with consumers. If employees must share rooms with consumers, employees must have their own beds and never change in front of consumers.
- 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.
- Include structured guidelines for conducting overnight room checks.

Residential Settings

- Require employees/caregivers to remain awake as long as consumers are awake and/or enact 24/7 “awake-night supervision” procedures as required by licensing or external regulations.
- Specify adult-to-consumer ratios for awake and overnight hour timeframes.
- Develop a written/structured schedule of events.
- Develop structured guidelines for conducting overnight room checks, including the documentation of these conducted checks.

- Require supervisors to observe overnight shifts regularly and randomly on a scheduled and periodic basis.
- Supervisors will monitor video surveillance regularly in real-time, especially during high-risk times or activities (if available).

Sample Policies and Procedures for Teen Leadership Programs

1. Define the Teen Leadership Program.

- i. What is the goal of the program?

For example, is the program designed for older youth who desire to become counselors, or is it designed for youth 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/guardians, teachers, counselors, and/or coaches.
- Interview the teen leaders.
- Include the teens' parents/guardians 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 employee 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.

Sample Procedures for Monitoring Cabin and Sleeping Areas

Procedures for Monitoring Cabin and Sleeping Areas:

- Specify employee-to-consumer ratios for cabins.
- Identify blind spots in the cabins.
- Address daytime cabin monitoring – even while consumers participate in other activities.
- Address campers returning to the cabins to change or use the restrooms throughout the day.
- Address overnight supervision of the campers in the cabins.
- When possible, assign counselors different times to shower and change.

Sample Procedures for Monitoring Night Games and Evening Events

Procedures for Monitoring Night Games and Evening Events:

- Where possible, require age groups to be separated.
- Assign counselors to supervise specific areas during both night games and the transition time before the activity begins.
- Require counselors to conduct randomly scheduled head counts. For example, at some point during the night game, each counselor should formally ascertain that all of his or her campers are present. During some activities, consider stopping the game to make sure that all campers are present.
- Designate specific counselors to monitor the restrooms and access to cabins or sleeping areas during night games and activities.

Sample Procedures for Monitoring Off-Site Camping

Procedures for Monitoring Off-Site Camping:

- Require a director's prior approval for all overnight activities.
- Require employees to remain awake as long as consumers are awake.
- Specify employee-to-consumer ratios.
- Define narrow geographic boundaries for the camping activity.
- Include a written/structured schedule of events.
- Include bathroom procedures.
- Require separating the male and female sleeping areas.
- Require roll call periodically throughout the activity.
- Require directors to regularly and randomly observe overnights on a scheduled and periodic basis.
- If transportation is necessary, follow the camp's transportation procedures.

Sample Guidelines for Supervising and Monitoring Bathroom and Shower Procedures

Bathrooms are high risk locations for sexual activity between consumers, and adult offenders can use the privacy afforded in bathrooms and during shower time to abuse a consumer. Consequently, bathrooms and shower time require close monitoring, and these practices must be carefully managed. Shower time also present increased risk, because consumer may be nude or partially nude and consumers may engage in horseplay.

When supervising bathroom use, adult employees and volunteers should first quickly scan the bathroom before allowing consumers to enter to ensure the bathroom is vacant.

For Group Bathroom Breaks:

- Require employee and volunteers 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 bathroom while the others wait outside with the employee or volunteer.
- If there are multiple stalls, only send in as many consumers as there are stalls available for use.
- Minimize consumers of different ages using the bathroom at the same time.
- Require employee to stand outside the bathroom door but remain within earshot.

For single use restrooms:

- Require consumers to ask permission to use the bathroom.
- Require all employee to frequently check bathrooms.
- Require all managers and/or on-duty supervisors to frequently check bathrooms and ensure employee are monitoring bathrooms correctly and at the established intervals.

For shower time:

- Only one consumer can be in a shower stall at any given time.
- If there are multiple stalls, only send in as many consumers as there are stalls.
- Ensure shower doors/curtains do not extend all the way to the ground so employee and volunteers can easily glance into the bathroom to see how many feet are in each shower stall.
- Require employee and volunteers to stand outside the shower area but remain within earshot.
- Prohibit employees and volunteers from using the bathroom at the same time as consumers.

- When necessary to assist young consumers in the stalls, employees and/or volunteers should keep the door to the stall open.
- Consumers who require assistance with personal care activities should have this noted within their file and include the level of assistance necessary.
- Employees and volunteers who are authorized to provide assistance with personal care activities need specific training on appropriate diapering and toileting procedures.

Sample Guidelines for Supervising and Monitoring Locker Rooms and Changing Areas

Locker rooms and changing areas are high-risk locations for sexual activity between consumers, and adult offenders can use the privacy afforded in locker rooms to abuse a consumer. Consequently, locker rooms require close and regular monitoring, and these practices must be carefully managed. Locker rooms also present increased risk, because consumers and adults may be nude or partially nude and consumers may engage in horseplay.

Our locker room and changing areas procedures:

- Require employees and volunteers to stand within earshot of locker room when in use by consumers.
- Require employees to intermittently and briefly check inside the locker room so users know the locker room is monitored.
- Encourage employees to provide consumers with a strict time limit of how long they can be in the locker room to limit opportunity for inappropriate interactions and activities.
- Discourage the use of locker rooms by consumers of different ages at the same time.
- Prohibit the use of locker room horseplay such as towel snapping.
- When possible, arrange lockers to minimize unnecessary privacy.
- Require all employees (including maintenance) and volunteers to also watch for suspicious or inappropriate locker room conduct.

Sample Procedure for Monitoring and Supervising Diapering, Toileting, and Personal Care Assistance

Personal care may involve a variety of activities, such as diapering, toileting, bathing, and dressing. It is important to follow personal care procedures for both the protection of the consumer, as well as for the protection of employees from false allegations.

Personal care procedures, regardless of the setting in which the consumer receives services, should take into consideration the age and development of the consumer as well as the consumer's particular needs for assistance. Ideally, the degree to which employees would be expected to assist in these vulnerable/high-risk activities for each consumer should be documented in the individual consumer's case, behavior, service, or treatment plan.

As much as able (based on age and ability of consumer), employees should use verbal prompts to guide the consumer in self-assisting tasks. If a consumer needs more assistance, then an alternative could be for the employee or volunteer to put their hand on top of the consumer's hand during the personal care activity. The primary goal when providing personal care or hygiene-related activities is to ensure there is guidance and documentation that outlines when and under what circumstances employees and volunteers may engage in these activities with consumers (beyond identified medical care needs).

The following are additional procedures to consider.

When assisting consumers with personal care:

- Always use the least intrusive methods possible. For example, allow the consumer to do as much as they can by themselves. To the degree possible, use verbal prompts, instead of physically touching consumers, to guide the consumer in self-assisting tasks.
- Avoid staring at the consumer's body.
- Document any observed injury, disclosures of abuse, or any interactions that may have been misinterpreted.
- Avoid giving physical affection. If physical affection is necessary, limit it to handshakes or high fives. Avoid more intimate forms of physical affection such as hugs.
- Allow for informal monitoring as long as it does not infringe on the consumer's right to privacy. For example, if possible, keep the bathroom or bedroom door cracked so passersby can see the adult assisting but not the consumer.
- Make every attempt to have employees of the same gender as that of the consumer to provide personal care.

For diapering:

- Placing the changing table in an open area where adult actions can be observed by others.
- Encouraging that diapers only be changed when at least two adults, or individuals, are present.
- Requiring written documentation of diaper changing.
- Informing supervisors if employees notice anything out of the ordinary or concerning while changing the consumer's diaper.
- Requiring employees to know and follow all licensing requirements having to do with diapering.

For toileting:

- Require employees to stand in the doorway with the door ajar while the consumer uses the restroom.
- If employees must enter the restroom to assist a consumer, ensure that the door to the restroom remains open.
- When possible, send in only one consumer at a time. When not possible, send in only as many consumers as there are stalls.

Sample Guidelines for Supervising Playground and Recreational Activities

Playgrounds and recreational activities can allow mixed age groups of consumers to have access to one another and create increased opportunities for inappropriate interactions between consumers. Employees and volunteers can become distracted by a consumer who does not behave properly in less structured situations. They may get involved in conversations with each other or step away to tend to personal business, such as phone calls. Playgrounds may have blind spots or equipment which obstruct supervision.

To reduce risk, procedures for playgrounds and recreational activities require:

- Minimum employee/volunteer to consumer ratios, which should mirror other activity ratios and consider:
 - age and number of consumers present;
 - special or unique consumer needs;
 - type of structures and equipment and the number of distinct activities occurring simultaneously;
- Size and configuration of playground/recreation area, i.e. barriers to supervision, whether physical boundaries like fences exist, geography and location, whether other outside groups will also be present. Definition of specific authorized areas and boundaries, including:
 - if and how outside groups can be cleared from activity areas during programming.
 - if outside groups or mixed ages are using facilities at the same time, delineate boundaries so that different groups do not intermix.
- Specific instructions on how to monitor barriers to supervision (such as storage sheds, playhouses, tunnels, and shrubs):
 - identify in advance any blind spots or equipment that obstruct line of sight supervision and designate them off limits or plan regular walk throughs of those areas.
 - station employees and volunteers near playground equipment such as tunnels and slides in order to reduce the appearance of privacy.
- Employees and volunteers assigned to specific areas to supervise, i.e., zone monitoring:
 - ensures recreation supervisors are adequately spaced around the whole area.

- they should continuously move within their assigned zone;
- position them around the perimeter of the recreation area to ensure ample supervision and that consumers remain in approved spaces.
- Active supervision:
 - employees and volunteers should position themselves to be able to see and hear all consumers to whom they are assigned.
 - anticipate what consumers will do and redirect when necessary.
 - listen and notice changes in sound or absence of sound.
 - remain engaged with consumers rather than socializing with other employees or volunteers.
- Reviewing boundaries and rules with consumers prior to the activity, including that they are to always remain in line of sight of employees and volunteers and how to report inappropriate behaviors.
- Specific bathroom procedures to be defined, ensuring there are enough recreation supervisors to always maintain ratios.
- Employees and volunteers periodically scan and conduct name to face roll calls for each age group and whenever moving from one activity or space to another.
- Prohibiting employees and volunteers using cell phones for personal business.
- Means of communicating with other recreation supervisors, including inside employees if possible, so they can get assistance when needed without exceeding ratios.
- An emergency plan for responding to incidents.
- Supervisors conduct periodic check-ins and assessments of the activity period and of the entire activity area.

Sample Guidelines for Supervising Transportation Activities and Transporting Consumers

General guidelines:

- Require written parent/guardian permission from all consumers on the trip. Employees take these permission forms and medical releases with them on the trip.
- Supervisors should provide advance approval for any long-distance or overnight trips.
- Use the “rule of three” when transporting consumers: At least two employees must transport a single consumer, or at least two consumers must be present if transported by a single employee.
- 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.
- Specify employee-to-consumer ratios. When possible, do not count the driver in the supervision ratio.
- Require employees to sit in seats that permit maximum supervision. If possible, employees should not share seats with consumers.
- Discourage mixed age groups or developmental levels from sitting together. When possible, high risk consumers are seated by themselves or in close proximity to an employee.
- Prohibit drivers from making unauthorized stops.
- Consumers may not be brought to the employee’s home or the home of any employee’s family member.
- Where applicable, require employees to document the beginning and ending time of the trip and the mileage, names of the consumers being transported, other employees and volunteers who are involved in transportation, purpose of the transportation, and the destination.
- Require documentation of any unusual occurrences.

When public transportation is used (in addition to the transportation procedures listed above):

- Consumers should remain in one area of the bus/train, if possible.
- Employees and volunteers that are assigned to a group should remain with that group.
- When transporting consumers overnight, employees must remain awake.

When transporting consumers in employee personal vehicles (in addition to procedures listed above):

- Employees must notify supervisors of all transportation activities.
- Employees must follow established organization policies on physical interactions with consumers while in vehicles.
- When possible, employees should avoid engaging in sensitive conversations with consumers.

Sample Procedures for Managing Quiet Time and Naptime

Our organization has written procedures for managing quiet and nap times. Our employees know and follow these procedures, which at a minimum include:

- Employees, volunteers, and consumers should not sit or lie on anyone's bed or be in anyone else's sleeping bag
- Encourage consumers to draw an imaginary line around their sleeping space and encourage them to report violations to an employee or volunteer.
- Employees and volunteers will not leave consumers alone during nap time
- Do not let consumers share a sleeping mat, blanket, or sleeping bag.
- Pay attention to who is sleeping next to whom.
- Arrange sleeping areas with as much space as possible between each consumer.
- Do not let consumers nap in areas not visible to employees and volunteers.
- Keep the room sufficiently lit so that you can easily observe all consumers.

Sample Guidelines for Supervising Transition and Free Times for Employees and Volunteers

Transition time and free times can be the busiest part of programming at an organization. Consumers rely on the practical supervision techniques of employees and volunteers to help keep consumers safe as they move around. Below are sample procedures organizations can implement in their programs to ensure safeguarding is always at the forefront.

Transition time and free time procedures:

- Require consumers to remain in line of sight of employees and volunteers at all times.
- Specify the employee-to-consumer ratio.
- Specify narrow authorized areas in the program areas.
- Ensure that all employees and volunteers are assigned specific areas or groups to supervise (“zone monitoring”).
- Follow established organization bathroom policies and procedures.
- Require periodic attendance checks for each age group.
- Require supervisors to conduct periodic check-ins and sweeps of the entire activity area.
- Allow the use of a cell phone or two-way radio as an alternative form of communication to be used during an emergency.

Internal Feedback Systems

Sample Policy Requiring Confidentiality of Reports

[Maintaining confidentiality helps minimize barriers to reporting and builds trust within the organization. This facilitates a healthy culture for responding. The following policy provides language to ensure this occurs in your organization.]

This organization will protect the confidentiality of anyone who reports allegations or disclosures of abuse, or other violations of law or policy to the extent possible under law. Legal and civil authorities (police, child or adult protective services) may require confidential information in order to investigate any report of illegal conduct, but this does not eliminate the requirement to maintain confidentiality within the organization and its employees, volunteers, and consumers.

The organization will provide written communication of any changes to this policy to all employees, volunteers, consumers, and parents/guardians.

Sample Policy for Follow-Up with Individuals who Report Concerns or Complaints

This organization is committed to creating a safe environment for our employees, volunteers, and especially our consumers and their parent/guardians. For that reason, we will treat every concern or complaint with the utmost seriousness and provide a timely, thorough, and objective response in every instance. When an individual shares a concern or complaint:

1. They will be given the time and attention necessary to allow them to share their thoughts in person.
2. They will be thanked for sharing their concerns with the organization and for contributing to maintaining a healthy and safe environment for everyone.
3. They will be advised that their concern is being taken seriously and that action will be taken.
4. They will be reassured that they have done the right thing by reporting and that their communication is valued.
5. They will be informed, in general statements, of the steps that the organization will take in addressing the matter.
6. They will be given contact information for someone in the organization with whom they can contact should they become aware of additional information.
7. They will be provided regular updates of how the process is advancing.
8. The organization will protect them from any form of retaliation.

Sample Policy for an Anonymous Reporting Mechanism for Employees and Volunteers

While we hope that our employees and volunteers feel that they can openly communicate any concerns, complaints, or grievances directly to someone in the organization, we understand that doing so can often be difficult. Because it is important to us that everyone be able to share their concerns, we provide the following mechanisms through which you can make an anonymous report:

The following is a list of anonymous reporting methods. *[The organization will need to determine how and to what extent they may offer these reporting mechanisms.]*

1. A mailbox, located at *[insert location of mailbox]*, which will be checked every other day by *[insert who will be responsible for checking the mailbox]*.
2. An anonymous online form that you can find and submit here *[insert link to webpage]*.
3. A reporting line you can reach by calling *[insert phone number]*.
4. Praesidium's Helpline you can reach at *[insert helpline number]*. For additional information about this Helpline please see Appendix _____. *[See below for a sample Appendix]*

Please keep in mind that our ability to respond quickly and adequately may be affected if the information provided is limited. However, we are committed to responding to all anonymous concerns to the extent possible.

Example: Praesidium Helpline

Call: () _____

This organization is committed to creating an environment where everyone is encouraged to share their concerns and those concerns are taken seriously. To this end, we have partnered with Praesidium to establish a helpline that is available to everyone (employees, volunteers, parents/guardians, consumers, community members, etc.) 24 hours a day, seven days a week, 365 days a year.

What is the Praesidium Helpline?

The Praesidium Helpline is a consultation line anyone in the organization can call to discuss observations of inappropriate behaviors, suspicious behaviors, policy violations, instances of consumer-to-consumer sexual activity, and any other abuse prevention questions and issues.

What can you expect when you call?

One of Praesidium's experts will be ready to answer your call and gather any information relevant to your concern or question. If the matter the caller shares is one deemed to be suspected or known sexual abuse, the caller will be instructed by Praesidium to immediately call the civil authorities.

What happens once you get off the call?

Praesidium’s team of risk management experts comprised of social workers, attorneys, and other professionals will staff the concern or situation and develop recommended responses and next steps. Praesidium will then share the concern and the recommendations with stakeholders at the organization.

Sample Guidance for Collecting Data Relevant to Abuse Prevention

Strong internal feedback systems leverage various types of data to identify high-risk activities, individuals, or programs and the overall organizational climate for reporting. Data (including incident reports, survey results, turnover or discharges, consumer and parent/guardian complaints, and employee or volunteer grievances) can provide valuable information for a wide variety of considerations, such as identification of programs that may require additional monitoring or resources, or about individuals who may require increased supervision or training. It may also alert decision makers about changes that need to be made to reduce potential exposures. Finally, data from like programs and trends over time may show where additional abuse risk management efforts are necessary.

Every organization has data collection systems that can help identify risk. The key is to identify available opportunities for collecting data and begin to look for red flags of concern or abuse risk.

Data relevant to the prevention and detection of abuse can be collected from the following items:

- Incident reports
- Injury reports
- Physical restraint/de-escalation reports (if applicable)
- Satisfaction and/or feedback surveys from employees, volunteers, parents/guardians, and consumers
- Turnover or retention of employees, volunteers, and consumers
- Employee or volunteer exit interviews
- Complaints from consumers, parents/guardians, and other stakeholders
- Grievances from employees, volunteers, consumers, and parents/guardians
- Licensing violations
- Internal quality improvement audits and/or case reviews
- Monitoring visits or calls to programs and/or specific activities

With regard to the prevention and detection of abuse, incident reports should include the following documentation of data:

- Date and time of incident
- Location of incident
- Type of incident (must select type—bullying and hazing, consumer-to-consumer sexual activity, adult to consumer abuse, adult to consumer boundary violation, general injury, property destruction, verbal assault, physical assault, etc.)

- Names of consumers and other individuals involved in the incident
- Names and positions of employees present during incident (or disclosure of incident)
- Names of witnesses present during incident
- Immediate actions taken by employee
- How the incident was resolved
- Next steps taken by supervisor or administrators
- Who was notified internally and when and how they were notified
- Who was notified externally (i.e., police, abuse hotline, parents/guardians, etc.) and when and how they were notified (i.e., phone call, email, online form)
- Reference numbers (if applicable) for calls to hotlines or law enforcement
- Identification of necessary corrective action to prevent a recurrence
- Require signature of key administrators who have reviewed the report
- Ongoing documentation of additionally learned information of investigation results

Consumer Participation

Sample Adult Consumer Code of Conduct

This Code of Conduct outlines specific behavioral expectations for adult consumers.

Abuse or Mistreatment

Our organization's top priority is keeping consumers safe. Any form of abuse or mistreatment of consumers, employees, and volunteers is prohibited. Consumers shall not abuse or mistreat employees, volunteers, or other consumers in any way. Use of abusive language, obscene or profane language, including racial, religious, or sexual references directed at other people will not be tolerated. It is important to treat others as you would like to be treated.

Consumers shall not engage in verbal, emotional, physical, or sexual abuse or mistreatment of other consumers, employees, or volunteers.

Bullying

Our organization will not tolerate the mistreatment or abuse of one consumer by another consumer. 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 physical bullying, verbal bullying, nonverbal or relational bullying, cyberbullying, sexualized bullying, and hazing.

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.

Personal Relationships

Appropriate and supportive personal relationships between consumers are encouraged. However, our organization strongly discourages romantic relationships between consumers while engaged in programming. Consumers may not hold hands, sit on others' laps, kiss, or engage in other physical or sexual contact with other consumers while in programming.

Additionally, there should never be, under any condition, a romantic or otherwise sexual relationship between a consumer and an employee or volunteer.

Electronic Communication

Direct or text messaging between consumers and employees/volunteers is not allowed, unless approved by a program supervisor and administrator. Employees and volunteers are not permitted to befriend/follow consumers on social networking or social media sites. Consumers will comply with the organization's policies governing the use of personal mobile communication devices while in programming.

Alcohol, Drugs, and Tobacco

Possession and/or use of alcoholic beverages, drugs, and tobacco products while at the organization is strictly prohibited. Consumers will not be permitted to participate in any program while under the influence of alcohol, drugs, or illicit substances.

Weapons

We want our organization to be a safe place for all individuals. Weapons, and items that may be considered weapons, are prohibited. Anyone found to be in possession of such items will be required to leave and the items will be confiscated. The authorities may be notified as appropriate.

Violence

Our organization seeks to provide a safe environment for individuals in our community. Violence and threats of violence will not be tolerated at our organization, on our grounds, in our facilities, in other facilities being utilized or visited by our organization, or during organization-sponsored activities and events. Employees are available to assist in the resolution of differences.

Disruptive Behavior

We take pride in the integrity of our organization and we always want to ensure individuals are safe. Inappropriate or disruptive behavior is not permitted in our organization. This includes, but is not limited to, graffiti, littering, spitting, or throwing objects that could intentionally or unintentionally harm others or cause disorder.

Reporting

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

Consumers are encouraged to report concerns or complaints about other employees, volunteers, and other consumers to a supervisor who can be reached at *[insert telephone number]* or the *[Anonymous Helpline]* at *[insert telephone number]*.

Sample Guidelines for Providing Consumers with Organizational Policies on Abuse Prevention

Consumers can contribute to their own safety if they know what is acceptable and what to expect from employees and volunteers and other consumers. If violations occur, they can spot them and be empowered to let employees know.

Our organization will provide consumers with age and developmentally appropriate information explaining our organization's policies and procedures related to abuse prevention. This document should, at a minimum, include the following:

- Code of conduct for employees/volunteers.
- Policies regarding appropriate and inappropriate displays of physical affection.
- Policies regarding appropriate and inappropriate verbal communication.
- Policies regarding one-on-one interactions and outside contact between employees/volunteers and consumers.
- Policies regarding electronic communication between employees/volunteers and consumers.
- Policies regarding gift giving and receiving between consumers and employees/volunteers.
- Policies regarding appropriate and inappropriate consumer-to-consumer interactions.
- The process for consumers to report concerns, complaints or grievances back to the organization.

Responding

Sample Policy Requiring Reporting of Red-Flag or Inappropriate Behaviors and/or Policy Violations

Our organization has zero tolerance for abuse. It is imperative that every employee or volunteer actively participates in the protection of consumers.

In the event that employees or volunteers observe red-flag or inappropriate behaviors and/or policy violations by other employees or volunteers, it is their professional and personal responsibility to immediately report their observations in accordance with the organization's reporting procedures.

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

The following are examples of red-flag or inappropriate behaviors that all employees and volunteers are required to report:

- Any violation of the organization's abuse prevention policies
- Seeking unauthorized private time or one-on-one time with consumers
- Seeing or visiting with a consumer outside of scheduled programing
- Buying gifts for individual consumers
- Sending unauthorized electronic communications through text messaging, social media, online gaming, etc. in violation of the organization's electronic communication policy
- Making suggestive comments to consumers
- Showing favoritism towards a consumer or type of consumer
- Consumers disclosing that an employee or volunteer makes them feel uncomfortable

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.

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

- 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.
- Complete an internal report but do not conduct an investigation.
- Keep reporting until the appropriate action is taken.

Supervisor and Administrator Response to Red-flag or Inappropriate Behaviors and/or Policy Violations

In the event that a supervisor or an administrator receives a report of suspicious or inappropriate behaviors or policy violations from an employee, volunteer, consumer, or parent/guardian, the supervisor is instructed to do the following:

- Report to the next level supervisor or administrator.
- Speak with the employee or volunteer who has been reported.
- Review the file of the employee or volunteer to determine if similar complaints were reported.
- Determine the appropriate response based on the report.
 - i. Take into consideration factors such as:
 1. Context of red-flag or inappropriate behavior or policy violation;
 2. Severity of red-flag or inappropriate behavior or policy violation;
 3. History of red-flag or inappropriate behaviors or policy violations;
and
 4. Trainability of employee or volunteer.
- Document the report on the appropriate form.
- If at any point in gathering information about a report of red-flag or inappropriate behavior, a concern arises about possible abuse, contact the state authorities and file a report.
- If appropriate, notify parents/guardians.
- Advise the person who reported the behavior that the report is being taken seriously.

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

- Increase monitoring or supervision of the employee, volunteer, and/or program.
- If policy violations with consumer(s) are confirmed, the employee or volunteer must be subject to disciplinary action up to and including termination and prosecution. Disciplinary action will follow the Progressive Disciplinary Process outlined by the organization.
- If more information is needed, interview and/or survey other employees and volunteers or consumers.

Organizational Response – After the internal review of the red-flag or inappropriate behaviors or policy violations, determine if system changes are necessary, such as:

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

Sample Procedure for Internal Review of Red-Flag or Inappropriate Behaviors and Policy Violations

In the event that there is a report of red-flag or inappropriate behaviors or policy violation, specific employees will be responsible for reviewing circumstances surrounding red-flag or inappropriate behavior and should be trained to conduct internal reviews or investigations so that larger or system-wide implications may be identified. Additionally, it is recommended, when possible, that these internal reviews occur collaboratively outside of the program involved so that an objective and thorough review can be conducted. The designated employees are instructed to do the following:

Evaluate the root-cause of the red-flag or inappropriate behaviors or policy violations

1. Define the problem.
 - a) Identify the Who, What, When, and Where.
2. Gather all information and data surrounding the problem.
 - a) Review the Incident
 - b) Review Documentation
 - c) Interview Key Individuals
 - d) Review Policies
 - e) Review Training Curriculum
3. Perform the Analysis and determine root cause(s).
 - a) Ask Why?
 - b) What are the system-wide causes that allowed the incident to occur?
4. Identify Corrective Action—recommendations to stop the recurrence of the problem in the future.
 - a) What operation(s) in Praesidium’s Safety Equation was found to be deficient?
 - b) What best practice standards can be put in place to prevent a reoccurrence?
 - c) What are the resources needed to implement the best practice standard?
 - d) How are we going to implement and ensure compliance?
5. Implement the necessary solutions.

Sample Procedures for Employee and Volunteer Response to Allegations or Incidents of 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.* If you are in need of more information on your state's specific reporting requirements, please visit the [Child Welfare](#) website.

In addition to reporting to state authorities, employees and volunteers are required to report any suspected or known abuse of consumer 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:

1. Immediate supervisor
2. Directors
3. Administrators

Additional guidelines for employee and volunteer response to incidents or allegations of abuse:

- If you witness abuse, safely interrupt the behavior immediately.
- If abuse is disclosed to you, assure the individual disclosing that he or she was correct to tell you.
- Protect the alleged victim from intimidation, retribution, or further abuse to the extent possible.
- 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 according to incident reporting and documentation requirements. 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.

Sample Procedure for Supervisors and Administrators Responding to Allegations or Incidents of 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 the state specific mandated reporting requirements for more information.* If you are in need of more information on your state's specific reporting requirements, please visit the [Child Welfare](#) website.

Guidelines for supervisors 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.
- If receiving report from employee or volunteer, be sure to verify they have followed mandated reporting requirements or will follow immediately after making internal report.
- Report to any applicable external licensing or governing bodies.
- 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 an employee or volunteer, notify your crisis management team and follow your crisis management plan.
- Suspend the accused employee or volunteer until the investigation is completed.
- Ensure that consumer's parents/guardians are notified (when applicable).
- Deploy communication plan.
- Provide resources for victims, families, and other stakeholders.

Sample Procedures for Internal Review of Allegations and Incidents of Sexual Abuse

Written procedures that include mandated reporting requirements as well as internal and external documentation is important for several reasons. First, having these procedures written and implemented ensures compliance with state laws regarding mandated reporting. Second, documentation of allegations and disclosures of abuse ensures transparency both internally and externally in the organization. Lastly, having these procedures in a written format ensures that all employees and volunteers understand their role in reporting.

If there is a report or incident of sexual abuse, *[insert individuals responsible for internal investigation]* be responsible for conducting and internal review or investigation of the circumstances surrounding the allegation or incident of abuse. The employees tasked with this responsibility should be trained to adequately fulfill their responsibilities in a manner that will help them identify larger or system-wide implications. Additionally, it is recommended, when possible, that these internal reviews are led and conducted by an employee outside of the program involved or by a professional, external investigator, so that an objective and thorough review can be conducted.

In the case of potential sexual abuse, the organization will conduct an internal review or investigation only after reporting to the civil authorities and with their consent. If the authorities conduct an investigation, the organization will cooperate fully with them and will not take any steps that may interfere with said investigation.

If the civil authorities do not proceed with an investigation or if they consent to the organization conducting a simultaneous internal review, the designated employees are instructed to do the following:

6. Define the problem.
 - a) Identify the Who, What, When, and Where by reviewing the initial allegation report (if written) and interviewing the potential victim-survivor.
7. Gather all information and data surrounding the circumstances and the accused.
 - a) Review the initial allegation report
 - b) Review additional documentation and materials (personnel file, documentation completed by others with respect to the incident, training records, disciplinary records, video footage, etc.)
 - c) Interview additional key individuals (accused, supervisors, witnesses, etc.)
 - d) Review Policies
 - e) Review Training Curriculum
3. Perform the Analysis and determine root cause(s).

- f) Ask Why?
- g) What are the system-wide causes that allowed the incident to occur?
- 4. Identify Corrective Action—recommendations to stop the recurrence of the problem in the future.
 - h) What operation in Praesidium’s Safety Equation was found to be deficient?
 - i) What best practice standards can be put in place to prevent a reoccurrence?
 - j) What are the resources needed to implement the best practice standard?
 - k) How are we going to implement and ensure compliance?
- 5. Elaborate a report to document your findings and corrective actions.
- 6. Implement the necessary solutions.

Additional Guidelines for Employees Conducting Internal Reviews:

1. The employee will advise any interviewees that he/she represents the organization and that conversations with the employee are not subject to any attorney/client privilege.
2. The employee will strive to maintain the rights of all concerned in the process.
3. If the internal review results in additional information that may suggest an incident of sexual abuse has occurred, the civil authorities shall be re-contacted and a follow-up report will be submitted, if requested.

Who Should be Designated to Conduct Internal Reviews of Allegations of Abuse:

1. Someone from the Human Resources Department and/or Leadership.
2. Employees that have training in conducting interviews.
3. Employees responsible for abuse prevention initiatives.
4. External professional investigator.

Sample Guidance for Creating a Victim-Centered Response Plan

Be Prepared

- Designate a victim assistance coordinator.
- Understand the dynamics of disclosure and why survivors sometimes take years to come forward.
- Understand that certain aspects of the survivor's recollection of events may be fuzzy but that does not mean the survivor is not credible.
- Ensure your organization's response plan includes outreach to those affected.
- Train front line employees on how to respond appropriately:
 - Document all details provided including the name of the reporter, when they made their report and who took the report.
 - Thank the individual for reporting. "Thank you for telling me." Inform the reporter that the information will be passed to the designated organization point person who will follow up with additional support as soon as possible.

Once a Survivor Has Been Identified

- Proactively reach out and offer to meet. If they don't want to meet, ask what would be most helpful to them. What would they like to see happen as a result of coming forward?
- Ask how you can support them. Don't assume you know what they want and why.
- Consider offering resources to meet the needs of those affected (i.e., counseling, therapeutic services, pastoral assistance)
- Don't be afraid to apologize for what happened in the past.
- Be clear with the survivor about your reporting requirements.

When Meeting with a Survivor

- Listen to all information the reporter provides and be compassionate.
- Tell the survivor they were right to come forward.
- Let the survivor know you believe them.
- Assure the survivor the abuse was not their fault.
- Provide confidence that consumer protection is your highest priority and safeguards are in place.
- Avoid expressing shock or outrage.
- Avoid questions that could make the survivor feel responsible (i.e. Why did you take so long for you to report?).
- Follow mandated reporting requirements.
- Inform the survivor that the organization will provide transparent and regular updates on the investigation and next steps as much as possible.
-

Sample Crisis Management Plan

Definition:

- Crisis – defined as any occurrence that harms a consumer, threatens the public reputation or immediate financial integrity of the organization, or that may create a situation of legal liability to the organization or its directors or officers. Examples include: allegations or incidents of suspected abuse including consumer-to-consumer abuse, arrest of current or former employee or volunteer for child pornography, etc.

Key Crisis Management Objectives

- Prioritize consumer protection and safety
- Be proactive, timely, transparent, accurate, consistent, and unified in the messages presented internally and to media, stakeholders, and the public
- Maintain strong relationships with various stakeholders
- Evaluate the organization’s policies and protocols and demonstrate to stakeholders and general public how the organization is evolving to correct past challenges and improve the organization’s safeguarding efforts
- Prepare for a potential crisis year-round, not just when one occurs

Prior to Allegation/Incident

- Determine who from the organization will be on the Crisis Management team
- Educate all employees and volunteers on what to do if someone alleges current or historical abuse involving a consumer, employee, or volunteer of the organization
- 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 incident forms for the organization.

Once Allegation/Incident Occurs

Secure Immediate Safety and Minimize Access

- To the extent possible, ensure the victim-survivor is secure and safe from additional harm or abuse
- Follow all mandated reporting requirements and contact the authorities as appropriate.
- If the accused person is an employee, follow progressive discipline procedures accordingly. This may involve suspending the accused during the investigation.
- Where applicable, prevent the accused from having further access to consumers until a thorough incident review and/or investigation is completed. Before beginning an

internal incident review, verify with local authorities that this will not interfere with their investigation.

- When applicable, notify other employees that there has been a critical incident and the crisis management plan has been activated.

Initial Communication Plan

- Designate a point person to respond to all inquiries from parents/guardians, the media, and other stakeholders.
 - Prepare a short media statement in advance or anticipation of receiving a media or public 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 spokesperson.
- As soon as possible, meet in person (not over the phone) with identified victim-survivors and their parents/guardians.
 - Reassure them that you are taking the allegation or incident seriously.
 - Find out what response they desire and be prepared to explain what support you will offer, such as counseling or therapeutic services.
- Consider reaching out in writing to parents/guardians of all consumers attending your organization or the particular program in which the accused offender was involved or had contact with consumers.
 - 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 any suspensions, investigations, arrests, etc.
 - **Contact Request.** Ask parents/guardians to contact the organization or the specified authorities if they suspect their consumer may have been abused.
 - **Your Response:** Explain that your organization is fully cooperating with the authorities. Describe proactive steps the organization is taking such as offering resources to individuals, hosting a parent/community meeting, training employees and volunteers, and conducting an independent investigation to learn from this incident so the organization can prevent it from happening again.

- Host a parent/community 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 the organization is providing families and give parents/guardians a chance to ask questions.
 - Provide parents/guardians with information about how to talk to their consumers about abuse.

Ongoing Communication and Response

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

Promote Prevention at All Levels of the Organization

- Educate parents/guardians on abuse prevention information. Offer a workshop during which parents/guardians can learn how to protect their consumers 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 the 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.

Sample Procedure for Employee and Volunteer Responding to Consumer-to-Consumer Sexual Activity

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 or volunteers witness consumer-to-consumer sexual behaviors that are contrary to defined behavioral expectations between consumers, they are instructed to follow these guidelines:

- If you observe sexual activity between consumers, you should safely separate them as soon as possible.
- Calmly explain that such interactions are not permitted and separate the consumers.
- Notify your supervisor and parent/guardian (when applicable)
- Complete the necessary documentation including what you observed and how you responded.
- Follow your supervisor's instructions regarding notifying the authorities and informing the parents/guardians of the consumers involved.
 - i. Do not attempt to determine whether the consumer's behavior was "sexual curiosity". There is not a standard definition of what normal sexual curiosity looks like. An external body, such as law enforcement, utilizes criterion to investigate and determine whether the consumer's behavior is sexual curiosity.
- If the problem is recurring, additional action may be required including not allowing one or both consumers to return to the program.
- Identify how consumers will be managed or supported to prevent further occurrences of sexual activity (i.e., safety or behavioral plans including additional supervision requirements)

Sample Procedure for Supervisors and Administrators Responding to Consumer-to-Consumer Sexual Activity

In the event that a supervisor or administrator receives a report of a consumer's sexualized behavior or consumer-to-consumer sexual activity, they are instructed to follow these guidelines:

- Meet with the employee or volunteer who reported the sexual activity to gather additional information.
- Confirm that the consumers involved have been separated or placed under increased supervision.
- Notify the proper authorities.
- Review the incident report to confirm it is accurately and thoroughly completed.
- Meet with parents/guardians of the consumers involved (when applicable).
- Review the immediate steps taken by the employee or volunteer who initially responded.
- Determine what additional actions should be taken to ensure there is not a recurrence.
- In some cases, consumer behavior can be managed through a safety or behavior management plan.
- Develop a written corrective action or follow-up plan in response to the incident.

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

- Assessing the suitability of the program for the consumers involved.
- Review the need for additional consumer or program supervision
- Review the need for revised policies or procedures
- Review the need for additional employee or volunteer training
- Review the need for additional consumer education
- Alert others in the organization

Administrative Practices

Sample Items to Include in a New Program Approval Checklist

To protect our employees, volunteers, and our consumers, we want to be sure that we are making informed and thoughtful decisions about new programs, services, and activities. To that end, an employee or volunteer who wishes to start a new program or service, must follow this process and submit a written proposal to [*insert name of person or department*] for approval. If you are planning an activity that falls outside of the scope of your program, you must also submit a written proposal and request for approval.

The written request must include the following information:

- General Program/Activity Information
 - Name of the program.
 - Brief description of the program.
 - Purpose/goals of program.
 - New or returning program.
 - Ages of consumers served.
 - Estimated number of consumers to be served.
 - Individuals responsible for the program, and who will serve as the director or supervisor.
 - Start and end date of the program.
 - Location of the program and program schedule (where and when).
 - Estimated number of employees, volunteers, and/or third parties needed [*insert ratio description*].
 - ◇ Is the organization responsible for screening and selection?
 - ◇ Is the organization responsible for training?
- Appropriateness
 - Does the program fit within the goals of the organization?
 - Has background research been completed?
 - Has a needs assessment been completed?
 - What is the approximate annual budget needed for the operation of the program?
- Program Procedures
 - Provide a monitoring and supervision plan for the program. Include specific risks and how they will be addressed, based on the following questions:
 - Will transportation be provided? If so, what are the transportation guidelines?

- What are the bathroom procedures?
- Does the program involve overnight stays? If so, submit a plan for lodging arrangements, sleeping assignments, and a monitoring and supervision plan.
- Does the program include aquatics? If so, what are the procedures for monitoring locker rooms and changing areas?
- What are the procedures for managing additional high-risk activities during the program?
- Authorization
 - Include the name and signature of the employee or volunteer submitting the proposal.
 - Include the name and signature of the administrator who approves the new program proposal.
- Additional Requirements
 - All new programs must adhere to all established organization policies and procedures.
 - The employee or volunteer submitting the request must receive written approval before moving forward with the program.
 - If the scope of the program changes substantially at any point, the employee or volunteer responsible for the program must submit a new written proposal and request for approval as soon as possible.

Working with Third Parties and Facility Rentals

Third-party and external organizations or individuals providing services to the organization's consumers or using the organization's facilities fall within the scope of the organization's abuse prevention policies. Third parties are expected to adhere to all applicable abuse risk management policies.

This organization requires third parties and external organizations or individuals to register programming prior to operation as set forth in this policy. Third-party agreements will include, at minimum, language to address compliance with mandatory reporting, insurance requirements, screening procedures and individual background clearances, and consumer protection training. Additionally, such entities or individuals that fall under this policy will be required to sign and adhere to the organization's Code of Conduct related to consumer safety.

Further, the organization will designate a person, a committee, or a department to oversee third-party compliance with the organization's abuse prevention policies.

Third parties may have high access to consumers. Therefore, at a minimum, third parties must be required to include or adhere to the following items as part of their contractual agreement with the organization:

Code of Conduct

- Require third parties to review and sign organization's Code of Conduct for working with consumers.

Defense and Indemnity for sexual misconduct and molestation

- Require third parties to defend and indemnify the organization for claims stemming from sexual misconduct and molestation.

Insurance

- Name third parties as additional insureds on any applicable insurance policy (including sexual abuse and molestation policy).

Screening

- Require third parties to adhere to our organization's criminal background screening practices including multi-state criminal background checks and sex offender registry checks.

Training

- Require all individuals responsible for consumers have received some minimal abuse prevention training (which can include the identification, prevention, and reporting of sexual abuse).

Supervision Procedures for Monitoring

- Third parties must have defined supervision procedures in place for monitoring their program participants (i.e., adult-to-consumer ratios and management of high-risk activities and locations). For joint events, clearly delineate supervision responsibilities between the organization and the third parties.
- Conduct scheduled and random observations of activities and programs to ensure third parties and facility renters are following procedures during their use of organizational facilities.

Reporting

- Ensure third parties and facility renters understand and provide written acknowledgement of both the internal and external reporting requirements of the organization.
- Require third parties and facility renters to report policy violations and incidents or allegations of sexual misconduct back to the organization, and to follow mandated reporting requirements.

Sample Policy for Classification of Volunteers

There are two categories of volunteers: **High-Access** and **Low-Access**. The category of volunteer determines the level of screening, training, and supervision the volunteer requires.

**If uncertain whether a particular volunteer opportunity is High-Access or Low-Access, pick High-Access because this category provides the greatest protection for consumers and for your organization.*

High-Access Volunteers

High-Access Volunteers typically interact often or over an extended period with consumers. Such volunteers may be readily known to consumers under their supervision and to other volunteers and employees in the program. They may also supervise consumers with or without an employee present. High-Access Volunteers may carry a substantial amount of responsibility in a program serving consumers and such volunteers may have opportunities to develop relationships with consumers over time. Examples of High-Access Volunteers include a volunteer program instructor, a regularly scheduled volunteer coach, or a mentor for a consumer.

Recommended High-Access Volunteer screening process:

- An application with the Code of Conduct attached;
- In-person interview with behaviorally based interview questions;
- References; and
- A multi-state criminal background check and national sex offender registry check.

Recommended High-Access Volunteer training process:

- Initial Abuse Prevention Training required of employees in similar position; and
- Annual Abuse Prevention Training required of employees in similar position.

Low Access Volunteers

Low Access Volunteers typically interact with consumers only in line-of-sight of an employee and only infrequently. Such volunteer might be a parent/guardian who is helping at a one-time event, or someone who only works with adults, not consumers. Low Access Volunteers may not be known by the consumers in the program or to other volunteers and employees. Low Access/Occasional Volunteers have limited access to consumers and have few opportunities to develop relationships with consumers over time.

Examples of Low Access Volunteers include a one-time event volunteer (such as for a fun run), parents/guardians who assist at a program where their child is a participant, a volunteer who works strictly with adults outside of the organization's property, a volunteer who helps with business activities and does not interact with consumers, or a board member.

Recommended Low Access Volunteer screening and training process:

- A national sex offender registry check.
- Provide volunteer with the organization's Code of Conduct; and
- Review of abuse prevention policies