

Preventing Child Sexual Abuse Within Youth-serving Organizations:

*Getting Started on Policies
and Procedures*



U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Centers for Disease Control and Prevention



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Introduction

Youth-serving organizations strive to create a safe environment for youth, employees, and volunteers so that youth can grow, learn, and have fun. Part of creating a safe environment is making sure that youth are not harmed in any way while participating in organization-sponsored activities. One risk in any organization working directly with youth is child sexual abuse.

It is vital that organizations create a culture where child sexual abuse is discussed, addressed, and prevented.

This report is designed for representatives of youth-serving organizations who are interested in adopting strategies to prevent child sexual abuse. Whether these strategies are developed within the context of an overall risk management plan or are addressed separately, organizations need to examine how they can protect youth from sexual abuse.

Definitions

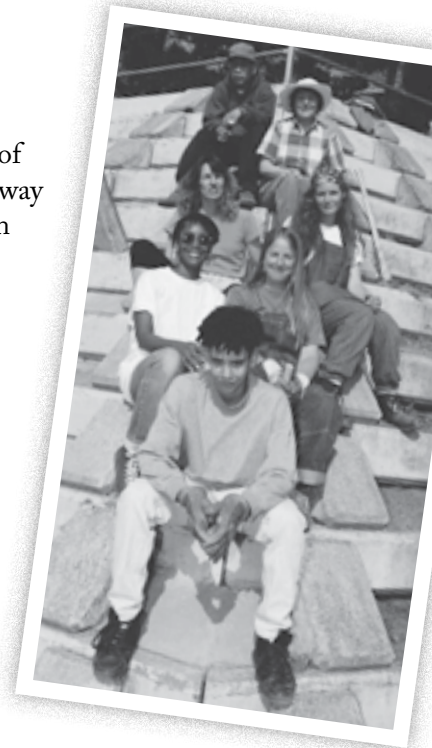
- Children and youth
 - Anyone between the ages of zero and 17 years. In this document, these terms are used interchangeably.
- Child sexual abuse
 - “Child sexual abuse involves any sexual activity with a child where consent is not or cannot be given. This includes sexual contact that is accomplished by force or threat of force, regardless of the age of the participants, and all sexual contact between an adult and a child, regardless of whether there is deception or the child understands the sexual nature of the activity. Sexual contact between an older and a younger child also can be abusive if there is a significant disparity in age, development, or size, rendering the younger child incapable of giving informed consent. The sexually abusive acts may include sexual penetration, sexual touching, or non-contact sexual acts such as exposure or voyeurism.”¹
 - Legal definitions vary by state, so look up your state guidelines using the Child Welfare Information Gateway (www.childwelfare.gov/systemwide/laws_policies/search/index.cfm).

What You Will Find in This Report

In the first section, you will find six key components of child sexual abuse prevention for organizations. These components were identified by the Centers for Disease Control and Prevention (CDC) in conjunction with experts:

1. Screening and selecting employees and volunteers
2. Guidelines on interactions between individuals
3. Monitoring behavior
4. Ensuring safe environments
5. Responding to inappropriate behavior, breaches in policy, and allegations and suspicions of child sexual abuse
6. Training about child sexual abuse prevention.

¹Myers JEB, Berliner L, Briere J, Hendrix CT, Jenny C, Reid TA, editors. *The APSAC handbook of child maltreatment*. 2nd ed. Thousand Oaks (CA): Sage Publications; 2002. p. 55.



Each component is described in detail, including the prevention goals, critical strategies, and additional strategies that could be considered depending on the context and resources of individual organizations.

The sections that follow offer suggestions for addressing challenges to developing and implementing a strategy to prevent child sexual abuse and provide tools to help organizations move forward. A list of publications and organizations that can provide helpful information is provided in Appendix B.

Contextual Issues

Every organization does not have to take on all strategies presented in this document. The process of implementing child sexual abuse prevention strategies takes time and will evolve differently in each organization. Not all strategies presented in this document will apply to all organizations. However, it is very important that organizations abide by their youth protection policies and procedures to avoid being criticized for not adhering to them if a youth is sexually abused. Adoption of strategies will depend on the following contextual issues:

- Organization's mission and individual activities. For example, though all youth-serving organizations are interested in helping youth develop into healthy adults, the mission of mentoring or religious organizations is often focused on fostering nurturing relationships between individual adults and youth. Because this mission results in more one-on-one activities between employees/volunteers and youth, these organizations need to adopt child sexual abuse prevention strategies that protect youth in one-on-one situations with adults.
- Culture and language of youth served by the organization.
- Insurance requirements.
- Available resources.
- State and national laws. Organizations should consult with legal representation and review state and national laws before adopting and implementing child sexual abuse prevention strategies. A good place to start is the Child Welfare Information Gateway, which provides state-specific information (www.childwelfare.gov/systemwide/laws_policies/search/index.cfm).

Balancing Caution and Caring

The same dynamics that create a nurturing environment, and may ultimately protect against child sexual abuse, can also open the doors to sexually abusive behaviors. Research has shown that youth who are emotionally insecure, needy, and unsupported may be more vulnerable to the attentions of offenders.² By promoting close and caring relationships between youth and adults, organizations can help youth feel supported and loved and thus reduce their risk of child sexual abuse. But that same closeness between a youth and an adult can also provide the opportunity for abuse to occur. When developing policies for child sexual abuse prevention, organizations must balance the need to keep youth safe with the need to nurture and care for them.

²Finkelhor D. Four preconditions: a model. In: Finkelhor D, editor. *Child sexual abuse: new theory and research*. New York (NY): The Free Press; 1984. p. 53–68.

Components of Child Sexual Abuse Prevention

The components that follow were identified during a meeting of experts sponsored by CDC in August 2004. The experts included advocates, child sexual abuse researchers, professionals who provide prevention resources for organizations, and representatives of youth-serving organizations that have child sexual abuse prevention programs. For a list of meeting participants, see Appendix A.



Component 1: Screening and Selecting Employees and Volunteers

Goal

To select the best possible people for staff and volunteer positions and to screen out individuals who have sexually abused youth or are at risk to abuse.

General Principles

Screening for child sexual abuse prevention should be integrated into the general screening and selection process that organizations already employ to choose the best possible candidates for positions. Child sexual abuse prevention should be one of the many areas considered when deciding whom to select. While employee/volunteer screening and selection are important, they should not be the only efforts adopted to prevent child sexual abuse.

Before you start screening

- Develop criteria that define how screening information will be used to determine an applicant's suitability.
- Identify who will make the final selection.
- Define areas of concern such as a fixation on a particular age or gender of youth or a history of crimes related to sex or violence.
- Develop consistent and systematic policies and processes for screening and selection, including a sequence and timeline for the various components of the process.
- Consult with an attorney to ensure that your screening and selection policies do not violate Title VII of the Civil Rights Act or other federal or state laws prohibiting discrimination in the workplace.

Who should be screened?

- Screen all applicants, both adults and adolescents, for all positions that will have contact with youth.
- Consider more in-depth written applications and personal interviews for adolescents, for whom work history and criminal background checks may be unavailable.
- Rigorously screen applicants who will have more autonomy as employees or volunteers.
- Do not make exceptions for people you know or have worked with in the past.

Critical Strategies for Screening and Selecting Employees and Volunteers

(These strategies are presented in roughly the order that they should be completed.)

Education about your organization and youth-protection policies

By letting applicants know your organization is serious about protecting youth, you may deter some people at risk of abusing youth from applying for staff or volunteer positions.

- Inform applicants about your organization's policies and procedures relevant to child sexual abuse prevention.
- Share your code of conduct or ethics.
- Require applicants to sign a document describing the policies and procedures of your organization to demonstrate their understanding and agreement.
- Ask applicants if they have a problem with any of the policies and procedures.

Written application

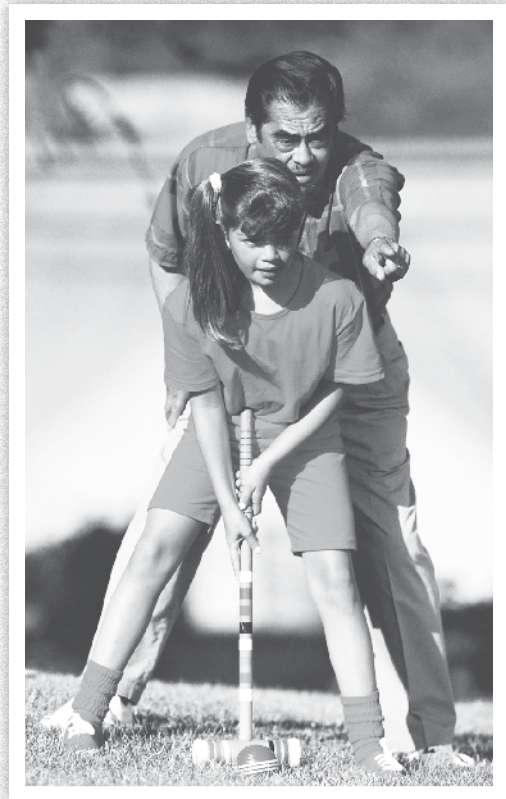
The written application provides the information you need to assess the background and interests of applicants. Questions should help you determine whether applicants have mature, adult relationships as well as clear boundaries and ethical standards for their conduct with youth. The sidebar on page 6 may help you develop appropriate questions.

- Ask about previous work and volunteer experiences.
- Ask questions pertinent to child sexual abuse screening.
- Provide a permission form for contacting personal references and performing a criminal background check. The permission statement should include an indemnification clause developed by an attorney to protect your organization from false allegations or other legal issues.
- Ask open-ended questions that encourage broad answers. These will provide material for follow-up in the personal interview and throughout the screening and selection process.
- Use disclosure statements to ask applicants about previous criminal histories of sexual offenses, violence against youth, and other criminal offenses. The applicant may not disclose past offenses, but the inquiry will demonstrate your organization's seriousness about protecting youth and potentially discourage applicants at risk for perpetrating child sexual abuse.
- Clarify that you are interested in learning about an applicant's past perpetration of child sexual abuse rather than a history of victimization.

Personal interview

The personal interview provides an opportunity to meet applicants, determine if they are a good fit for your organization, and ask additional questions to screen for child sexual abuse risk factors. The sidebar on page 6 may help you develop interview questions.

- Ask open-ended questions that encourage discussion.
- Clarify and expand upon the applicant's answers to questions from the written application.



Questions for Screening and Selecting Employees and Volunteers

The following questions may be used in a written application or personal interview. A single answer should not determine whether an applicant is selected or rejected. Along with other forms of information, answers to these questions can help you build a more complete picture of an applicant. Additional questions may be found in various publications and policies in the “Resource List and Sample Policies” section. (See Appendix B.)

- ***What type of supervisory situation do you prefer?***
If applicants are very independent, they may not fit in an organization whose policies and procedures require close supervision.
- ***What age/sex of youth do you want to work with? How would you feel about working with a different age/sex?***
If an applicant seems fixated on one age/sex, be wary. However, it may be that the applicant has experience or is gifted with working with certain age groups. Asking follow-up questions about why an applicant has a strong preference can help you determine if there is cause for concern.
- ***Is there anyone who might suggest that you should not work with youth? Why or why not?***
- ***Why do you want the job?***
- ***What would you do in a particular situation?***
Set up scenarios that involve potential concerns, boundary issues, or youth protection policies and interactions to gauge the applicant’s response. Be concerned if applicants disregard the organization’s policies and procedures or handle a situation poorly.
- ***What makes you a good candidate for working with youth? What would your friends or colleagues say about how you interact with youth?***
- ***What other hobbies or activities do you enjoy?***
Determine if applicants have mature, adult relationships—not just relationships with youth.

Reference checks

Reference checks provide additional information about applicants and help verify previous work and volunteer history.

- Obtain verbal—not just written—references for applicants. Conversations can elicit much more information than written responses.
- Match references with employment and volunteer history. Is anyone important missing from the references, such as the supervisor from the applicant’s most recent job? To provide a more complete picture of the applicant, the references should come from a variety of sources and should not be limited to family members or friends.
- Be aware that many employers will only provide basic information, such as dates of employment or rehiring eligibility. If a former employer will only provide limited information, clarify whether the person providing the reference is limiting information because of company policy.



The following questions may be useful for reference checks:

- How would you describe the personal characteristics of the applicant?
- How does the applicant interact with youth?
- Why would this person be a good candidate for working with youth? Is there any reason this person should not work with youth?
- Have you seen the applicant discipline youth (other than his or her own children)?
- Would you hire this person again? Would you want him or her in your organization in the future?

Criminal background checks

Criminal background checks are an important tool in screening and selection. However, they have limitations. Criminal background checks will not identify most sexual offenders because most have not been caught. When this report was published, an efficient, effective, and affordable national background screening system was not available.

- Use background checks as one part of child sexual abuse prevention efforts. Using background checks alone may give your organization a false sense of security.
- Save time and resources by delaying criminal background checks until the end of the screening and selection process. Applicants who do not make it through the written applications, personal interviews, and reference checks will not need a criminal background check.
- Obtain permission from applicants before beginning a criminal background check.
- Determine the type and level of check required for each applicant. Types of checks include name, fingerprint, sex offender registries, and social security number. Checks may be implemented at county, state, and national levels. Records are not always linked or comprehensive, so a thorough search may be needed to address concerns about an applicant. For example, if an applicant has moved frequently, checks in multiple states may be necessary.
- Plan for the time and financial resources needed to conduct background checks.
- Decide which offenses to examine in the background checks and which offenses will disqualify applicants. For child sexual abuse, absolute disqualifiers include violent behavior and

child sexual abuse perpetration history. Depending on the risk of the situation or the mission of your organization, drug and driving offenses may also be disqualifiers. Arrest data are not grounds for disqualification; only offenses resulting in convictions may be used.

- Develop procedures to keep the results of criminal background checks confidential. Select a secure storage location and limit access to the files.
- Ensure that your organization's process for conducting criminal background checks is legally sound. Consult county, state, and national laws and regulations, as well as your organization's attorney and insurance company, as needed.

Additional Strategies to Consider

Assessment of home environment

The need for assessing an applicant's home environment depends on the mission of your organization. This may be an essential strategy for mentoring programs where youth meet with mentors at their homes, but it may be irrelevant and inappropriate for other organizations, such as sleep-away camps or after-school programs.

Checking applicants against internal records

This strategy involves keeping lists of applicants who are disqualified during the screening process and employees/volunteers who are dismissed because of an offense. During the screening and selection process, your organization would then check current applicants against these lists to make sure the applicant has not been previously disqualified or dismissed.

Internet search

Some organizations may choose to search the internet to find additional relevant information about an applicant. Be aware that more than one person can share the same name and that it may be difficult to verify the accuracy of information found on the internet.

Component 2: Guidelines on Interactions Between Individuals

Goal

To ensure the safety of youth in their interactions with employees/volunteers and with each other.

General Principles

Guidelines on interactions between individuals should be determined by an organization's mission and activities. For example, organizations that promote one-on-one activities between adults and youth may need different interaction guidelines than programs built around group activities. Organizations should develop interaction policies before situations arise. The strategies listed below should be tailored to the developmental age and maturity of the youth and employees/volunteers. Strategies should also match the cultural context of the population served by the organization. In this section, "adult" refers to any individual in a supervisory position, including youth.

Balancing positive and negative

- Find a balance between encouraging positive and appropriate interactions and discouraging inappropriate and harmful interactions.
- Adopt strategies with this balance in mind to ensure that youth benefit from your program without risk of sexual abuse or harm.

Critical Strategies for Guidelines on Interactions between Individuals

Appropriate/inappropriate/harmful behaviors

Appropriate, positive interactions among youth and between employees/volunteers and youth are essential in supporting positive youth development, making youth feel valued, and providing the caring connections that serve as protective factors for youth. Conversely, inappropriate or harmful interactions put youth at risk for adverse physical and emotional outcomes. Organizations should identify behaviors that fall into the categories of appropriate, inappropriate, and harmful. These categorizations can be spelled out in your code of conduct or ethics. Carefully balance the benefits of appropriate interactions with the risks associated with inappropriate interactions. See page 10 for examples of appropriate/innappropriate/harmful behaviors.

Ratios of employees/volunteers to youth

The goal of setting ratios for the numbers of employees/volunteers to youth is to ensure the safety of the youth. There is no standard ratio for all situations. When making decisions about ratios, consider contextual variables such as:

- Age and developmental level of youth and employees/volunteers. If youth or employees/volunteers are young, you may need a lower ratio, that is, fewer youth per adult.
- Risk of the activity. Does it involve a great deal of isolation from others?
- Location of the activity. Is it in a classroom that is easy to monitor or at a park, where it is easier to lose track of individuals?

Encourage employees/volunteers to actively interact with the youth to maintain adequate supervision and monitoring. Even with a satisfactory ratio of employees/volunteers to youth, the youth are not being monitored if all of the employees/volunteers are immersed in their own conversations in a corner of the room.

Examples of Appropriate/Inappropriate/Harmful Behavior from Youth-serving Organizations

Sometimes it is unclear if a behavior is appropriate, inappropriate, or harmful. For example, intimate contact, such as kissing, may be developmentally appropriate for older youth, but may be inappropriate within the confines of the organization. It may even be harmful if the kissing is coercive. Another example involves hugging. Hugging may be appropriate and positive in some circumstances, but it can also be inappropriate if the child is not receptive, if the employee/volunteer is hugging too often or for too long, or if the contact is romanticized or sexually intimate.

Verbal communication

Appropriate:

- Praise
- Positive reinforcement for good work/behavior

Inappropriate/harmful:

- Sexually provocative or degrading comments
- Risqué jokes

Physical behavior

Appropriate:

- Pats on the back or shoulder

Inappropriate/harmful:

- Patting the buttocks
- Intimate/romantic/sexual contact
- Corporal punishment
- Showing pornography or involving youth in pornographic activities

One-on-one interactions

Some organizations have a policy to limit one-on-one interactions between youth and adults (i.e., having at least two adults present at all times with youth). The goal of such a policy is to prevent the isolation of one adult and one youth, a situation that elevates the risk for child sexual abuse. This strategy must be modified based on the mission of your organization.

- Limit one-on-one interactions whenever possible by having at least two adults present at all times with youth.
- Choose one of three options relating to this policy:
 - Make this a mandatory policy at all times.
 - Make this policy dependent on the risk of the activity or situation, such as overnight trips.
 - Maintain other safeguards such as extra supervision or contact with youth and employees/volunteers and more stringent screening if the mission of your organization requires one-on-one time between employees/volunteers and youth (e.g., mentoring programs).



Risk of interactions between youth

Your organization needs to address interactions among youth in addition to monitoring interactions between employees/volunteers and youth. Many strategies that focus on the interactions between employees/volunteers and youth can be tailored to address interactions among youth.

- Address all situations where unsupervised youth can sexually or physically abuse other youth. For example, if your organization has a policy that prevents adults from being present in locker rooms because of the risk of child sexual abuse, this may result in a situation where unsupervised youth can sexually or physically abuse other youth. A potential solution is adopting a policy that requires more than one adult to be present at all times.
- Develop policies to deal with bullying and sexual abuse so that positive interactions can be promoted while acknowledging that some interactions are inappropriate or harmful.

Prohibitions and restrictions on certain activities

Some activities, such as hazing and secret ceremonies, overnight trips, bathing, changing, bathroom interactions, and nighttime activities, pose greater risks for child sexual abuse. Prohibiting or restricting such activities will depend largely on the context of your organization. For example, a sleep-away camp would not be able to prohibit overnight trips or bathing.

Out-of-program contact restrictions

There are two types of out-of-program contact restrictions. The first type involves the contact of youth with employees/volunteers outside the context of the program. Your organization should limit contact between employees/volunteers and youth to organization-sanctioned activities and programs and/or to certain locations, such as activities within your organization's building.

The second type is contact between youth and people not affiliated with your organization that occurs while youth are under the care of your organization.

- Develop a system for monitoring the comings and goings of all youth and adults who enter and leave your facility. This system might include procedures for signing in and out.
- Develop specific policies about interactions between youth and people not affiliated with your organization if it is located in a building that houses more than just your program or if your organization's activities take place in public areas (e.g., sports field).

Caregiver information and permission

Your organization should obtain addresses and contact information for youth and caregivers (i.e., parents and guardians). This information should never be released to unauthorized individuals. Your organization also should obtain permission from caregivers for youth to participate in certain activities, such as field trips, late-night activities, and overnight trips.

- Inform caregivers about what their children/youth will be doing and where they will be going.
- Allow caregivers to have input on what activities or interactions they are comfortable with for their children.



Responsibility for youth

Your organization should clarify when it is responsible for youth and when caregivers are responsible.

- Develop a policy on when your organization starts and stops being responsible for youth.
- Consider who is responsible for youth before and after activities officially begin.
- Communicate the policy to caregivers and youth in writing. Organizations may also want caregivers to sign an acknowledgement that they have read and understand the policy.

Additional Strategies to Consider

Other ways to control interactions between individuals

Identify ways to monitor interactions, such as instituting a buddy system to prevent isolation of youth with employees/volunteers.