

# Child Sexual Abuse Prevention Assessment for School Districts

## Best Practices #1 - Determine Your Starting Point

- **Compile your formal child sexual abuse prevention policies.** What do you have documented in your:
  - Employee handbook?
  - School safety plan?
  - Emergency plan?
  - Title IX procedures?
  - HR process?
  
- **Document your informal child sexual abuse prevention practices.** What are the known boundaries and behaviors that you and your staff practice that are not documented?
  
- **Identify organizational or cultural barriers.** Which of the following barriers are a challenge in your district?

<ul style="list-style-type: none"><li><input type="checkbox"/> Fear of being wrong</li><li><input type="checkbox"/> Fear of civil lawsuits</li><li><input type="checkbox"/> Fear of criminal charges for failure to report</li><li><input type="checkbox"/> Fear of retribution by the accused</li><li><input type="checkbox"/> Fear of increase in insurance premiums</li><li><input type="checkbox"/> Fear of loss of licensing or ability to continue operations</li><li><input type="checkbox"/> Fear of marred reputation in the community</li><li><input type="checkbox"/> Fear of reporter identity being kept confidential</li><li><input type="checkbox"/> Fear of opening a can of worms</li><li><input type="checkbox"/> Denial and disbelief</li><li><input type="checkbox"/> Culture of silence/secretcy</li><li><input type="checkbox"/> Culture of intimidation and victim harassment</li><li><input type="checkbox"/> Lack of knowledge</li></ul>	<ul style="list-style-type: none"><li><input type="checkbox"/> Investigation is best handled internally</li><li><input type="checkbox"/> District police can/should do the investigation</li><li><input type="checkbox"/> Putting adults' rights before children's</li><li><input type="checkbox"/> Cognitive dissonance</li><li><input type="checkbox"/> Collegial/organizational loyalty</li><li><input type="checkbox"/> Report only abuse at home</li><li><input type="checkbox"/> Lack of time/money</li><li><input type="checkbox"/> Do the minimum the law requires</li><li><input type="checkbox"/> Abuser won't do it again</li><li><input type="checkbox"/> Not part of our core competencies</li><li><input type="checkbox"/> Philosophy of trust/forgiveness</li><li><input type="checkbox"/> Protecting friends/family</li><li><input type="checkbox"/> Damage control</li><li><input type="checkbox"/> Outright cover-up</li></ul>
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## Best Practices #2 - Manage Access to Children

- **Document responsibility for your child sexual abuse prevention best practices program.**
  - Who is ultimately responsible for the protection of children in your district?
  - Where is it documented?
  - How is it communicated to staff, parents, and students?
- **Integrate child protection into the applicant screening process.**
  - Do you encourage or discourage your staff to respect their intuition?
  - Do you incorporate multiple interviews for staff and volunteers?
  - Do you include character focused questions in the interview process? If so, do you have a list of questions documented? If so, what are the questions?
  - Do you incorporate general and child sexual abuse boundary questions in your interviews? If yes, what questions do you ask? Are the questions documented along with responses that would be concerning?
  - Do you discuss your child sexual abuse prevention program with your staff and volunteer candidates?
  - How do you formalize the feedback process from interviewers so that they are making independent recommendations and are not influenced by 'Groupthink'?
  - Do you have a standardized process used by all staff who are conducting reference checks? If so, what is the process and where is it documented?
  - What is your standard process for background checks?
    - Is the process utilized for all staff and volunteers (long-term and event based)?
    - Do you do fingerprint based criminal background checks?
    - Are the criminal background checks nationally based?
    - Are the criminal background checks multi-state, if your candidate has moved out-of-state?
    - Does the background check process look at the Registered Sex Offender Registry?
    - Do you check the Child Abuse Registry through your local child protective services agency?
    - Do you check the National Association of State Directors of Teacher Education and Certification (NASDTEC)?
    - Do you check the California Commission on Teacher Credentialing (CTC)?
    - Do you check your candidate's personnel file, if they are within your district? How far back?
    - Do you check your internal records to see if the candidate (staff and volunteers) has been previously dismissed or disqualified during an earlier screening process?
    - Do you do an internet and social media search?
    - Is the full process completed prior to hiring or bringing on volunteers?
    - Do you have a list of pre-established disqualifiers that the results are checked against?
    - Are background checks done on a recurring basis after hire or volunteer assignment?
  - Do you have a list of red flags to look for in the screening process?
    - What are the red flags in the application process?
    - What are the red flags in the interview process?
    - What are the red flags in the reference check process?
    - What are the red flags in the background check process?

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## Best Practices #3 - Set, Document and Enforce Boundaries

- **Boundary Documentation.** As you review each category to see what boundaries you already have in place, answer the following questions for each boundary or process:
  - Are these boundaries and processes formal or informal?
  - Have these boundaries and processes been reviewed and approved by appropriate authorized administrators?
  - Where are these boundaries documented?
    - Employee handbook?
    - School safety plan?
    - Title IX procedures?
    - Annual registration package?
    - By mail, e-mail, electronic newsletter?
    - School or district website?
  - How is the documentation communicated, distributed, and accessed by:
    - Staff?
    - Volunteers?
    - Parents?
    - Student
  - Are the documentation locations as well as the communication, distribution, and access methods sufficient to keep the information top-of-mind?
  - How are these boundaries integrated into the daily routine and culture of the district?
  - How often are the boundaries and processes reviewed and assessed for effectiveness?
  - Does the review process include feedback from staff, parents, and students?
  - Who is responsible to lead the review process?
- **On-Site Boundaries: Access.** What boundaries and processes are in place to protect children from unauthorized people accessing them when they are on your premises? Do you have policies regarding?
  - On-site visitor registration and supervision
  - Approval and supervision of registered sex offenders' who request on-site access to their children
  - Internet access and usage policies for staff, volunteers, parents, and students in all areas accessed by students

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## Best Practices #3 - Set, Document and Enforce Boundaries (continued)

- **On-Site Boundaries: Isolation.** What boundaries and processes are in place to prevent 1) children from being isolated and 2) failure to supervise, when they are on your premises? Do you have policies regarding?
  - One adult - one child situations
  - Approved and off-limits on premise locations
  - Pulling children out of their regularly scheduled program
  - Before or after school/program help
  - Monitoring infants, toddlers and non-verbal children
  - Video cameras in locations serving children with disabilities and other high risk areas
  - Family members working together
  - Monitoring nap time
  - Supervision during movies and other lights out activities
  - Observable diapering and bathroom monitoring
  - Use of rovers
  - Parental access and supervision for infants and pre-school age children
  
- **On-Site Boundaries: Behavioral.** What boundaries and processes are in place to protect children from others' inappropriate behavior when they are on your premises? Do you have policies regarding?
  - Unprofessional behavior
    - Inappropriate comments, stories, jokes
    - Being flirtatious
    - Snapping bra straps
    - Comments about hair, clothing, and make-up
    - Staff talking about their personal hygiene, struggles, or sex-life
    - Giving preferential treatment to a student
    - Hanging out with students
  - Intimidation: Secrets, lies, threats, coercion, and violence
  - Sexual discussions and exposing students to pornography or sexually explicit material
  - Limiting physical touch
    - Kissing
    - Massage
    - Stroking hair or body
    - Front-to-front or front-to-back hugs
    - Sitting on laps
    - Physical horseplay, piggy back rides, or typical games
    - Assisted instruction that includes body-to-body touching such as batting, violin, etc.
    - Excessive touching of any kind

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## Best Practices #3 - Set, Document and Enforce Boundaries (continued)

- **On-Site Boundaries: Behavioral.** (Continued)
  - Showering with students or changing clothes in front of each other
  - Entering children's rooms at night
  - Limiting medical exams and treatments by staff
  - Sharing of alcohol, illicit drugs, prescription drugs, or over-the-counter drugs
  - Photographs of kids
  - Hands in other people's pockets
  - Keeping hands where they can be seen
  - Masks, blindfolds, bondage, scatting, fetishisms, and rituals
  
- **Off-Site Boundaries.** What boundaries and processes are in place to protect children when your programs require off-premises travel? Do you have policies regarding?
  - List of evaluated and approved locations
  - Written authorization processes for staff requests and parental permission
  - Transportation control and supervision
  - Parent chaperones
  - Staff and volunteers meeting with children in hotel rooms
  - Staff and volunteer alcohol and drug use (illicit and prescription)
  
- **Off-Hours Boundaries.** What boundaries and processes are in place to protect children from inappropriate staff relationships during off-hours that cannot be monitored by other district staff? Do you have policies regarding?
  - Babysitting and tutoring
  - Visits to personal residences and sleepovers
  - Attending birthday parties and family gatherings
  - Hanging out with or traveling with students
  - Dating students
  
- **Electronic Communication and Social Media Boundaries.** What boundaries and processes are in place to protect children from isolated electronic communication? Do you have policies regarding?
  - Using social media applications for school assignments, communication, etc.
  - Sharing phone numbers, e-mail addresses, and screen names
  - Staff and volunteer's privacy settings and use of inappropriate images and content on social media
  - Being 'friends' or 'following' on social media applications
  - Communicating with students by video chat applications

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## Best Practices #3 - Set, Document and Enforce Boundaries (continued)

- **Child-to-Child Boundaries.** What boundaries and processes are in place to protect children from being abused by other minors? Do you have policies regarding?
  - Visibility and monitoring during nap time
  - Monitoring bathroom visits
  - Separating age groups
  - Avoiding inadvertent creation of authority of older minors
  - Supervision of children, especially when in mixed age groups
  - Supervision of children with disabilities, especially those who are immobile or non-communicative
  
- **Gift Boundaries.** What boundaries and processes are in place to keep children and families from becoming indebted, inappropriately influenced by, or blackmailed by staff and volunteers? Do you have policies regarding?
  - Tangible and intangible gifts to children
  - Tangible and intangible gifts to parents or caretakers
  - Loans to parents or caretakers