



The Massachusetts Legislative Task Force on the Prevention of Child Sexual Abuse



**Guidelines and Tools for the Development of Child
Sexual Abuse Prevention and Intervention Plans by
Youth-Serving Organizations in Massachusetts**

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REPORT OF THE MASSACHUSETTS LEGISLATIVE TASK FORCE
ON CHILD SEXUAL ABUSE PREVENTION¹

Co-Chairs:

Maria Mossaides, Director
Massachusetts Office of the Child Advocate

Suzin Bartley, Executive Director
The Children's Trust

“There is no task more important than building a world in which all of our children can grow up to realize their full potential, in health, peace and dignity.”

Kofi Annan, 7th Secretary-General of the United Nations (1997 – 2006)

FOREWORD

Children grow in communities, and developing new skills and relationships is deeply important. Youth Serving Organizations (YSOs) across the Commonwealth provide opportunities to dance, play, run, sing, learn and succeed. These organizations are committed to providing children and youth with safety and security. Ensuring that YSOs have the knowledge, tools, and incentives to prevent child sexual abuse is the responsibility of all who care for the children of the Commonwealth. This report is the first step in opening a dialogue and taking actions that will provide all children with safe places to grow.

The Massachusetts Legislative Task Force for the Prevention of Child Sexual Abuse is a statewide, multi-agency collaboration utilizing the collective experience of both public and private youth-serving agencies, offices, and organizations to create new frameworks, guidance and tools building on existing best practices and research for the safety and protection of our children, and the prevention of child sexual abuse. It was created by the Massachusetts Legislature (Section 34, Chapter 431 of the acts of 2014) and designated to be co-chaired by the Commonwealth's Child Advocate, and the Executive Director of the Children's Trust. The legislation designates as members nearly thirty organizations, offices, and elected and appointed officials, all of whom have given generously of their time, talent, expertise and perspectives to fulfill the important promise of ensuring that children are safe in our great Commonwealth.

¹ Prepared and Submitted Pursuant to MA Session Laws: Chapter 431, Acts of 2014

This report recommends policies and procedures for the implementation and oversight of the guidelines as well as strategies for incentivizing YSOs to develop and implement sexual abuse prevention and intervention plans. In the coming months, the Task Force will develop a specific implementation plan from the key recommendations of this report. The plan will include using community education and other strategies to increase public awareness about child sexual abuse, including how to recognize the signs, minimize opportunity, and act on suspicions or disclosures of such abuse.

We need the support of many to ensure that children are safe, healthy, and free from harm in their homes and at the many YSOs that support their healthy growth and development. We want the adults at all places that interact with young people – including sports clubs, recreation programs, dance studios, child and family service programs, educational facilities, etc. – to have all the skills, tools, and knowledge they need to ensure that children are thriving and free from harm. Violence against children can be prevented. As adults, it is our responsibility to keep all children safe from sexual abuse. We believe this report is an important step toward that goal.

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 1. Alliance of Massachusetts YMCAs
Peter Doliber
 2. Children’s League of Massachusetts
Erin Bradley

- Keely DeChristopher
3. Department of Children and Families
Lori Ann Bertram
 4. Department of Early Education and Care
Anne Connors
Commissioner Tom Weber
 5. Department of Elementary and Secondary Education
Anne Gilligan
 6. Department of Mental Health
Charity Bell-Lewitt
 7. Department of Public Health
Mark Bergeron-Naper
Carlene Pavlos
 8. Girl Scouts of Eastern MA
Diane Gauthier
Patricia Parcellin
Melanie Tavares-Wills
 9. House Chair of the Joint Committee on Children, Families and Persons with Disabilities
Representative Kay Khan
Lisa Rosenfeld
 10. House Minority Leader
Representative Susannah Whipps
 11. Massachusetts Adolescent Sex Offender Coalition
Melissa Gopnik
Joan Tabachnick
 12. Massachusetts After-School Partnership
Ardith Wieworka
 13. Massachusetts Alliance of Boys & Girls Clubs
 14. Massachusetts Association for Treatment of Sexual Abusers
Laura Guidry
 15. Massachusetts Children's Alliance
Tom King
 16. Massachusetts Citizens for Children
Jetta Bernier
 17. Massachusetts District Attorneys Association
Jennifer Franco
Tara Maguire
 18. Mass. Mentoring Partnership

- Marty Martinez
Chelsea Aquino
19. Massachusetts Office for Victim Assistance
Diane Coffey
Liam Lowney
20. Massachusetts Society for the Prevention of Cruelty to Children
Nancy Scannell
Meghan McGuirk
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22. Office of the Child Advocate
Maria Mossaides
Elizabeth Armstrong
Christine Palladino-Downs
Edie Rathbone
23. Office of the Lieutenant Governor
Tammy Mello
24. Roman Catholic Archdiocese of Boston
Vivian Soper
Maureen DiMilla
25. Senate Chair of the Joint Committee on Children, Families and Persons with Disabilities
Senator Jennifer Flanagan
Shannon Moore
26. Senate Minority Leader
Senator Bruce Tarr
Seth Yorra
27. Sex Offender Registry Board
Judy Norton
Laurie Myers
28. The Children's Trust
Suzin Bartley
Jack Miller
Anitza Guadarrama-Tiernan
Maureen Ferris

TABLE OF CONTENTS

Executive Summary.....	9
Introduction.....	11
Scope.....	14
What is Child Abuse and Neglect?.....	15
Recognizing Abuse and its Effects.....	17
Other Warning Signs.....	19
Long Term Effects.....	22
Prevention.....	23
How to Read This Report.....	24
Mission and Purpose of the Task Force.....	25
Brief History of How the Task Force was Organized.....	26
The Charge of the Legislative Language.....	26
Key Sections	
Section 1: Developing Policies and Procedures for Child Protection.....	26
Section 2: Screening and Background Checks for Selecting Employees and Volunteers.....	32
Section 3: Code of Conduct and Monitoring.....	53
Section 4: Ensuring Safe Physical Environments and Safe Technology.....	69
Section 5: Recognizing, Responding to, and Reporting Allegations and Suspicions of Child Sexual Abuse.....	89
Section 6: Training About Child Sexual Abuse Prevention.....	112
Additional Considerations.....	133
Implementation and Oversight.....	134
Communication.....	137
Analysis, Review/Self-Audit: Measuring Progress and Sustaining Outcomes.....	139
Community Partnerships.....	143
Applying the Framework: A Five-Year Plan.....	147
Community Based Outreach.....	149
Accessibility of the Report.....	149
Statewide Child Abuse Prevention Training for YSOs.....	150
Incentivization/Accreditation.....	151
Public Awareness Campaign.....	151
Sustainability Issues.....	152
Outstanding Issues.....	153
Legislative Recommendations.....	153
Appendices	
1. Definitions/Acronyms/Glossary.....	157

2. Legislative Mandate.....	161
3. Task Force Committees and Membership.....	163
4. Guest Presenters.....	165
5. Schedule of Meetings.....	166
6. Resources.....	167
Child Sexual Abuse (CSA) Prevention Evaluation Tool for Organizations.....	167
Sample Self-Audit form for YSOs.....	174
Sample Child Safety Incident After-Action Report.....	176
YSO Pledge for Child Safety.....	178
Reporting Child Abuse and Neglect.....	179
Massachusetts Prevention, Assessment, Treatment and Reporting Resources...	184
Section-Specific Appendices	
7. Policies and Procedures.....	191
8. Screening, Hiring and Licensing.....	194
9. Code of Conduct and Monitoring.....	206
10. Ensuring Safe Physical Environments and Safe Technology.....	224
11. Recognizing, Responding To, and Reporting Allegations and Suspicions.....	233
12. Training About Child Sexual Abuse Prevention.....	245

EXECUTIVE SUMMARY

This report, *Guidelines and Tools for the Development of Child Sexual Abuse Prevention and Intervention Plans by Youth-Serving Organizations in Massachusetts*, is the product of a two-year collaboration by the members of the Massachusetts Legislative Task Force on the Prevention of Child Sexual Abuse.² The report is intended to fulfill the Task Force's mandate by introducing readers to the realities of child abuse, neglect and exploitation, with an emphasis on child sexual abuse, and by providing guidance on the development of organizational policies and procedures, interventions, strategies and tools that youth serving organizations (YSOs) throughout the state can develop, adapt and employ – both to prevent the children and youth in their care from being harmed, and to recognize abuse that is occurring and intervene appropriately and effectively at the earliest possible time.

The Task Force has purposely taken an inclusive approach to the types of YSOs it wishes to address with these guidelines. Thus, rather than working with a singular focus on larger YSOs, or YSOs that have specific functions and/or membership, or on YSOs that are subject to licensure and certification by the state, the report attempts to address the child protection needs and concerns of any organization, establishment, facility, small business or club that provides services and activities for children and youth. This includes schools; medical and treatment facilities; youth groups; faith-based organizations; municipal and private camps, recreational and sporting clubs; mentoring services; and privately owned businesses and studios that provide instruction, personal development and skill-building services to children and youth (e.g., dance, martial arts, drama, tutoring, gymnastics, art, music, hobbies, etc.) to name a few.

Because of this inclusive focus, the goal of this document is not to present a set of prevention and intervention plans to be adopted as written, or a list of implementation and oversight practices to be employed in their entirety, or even a set of tools to be used as presented. Whether serving a single teen, 10 dancers, or 100,000 students, there is no “one-size-fits-all” answer to keeping children and youth safe. Rather, the goal is to present a *process* - grounded in best practices - by which YSOs can be presented with the various building blocks of a comprehensive child abuse prevention program, know which of those elements represent (and why) a set of minimum required safety practices and standards, and receive guidance on the decisions and thought process that will help them use the concepts and resources in this report to assess and strengthen their current safety practices, and/or to craft a safety program best suited to their individual community, function, culture and circumstances.

² See Appendix 2 for the Legislative Mandate, and Section VI and Appendix 3 for committees and membership.

We know that child abuse can be prevented. But before we can prevent it, we must understand what it is, how to recognize it, and how it occurs. The introduction to the report provides a basic tutorial on the numbers and types of child abuse victims both nationally and in Massachusetts, and provides the state-specific definitions of the different kinds of child abuse, neglect and exploitation.

Also included are the physical and behavioral symptoms exhibited by children and youth who are being subjected to physical, sexual, or emotional abuse or neglect. Unfortunately, by the time these symptoms are noted, the abuse has likely already taken place. Prevention strategies must therefore be aware of precursor or “grooming” behaviors exhibited by those who would harm children and youth. Since these behaviors can take place for significant periods of time before the actual abuse takes place, they are a prime focus for intervention. These behaviors are defined and categorized. Research results on the long-term effects of child abuse and neglect are also summarized.

As mentioned above, the bulk of the report is focused on presenting the elements of effective abuse prevention and intervention practices and tools, and a decision-making process that can be used by individuals or groups to tailor them to the needs of a variety of YSO types, sizes, and functions. The elements address the establishment of:

- An overarching set of abuse prevention policies and procedures;
- A screening and hiring process for employees and volunteers that can help to detect and deter applicants who should not be placed in positions of trust with minor children;
- A code of conduct that details the expected and prohibited behaviors and interactions between employees, volunteers, children and youth;
- Methods and concepts that help to create and maintain a safe physical environment, and establish safe boundaries for the use of social media and other electronic technologies;
- Protocols that guide employees and volunteers in responding appropriately to a child/youth who discloses abuse, and that identify the internal and external persons and agencies to be contacted when abuse is suspected, observed or disclosed, and;
- An onsite and/or online child abuse prevention training and education program for all staff, employees, and volunteers (and for some YSOs this may include personal safety education for children and youth) that includes training in the policies and procedures specific to the YSO.

Each of the elements is addressed in conceptual as well as in practical terms, and includes a combination of definitions, examples, scenarios, sample and model documents, tools, reference materials, and guidance on potential issues and recommended implementation strategies.

Finally, the report addresses the basic elements of organizational change and the critical role of leadership – not only in making the case for the new safety initiatives, but in ensuring a wide collaboration among all those who will be affected by them (e.g., managers, supervisors, employees, volunteers, parents, and children and youth). That collaboration must consider both the strategy for implementing the programs, and the organizational culture in which the changes and new processes are going to take place. Maintaining forward movement in the safety program will depend on monitoring, assessment, feedback, open lines of communication, encouragement, and sustained engagement – all focused on the desired outcomes. But sustaining such an achievement into the future, and the permanent behavioral changes it requires, will demand a sense of individual and group ownership.

Beyond providing guidelines and tools for the development of child sexual abuse prevention and intervention plans for YSO's in Massachusetts, the Task Force was charged with recommending strategies for incentivizing the YSOs to develop and implement abuse prevention and intervention plans. The group was also tasked with creating a 5-year plan for using community education and other strategies to increase public awareness about child sexual abuse, including how to recognize signs, minimize risk, and act on suspicions or disclosures of such abuse as a community responsibility.

Various ideas are presented as to how the Task Force will accomplish these tasks, including a community outreach and “listening session” (to be conducted prior to publication of this Report) that will pave the way for a series of regional consultations with both large and small, public and private YSO businesses and communities to solicit feedback on what they would need in order to facilitate a successful implementation of the recommendations contained in the Task Force report. That feedback will help to guide and inform the ongoing implementation focus the Task Force envisions as the basis of our future work.

INTRODUCTION

Children are our most precious resource. When we look into the face of a child we love, we see wonder at every new experience, an openness to the world that is fearless, and a response to human interaction that is both trusting and inviting. We also see an innocence and dependency that make us want to guide, to defend and to protect the child unconditionally – without regard to personal consequence. All children have the right to be protected, to grow, to thrive and to be

educated in a safe, secure, and caring environment until the time comes for them to “leave the nest” and establish their place in the wider world. Our children’s/youth’s health, development, survival and dignity are both our legacy and our future.

For many reasons, however, not all children and youth experience their communities, their schools or their homes as safe places. Child abuse, neglect and exploitation affect millions of children in every community in the United States annually and tens of millions more around the globe. Sexual violence against children and youth, in particular, is a reality that lives outside the consciousness of most people and inside a web of silence, secrecy and stigma – until the bold headlines in our newspapers remind us that it still exists.

No one *likes* to talk about child abuse. It is a difficult topic that reveals sides of human nature that are hard to acknowledge, and pathologies that are hard to understand. And yet, it has been around throughout recorded human history and most likely even before that. We know that child abuse happens without regard to ethnic, racial, religious, or cultural grouping or socio-economic status. No population is immune. This report will not attempt to provide a comprehensive explanation of why child maltreatment exists. Rather, it will focus on the fact that it does exist, and can take place anywhere under the right conditions and circumstances – but, most importantly, child abuse can also be prevented.

There are an estimated 1.4 million children and youth in the Commonwealth under the age of 18³ who are served daily by a variety of educational institutions, day care facilities, youth development programs, camps, medical facilities, recreation centers, clubs, studios, and faith-based programs to name a few. These “youth serving organizations” (YSOs) can range from a small privately owned business in a rented storefront with a single owner, a small number of employees and tens of children; to a city or town run sports league with hundreds of coaches, assistant coaches and participants; to a state school system with tens of thousands of teachers, employees and volunteers and hundreds of thousands of children. What they all have in common is a desire to teach, mentor, train, inspire and otherwise engage children while at the same time trying to ensure that they are safe and without injury or harm while doing so.

What we know, however, is that children and the organizations that serve them can be vulnerable. Individuals who wish to harm children sometimes succeed in joining YSOs – bypassing the safeguards that are in place, and using the opportunity to cultivate relationships with both the adults and children in the organization that eventually allow them to succeed.

³ <http://www.census.gov/quickfacts/table/PST045215/25>

The Massachusetts Legislative Task Force on Child Sexual Abuse Prevention has worked together to better understand how this situation happens, on the conditions and circumstances that can allow it to occur, and on the challenges that both large and small organizations face in the detection and prevention of child sexual abuse. The Task Force has used this work to develop a set of strategies, guidelines and tools that can address the conditions that lead to sexually abusive behaviors in YSOs. The resulting prevention framework consists of a combination of raising public awareness, education and training, a prevention toolbox, and on strength-based models and strategies to detect and prevent abusive behavior in the organizations that serve Massachusetts children (See Figure 1 below). Practical guidance is also offered on the implementation of these strategies, and on leadership’s role in building an organizational culture of oversight and accountability.

Figure 1



SCOPE

The Children's Bureau of the U.S. Department of Health and Human Services collects national child abuse incidence data on an annual basis and posts the most recent data on its website. Its most recent report, *Child Maltreatment 2015*⁴ (published in January 2017) reported that an estimated 4 million referrals, involving the alleged maltreatment of approximately 7.2 million children were received by Child Protection Services (CPS) agencies across the country. Of the substantiated allegations, a little more than 75 percent of the children suffered from neglect, about 17 percent suffered physical abuse, and a little more than 6 percent suffered emotional or psychological abuse⁵. The report also estimated that 1,670 children died from abuse and neglect.

Approximately 8.4 percent of the cases involved sexual abuse. It has been estimated in various studies that 25-40% of women and 8-13% of men experience at least one episode of sexual abuse victimization before they reach their 18th birthday.^{6,7}

Sexually abusive acts can include sexual penetration, sexual touching, sexual exploitation or non-contact sexual acts such as exposure, voyeurism and showing a child pornography. National statistics also indicate that, instead of strangers, the majority of these sexual offenses (about 85 percent) are carried out by a person in the child's family or social network.⁸ Another common misperception is that it is only adults who sexually assault children. Approximately 40 percent of those who commit sexual offenses against children under the age of 11 years are juveniles – many of whom have been victimized themselves.⁹ Unfortunately, however, estimates are that between 70 and 90 percent of child sexual abuse cases are never reported. The under-reporting of sexual abuse is so high that we must address specifically what researchers now document is affecting as many as one in ten children nationwide.

Closer to home, the scope of child abuse and neglect in Massachusetts is no less concerning. In the same calendar year (2015), the Massachusetts Department of Children and Families (DCF)

⁴ U.S. Department of Health & Human Services, Administration for Children and Families, Administration on Children, Youth and Families, Children's Bureau. (2017). *Child Maltreatment 2015*. Available from <http://www.acf.hhs.gov/programs/cb/research-data-technology/statistics-research/child-maltreatment>

⁵ The percentages add up to more than 100 percent because some children were the subject of multiple allegations

⁶ Bolen, R. M., & Scannapieco, M. (1999). Prevalence of child sexual abuse: A corrective meta-analysis. *Social Service Review*, 73, 281-313.

⁷ Finkelhor, D. (2009). The prevention of childhood sexual abuse. *The Future of Children*, 19(2). (http://futureofchildren.org/futureofchildren/publications/docs/19_02_08.pdf).

⁸ Finkelhor, *The prevention of childhood sexual abuse*, *The Future of Children*, 169 (2009), (http://www.princeton.edu/futureofchildren/publications/docs/19_02_08.pdf) (Visited 10/12/16).

⁹ Snyder, *Sexual Assault of Young Children as Reported to Law Enforcement: Victim, Incident and Offender Characteristics* (2000), National Center for Juvenile Justice, NCJ 182990. (<http://www.bjs.gov/content/pub/pdf/saycrle.pdf>).

received 91,494 reports of the alleged abuse or neglect of children under the age of 18. Almost 60,000 reports were screened in for a response. Following the DCF response, the number of supported allegations of abuse/neglect or concerns for risk represented the maltreatment of a minor child in Massachusetts every 11-12 minutes. As of April 2016, DCF was serving 101,752 open consumers across the Commonwealth.

WHAT IS CHILD ABUSE AND NEGLECT?

For purposes of this report, the words “child” and “youth” are sometimes used interchangeably. Massachusetts law¹⁰ on the care and protection of children defines a child as a person under the age of 18. However, when a distinction needs to be made that differentiates younger and older minors by age or developmental stage, a child is defined in this report as an individual between newborn and age 11, and a youth is defined as an individual between age 12 and the attainment of their 18th birthday.

Child maltreatment can be defined generally as any type of cruelty inflicted upon a child, including mental or emotional abuse, physical harm, neglect, sexual abuse, sexual exploitation or human trafficking (both sex trafficking and labor trafficking). It is not uncommon for a child to be the victim of several types of maltreatment at the same time.¹¹ All states have child abuse prevention statutes and regulations that define these basic categories, but specifics do vary. DCF regulations (110 CMR, Section 2.00)¹⁴ offer the following definitions of the various types of child abuse and neglect for the Commonwealth:

Abuse: The non-accidental commission of any act by a caretaker upon a child under age 18 which causes, or creates a substantial risk of physical or emotional injury; or constitutes a sexual offense under the laws of the Commonwealth; or any sexual contact between a caretaker and a child under the care of that individual. This definition is not dependent upon location (i.e., abuse can occur while the child is in an out-of-home or in-home setting).

Neglect: Failure by a caretaker, either deliberately or through negligence or inability, to take those actions necessary to provide a child with minimally adequate food, clothing, shelter, medical care, supervision, emotional stability and growth or other essential care;

¹⁰ MGL, Chapter 119, Section 21

¹¹Finkelhor, D., Turner, H., Hamby, S., and Ormrod, R. (2011). *Polyvictimization: Children's Exposure to Multiple Types of Violence, Crime, and Abuse*. National Survey of Children's Exposure to Violence, Office of Juvenile Justice and Delinquency Prevention, Bulletin: <https://www.ncjrs.gov/pdffiles1/ojjdp/235504.pdf>

provided, however, that such inability is not due solely to inadequate economic resources or solely to the existence of a handicapping condition. This definition is not dependent upon location (i.e., neglect can occur while the child is in an out-of-home or in-home setting).

Emotional Injury: Is an impairment to or disorder of the intellectual or psychological capacity of a child as evidenced by observable and substantial reduction in the child's ability to function within a normal range of performance and behavior.

Physical Injury: Death, or fracture of a bone, subdural hematoma, burns, impairment of any organ, and any other such nontrivial injury; or soft tissue swelling or skin bruising, depending on such factors as the child's age, circumstances under which the injury occurred, and the number and location of bruises; or addiction to a drug or drugs at birth; or failure to thrive.

Institutional Abuse or Neglect: Abuse or neglect which occurs in any facility for children, including, but not limited to, group homes, residential or public or private schools, hospitals, detention and treatment facilities, family foster care homes, group day care centers and family day care homes.

Sexually Exploited Child:¹² Any person under the age of 18 who has been subjected to sexual exploitation because such person:

- Is the victim of the crime of sexual servitude pursuant to section 50 of chapter 265 or is the victim of sex trafficking as defined in 22 United States Code 7105.
- Engages, agrees to engage or offers to engage in sexual conduct with another person in exchange for a fee, in violation of subsection (a) of section 53A of chapter 272, or in exchange for food, shelter, clothing, education or care.
- Is a victim of the crime of inducing a minor into prostitution under section 4A of chapter 272.
- Engages in common night walking or common streetwalking under section 53 of chapter 272.

Human Trafficking:¹³ A person who is subjected to harboring, recruitment, transportation, provision, obtaining, patronizing, or soliciting for the purpose of:

¹² as defined in MGL c. 119, § 21

¹³ based on MGL c. 233, § 20M and MGL c. 265, §§ 50 and 51

- Sex trafficking (i.e., inducement to perform a commercial sex act, forced sexual services and/or sexually explicit performance).
- Labor trafficking (i.e., forced services, involuntary servitude, peonage, debt bondage or slavery).

For additional information about what adults must do under the law when child maltreatment is suspected, observed or disclosed see Section 5: “Recognizing, Responding to, and Reporting Allegations and Suspicions of Child Sexual Abuse” below.

RECOGNIZING ABUSE AND ITS EFFECTS

Most instances of maltreatment are never observed, and the majority of children who are its victims do not self-disclose. Many adult survivors of childhood abuse – especially sexual abuse – delay the disclosure of their abuse for years or decades. The longer child abuse remains undiscovered the greater the possibility of negative long-term effects. Early detection and intervention are key, but not knowing how to talk about it, the fear of being blamed or disbelieved, threats of consequences by the abuser, or the feeling that they were somehow at fault prevents many victims from disclosing their abuse.

For these reasons, the prevention of child maltreatment, or its discovery at the earliest possible time, depends in part on the ability of adults to recognize the warning signs and symptoms that children show when they are experiencing abuse and neglect. In cases of sexual abuse, some of the behavioral signs (both of the children who are being targeted, and the individuals who abuse them) can occur *prior* to the act of abuse and can possibly be used – if recognized – to prevent the abuse from taking place. These are discussed more fully in Section 5 below.

Obvious physical signs of child abuse are usually easily visible, and may be mild or severe or, in some cases, more subtle. Behavioral indicators usually, but not always, accompany the physical manifestations of child abuse and neglect. Of course, it is important to note here that not all physical injury is the result of child abuse. Children and youth are prone to many injuries on knees, shins, elbows and chins that are the result of normal play and activity. But when normal behaviors, injuries, or a combination of the two fall outside of those ranges, it should be a cause for concern. It is therefore helpful for all adults to be aware of the following physical and behavioral symptoms of child abuse and neglect:

Indicators of physical abuse

While injuries can occur accidentally when a child is at play, physical abuse should be suspected if the explanations do not fit the injury, or if a pattern of frequency is apparent

(for example, handprints or multiple marks of a belt or cord). The presence of many injuries in various stages of healing makes it obvious that the injuries did not all occur as the result of one accident. Physical indicators of abuse include bruises, lacerations, swollen areas, and marks on the child's face, head, back, chest, genital area, buttocks or thighs. Wounds like human bite marks, cigarette burns, broken bones, puncture marks or missing hair may indicate abuse. A child's behavior might also signal that something is wrong. Victims of physical abuse may display withdrawn or aggressive behavior, complain of soreness or uncomfortable movement, wear clothing that is inappropriate for the weather, express discomfort with physical contact or become chronic runaways.¹⁴

Indicators of emotional abuse

Although the visible signs of emotional abuse in children can be difficult to detect, the hidden scars of this type of abuse manifest in numerous behavioral ways, including insecurity, poor self-esteem, destructive behavior, angry acts (such as fire setting and animal cruelty), withdrawal, poor development of basic skills, alcohol or drug abuse, suicide attempts, difficulty forming relationships and unstable job histories. Emotionally abused children often grow up thinking that they are deficient in some way. A continuing tragedy of emotional abuse is that, when these children become parents, they may continue the cycle with their own children.¹⁵

Indicators of sexual abuse

The physical indicators of child sexual abuse include pain or irritation to the genital area, difficulty walking or sitting, vaginal or penile discharge and difficulty with urination. Some children contract venereal disease as a result of being abused. In addition, children who are sexually abused may exhibit behavioral changes based on their age. Children up to age 3 may exhibit fear or excessive crying, vomiting, feeding problems, bowel problems, sleep disturbances, or failure to thrive. Children ages 2 to 9 may exhibit a fear of particular people, places or activities, regression to earlier behaviors such as bed wetting or stranger anxiety, victimization of others, excessive masturbation, feelings of shame or guilt, nightmares or sleep disturbances, withdrawal from family or friends, fear of the attack recurring, eating disturbances, sexual provocativeness, and knowledge of sexual activity beyond their years. Symptoms of sexual abuse in older youth and adolescents include depression, nightmares or sleep disturbances, poor school performance, promiscuity, substance abuse, aggression, running away from home, fear of attack recurring, eating disturbances, early pregnancy or marriage, suicidal gestures,

¹⁴ American Humane Association, Fact sheet, accessed September 6, 2016, <http://www.americanhumane.org/children/stop-child-abuse/fact-sheets/child-physical-abuse.html>

¹⁵ Iwaniec, D. (2006). *Emotional Abused and Neglected Child: Identification, Assessment and Intervention*. New York: John Wiley and Sons.

anger about being forced into situations beyond one's control, and pseudo-mature behaviors.¹⁶

Indicators of neglect

Children who are the victims of persistent neglect are unhappy, have poor emotional and social support, and appear to be lonely and isolated. Their disturbed behavior reflects inner turmoil, distress, and confusion. Their development is delayed and problematic, and their attachments to their parents or caregivers are insecure. Parental relationships with these children are often hostile, neglectful, rejecting, dismissive, or paralyzing of development of individuality and independence. They suffer from low self-esteem, believing that they are not worthy of being loved, wanted, or able to achieve anything in lives. They seem to be in a never-ending state of stress, anxiety, and uncertainty. Their relationships with other children lack assertiveness and personal appeal, and their educational achievements are poor.

OTHER WARNING SIGNS

Grooming

Another, often overlooked but no less important group of warning signs are those behaviors manifested by the perpetrators of child abuse – particularly child sexual abuse. Once an offender selects a potential victim, he or she will prepare for the abuse through a process called *grooming*. Grooming is a method by which sexual offenders engage children and their caretakers so that the abuse can occur with minimal risk of detection. Although it is impossible to describe a “typical” child abuser, there are common patterns of grooming behavior that offenders use to prepare their victims, as well as the victims’ families and communities. Knowledge of these behaviors is an important aspect of prevention since they typically occur over time and precede the actual act of abuse.

There are four commonly recognized preconditions for child sexual abuse to take place.¹⁷ The offender must:

1. Have the desire to sexually abuse a child;
2. Overcome the internal inhibitions that would ordinarily keep one from acting on sexual desires toward children;
3. Have the opportunity to be alone with the child; and
4. Overcome the child's resistance.

¹⁶ Cynthia Crosson-Tower, *Understanding Child Abuse and Neglect* (Boston: Allyn and Bacon 2010).

¹⁷ Finkelhor, David. (1984). *Child Sexual Abuse: New Theory and Research*. New York: The Free Press, 1984.

Grooming behaviors target bullets 3 and 4. The process can take from a few days to as much as a year (one recent study has placed the average at 1.5 years¹⁸), but offenders have been shown to be patient in their efforts to gain the trust of everyone involved and avoid being caught. The grooming process has three basic elements that are separate but interrelated. These include the physical and psychological grooming of the child or youth (and family), and grooming of the community.

Physical grooming involves desensitization to touch. Starting with innocent pats on the back or arm, an acceptable form of touching a younger person, the offender progresses the touch to hugging, tickling, and wrestling. Over time, this conditions the child/youth to increasing levels of physical contact. The potential victim feels that nothing is wrong because he or she basically interprets the touch as like one given from a loving parent. If the offender senses that the child/youth is becoming uncomfortable, they will back off and try again later. The offender uses these skills to make the child/youth increasingly receptive to their touch – eventually progressing to sexual contact.

Psychological grooming is used with both the child and the family. Offenders spend time with their victims; they show children attention and use any possible method of communication that allows the child to feel they are on the offender's level and that the offender understands them. Offenders try to become "friends" to their victims - friends with power and thus, control - and use their power and control over the victims as a way of eliciting cooperation. Special gifts, treats, breaking of rules, foods they might not be allowed to eat at home, trips, and attention allow for a deep connection to be forged between the molester and the child. If the child shows signs of pulling away, the offender shows signs of feeling rejected and unhappy, and the child feels guilt and confusion. Offenders sometimes even resort to physical threats to the family, pets, or friends if the child wants to discontinue this "special relationship." At the same time, offenders groom the parents or other caretakers who may feel happy that another adult is showing their child attention, and allow increasing levels of independent access – both inside and outside of the home. The result of these tactics is for the offender to ultimately isolate and confuse the child into feeling responsible for, or complicit in the abuse (one of the primary reasons children do not report).

Community grooming is the way in which offenders create a controlled environment around themselves. Offenders are skilled in projecting an image to others (employers, parishes, community organizations, YSOs, etc.), that they are responsible and caring citizens. As a result, they are placed in positions of trust, are allowed unmonitored or unsupervised access to children and youth, and are thereby given greater access to their eventual victims. If a suspicion or

¹⁸ Leclerc B. & Cale, J. (2015). Adult sex offenders in youth-oriented institutions: Evidence on sexual victimization experiences of offenders and their offending patterns. *Trends & Issues in Crime and Criminal Justice*. 497.

allegation comes forward, it is easily explained away by adults in the organization who have been groomed by the offender to think that they would never harm a child. In this way, the community unwittingly enables the offender, and confirms what the offender has told the child/youth as part of the grooming process – that if they tell, they will not be believed.

But knowledge is power. As with the physical and behavioral symptoms of child abuse and neglect described above, these grooming activities and their associated behaviors can also serve as warning signs which, if noticed, can be used to prevent the abuse from occurring, or to discover the abuse at the earliest possible time.

The behavioral signs of grooming include individuals who:

- Always want to be alone with the child, especially in places that are not easily monitored;
- Discourage other adults from being involved when they are with the child;
- Prefer the company of the child to adults;
- Create opportunities to be alone with the child outside their designated role (for example, as a teacher, coach, etc.);
- “Accidentally” expose themselves to the child on several occasions;
- Allow or encourages a child to do things that parents do not permit;
- Believe that the “rules” do not apply to them;
- Use excessive physical touching with the child—hugging, kissing, tickling, holding—even when the child does not ask for it;
- Demonstrate a great deal of interest in the child’s sexual development;
- Lack respect for the child’s privacy and personal boundaries;
- Show an interest in the child that feels “too good to be true”;
- Use sexual jokes or language or “accidentally” expose the child to pornography;
- Make excessive comments about the child’s developing body;
- Give the child gifts without permission of caretakers and demand secrecy around these gifts; and
- Minimize concerns about how they are interacting with the child.

Knowledge about the scope of the problem, the definitions of the various types of child maltreatment, the symptoms that children and youth exhibit when they are abused, and the predictive behaviors of those who would harm them can all serve to help build prevention strategies that YSOs can use to protect the children and youth in their care. Make no mistake - perpetrators of child sexual abuse are active decision-makers, and they continuously evaluate the likelihood of successfully committing this crime while balancing the odds against the possibility

of being caught. The prevention strategies contained in this report are designed to help YSOs of all sizes alter these calculations by sending a public message to would-be offenders that the likelihood of successfully abusing a child has decreased, while the risks of their behaviors being noticed and reported has increased.

LONG TERM EFFECTS

In addition to the more near term physical and behavioral signs of child and youth maltreatment, there is also substantial evidence that the effects of child abuse and neglect can have lifelong consequences.¹⁹ The Centers for Disease Control (CDC) in partnership with the Kaiser Permanente Health Appraisal Clinic in San Diego determined a cause and effect relationship between early childhood trauma (including child abuse and neglect) and later life health and well-being. The Adverse Childhood Experiences study (or ACEs) included more than 17,000 Health Maintenance Organization (HMO) members undergoing a comprehensive physical examination who chose to answer a questionnaire that asked them to provide information about experiences of abuse, neglect, and family dysfunction while they were growing up, as well as the details of their current health status and behaviors. The study findings suggest that certain childhood experiences are major risk factors for the leading causes of illness and death as well as poor quality of life in the United States. Progress in preventing and recovering from some of the nation's worst health and social problems is likely to benefit from understanding that many of these problems arise as a consequence of early childhood trauma.

The ACE study questionnaire asked respondents to indicate whether they had experienced any of three categories of childhood abuse: recurrent psychological (emotional) or physical abuse, or contact sexual abuse. Questions about exposure to four categories of household dysfunction during childhood included: exposure to substance abuse (by a household member); mental illness (someone who was chronically depressed, institutionalized, or suicidal); violent treatment of a mother or stepmother; and criminal behavior in the household. Respondents were defined as exposed to a category if they responded “yes” to 1 or more of the questions in that category. Thus the possible number of exposures ranged from 0 (unexposed) to 7 (exposed to all categories).²⁰

The researchers then conducted statistical analyses of the relationship between the self-reported level of exposure to childhood abuse and family dysfunction (0-7) and the health issues that the

¹⁹ Felitti VJ1, Anda RF, Nordenberg D, Williamson DF, Spitz AM, Edwards V, Koss MP, Marks JS., *Relationship of childhood abuse and household dysfunction to many of the leading causes of death in adults. The Adverse Childhood Experiences (ACE) Study* (1998 May) *American Journal of Preventive Medicine*;14(4):245-58.

²⁰ In subsequent ACEs studies, additional categories were added.

physical examinations revealed in the respondents. The results showed a strong and consistent relationship between the level of exposure to childhood trauma and numerous organic diseases. For example, a person with an ACEs score of 4 or higher is 260% more likely to have chronic obstructive pulmonary disease (COPD) than a person with an ACEs score of 0. Similarly, persons with ACEs scores higher than 4 were found to be 240% more likely to have hepatitis, 250% more likely to have a sexually transmitted disease, and 460% more likely to suffer from depression than persons with no exposure to childhood trauma. Persons reporting a high ACEs score of 7 were found to be up to 360% more likely to suffer from coronary artery disease than those reporting low or no exposure to childhood abuse or family dysfunction.

The results indicate that child abuse and neglect – either by themselves or in combination with other elements of family dysfunction – are related to multiple risk factors for several of the leading causes of death in adults in the United States, and that the impact of these experiences on adult health status is strong and cumulative.

Further research spun off from the ACEs study has found similar relationships between childhood trauma and normal neurological and hormonal function. In other words, exposure to childhood trauma can actually cause long term changes in brain chemistry and function, as well as in the body's hormonal balance. These, in turn, have been linked to appetite, the way the body ultimately distributes abdominal fat, the regulation of blood pressure, immune function, inflammatory responses, the regulation of sleep/wake cycles, and the formation of memory.

It is clear from these studies that child abuse is bad for normal health and development in a number of ways. Beyond the psychological and emotional effects that we have come to understand as the consequence of childhood abuse and neglect, we are now learning that its effects are lifelong and life threatening in ways that were unimaginable only a few years ago. Yet the authors themselves, in the closing remarks of the study, point to a number of societal and community strategies as essential in combating the problem of adverse childhood experiences – the very *first* being strategies that include the prevention of their occurrence.

PREVENTION

A comprehensive child abuse prevention framework is a *PROACTIVE* framework: a proactive child abuse prevention framework helps to identify and prevent child abuse before it occurs, or ensures its earliest possible detection and reporting. The elements of such a framework are:

- Policies and procedures

- Screening, hiring and criminal background checks
- Codes of conduct and monitoring
- Safe physical environments and safe technology
- Responding and reporting
- Education and training (for adults and children)

This report presents these elements in turn, and provides information and detail about what they are, how they prevent child maltreatment, the requirements and best practices standards that make them effective, the strategies and tools that can be used to create and sustain them, and guidance about how to tailor and incorporate them into Massachusetts YSOs of various sizes and populations in order to maximize their effectiveness. Additional elements to be discussed that support the effectiveness of prevention frameworks and lend themselves to their sustainability include:

- Child protection teams
- Community partnerships
- Measurement, analysis, self-audits and sustainment actions
- Communication

HOW TO READ THIS REPORT

The sections of this report describe for YSOs the steps the Task Force recommends they should take to build environments for children and youth that will help keep them safe from abuse – with a focus on preventing the sexual abuse and exploitation of minors. Since this report is intended for use by YSOs of varying sizes – some of which may have no prior experience with issues of child abuse and its prevention, or may have limited resources and personnel – each of the building blocks above is explained in detail. With the exception of Section 1, which is a general introduction to the concepts of building policies and procedures, each section that follows begins with an Executive Summary, a set of implementation guidelines, examples, toolkits, sample documents, forms and checklists, and a set of Key Findings and Recommendations. Also described are a set of “minimum required standards” that are based on best practices in child protection, and are intended to be used by YSOs as a starting point – both to measure their current safety frameworks – and/or to build new ones.

The guidelines also provide organizations with practical examples of steps they can take to implement the minimum standards, and to determine if a more comprehensive framework is needed. A 3-step “Implementation and Decision Making Model” is then presented to help YSOs:

1. Determine how many of the basic, minimum safety requirements are in place;
2. Identify the risks, requirements, issues and questions leadership should consider to determine if additional safety elements may be appropriate based on their circumstances, activities and responsibilities, and;
3. Decide which additional safety elements beyond the minimum requirements are necessary to augment their existing prevention framework.

The 3-step Implementation and Decision Making Model is presented twice in the sections – once at the end of the Executive Summary, and then again at the end of the section itself. This is done to present the model to the reader as both an initial set of questions and concepts to think about while reading the section, and then later as a framework for decision making informed by the content and details of the section.

In these ways, it is hoped that all YSOs, no matter their size, function or constituency, will be able to build greater awareness of the issues of child abuse and neglect among their staff, volunteers, parents, and children and youth; evaluate their current safety protocols; and prioritize the methods and strategies they can use to keep their children safe.

MISSION AND PURPOSE OF THE TASK FORCE

In 2014, the Massachusetts Legislature authorized the creation of a task force on child sexual abuse prevention (SECTION 34. Chapter 431 of the acts of 2014, as amended) to be co-chaired by the state’s Child Advocate and the executive director of the Children’s Trust.

The basic purpose of the Task Force is to develop the guidance, tools and sexual abuse prevention and intervention frameworks that will support Massachusetts YSOs in their efforts to better protect the children and youth entrusted to their care, and to create long range plans and strategies for statewide community education about child sexual abuse and its prevention (see the specific Legislative language in Appendix 2).

The legislation also designates certain elected and appointed officials (or their designees) and organizations to serve on the Task Force, and further states that the governor may appoint additional representatives from agencies serving children, law enforcement, religious organizations and others as necessary to fulfill the purpose of the Task Force.²¹ The legislative mandate and Task Force and committee membership can be found in the appendices below.

²¹ See: <https://malegislature.gov/Laws/SessionLaws/Acts/2014/Chapter431>

BRIEF HISTORY OF HOW THE TASK FORCE WAS ORGANIZED

The first meeting of the Task Force took place on April 30, 2015 at the offices of the Massachusetts Children’s Trust, 55 Court Street Boston, MA, and the group has met monthly since that time. Five Committees were formed to author the major areas of the eventual report and an individual Chairperson was designated for each. These subcommittees set their own agendas and met at their own discretion as they produced and refined the sections on their assigned topics. The Committee Chairs also met monthly with the Co-Chairs of the Task Force – again at the Children’s Trust – since that time.

THE CHARGE OF THE LEGISLATIVE LANGUAGE

1. Develop guidelines for the development of sexual abuse prevention and intervention plans by organizations serving children and youth
2. Develop tools for the development of sexual abuse prevention and intervention plans by organizations serving children and youth
3. Recommend policies and procedures for implementation and oversight of the guidelines
4. Recommend strategies for incentivizing such organizations to develop and implement sexual abuse prevention and intervention plans
5. Develop a 5-year plan for using community education and other strategies to increase public awareness about child sexual abuse, including how to recognize signs, minimize risk and act on suspicions or disclosures of such abuse.

KEY SECTIONS

SECTION 1: Developing policies and procedures for child protection

Youth serving organizations come in many shapes and sizes – public and private schools, Boys and Girls Clubs, Scouts, mentoring programs, YMCAs, after school programs, child care centers, municipal sports organizations, Big Brothers and Big Sisters, day and overnight camps, and studios and clubs for dance, arts and crafts, drama, music, acrobatics, and the martial arts to name a few. No matter how large or small, or the services they provide, all YSOs have at least one thing in common – they want to keep their children and youth safe from harm. An organization’s policies and procedures for child safety and abuse prevention are the backbone of its efforts to protect children and youth, and provide an overarching framework that should present, first and foremost, its commitment to the safety and well-being of the children and youth entrusted to its care. It is upon this foundation that all other elements will rest, and from which

the safety components and strategies described throughout this report will draw their meaning and credibility.

Child protection policies must be developed with the organization's mission and circumstances in mind. For example, an organization that provides youth mentoring may need to adopt prevention strategies for one-on-one activities between youth and staff/volunteers that would differ from those adopted for team sports activities in which most activities take place in a group. Similarly, prevention strategies for a studio with a single, storefront location will likely differ from those of a statewide agency with multiple dedicated sites and scores of programs. Well-written policies, procedures and/or guidelines provide the means for *any* YSO to clearly express, in a public way, a commitment to its parents, to its community and to the children and youth it serves by outlining the steps it takes to protect children and youth from sexual and other forms of abuse; the type of environment it strives to build and maintain; and the safeguards it employs to ensure that all staff, employees and volunteers are properly vetted and trained to recognize and respond to inappropriate and/or harmful behaviors. Thus, effective policies focus both on the creation and maintenance of safe, preventive environments for children and youth, as well as on the responsible management of incidents or alleged incidents of abuse.

Policies for Massachusetts YSOs should clearly identify the duties and responsibilities of all staff, reflect both Federal and Massachusetts abuse reporting laws, provide direction to employees, staff, and volunteers who wish to make a report, and define the internal mechanisms to be followed when a case of child abuse or neglect is suspected and/or being reported. When a crisis occurs, having a clearly defined and recognized set of policies and procedures will make the process of reporting go more smoothly, thus helping to reduce the anxiety and reluctance of staff, and protecting the children and youth more effectively. The figure below²² illustrates the values that should guide the creation of a child protection policy.

²² *Ten Steps to Creating Safe Environments for Children and Youth: A Risk Management Road Map to Prevent Violence & Abuse*. Canadian Red Cross.

Values That Guide a Child Protection Policy

- The best interests of the child are primary
- All children, girls and boys, of all abilities and backgrounds have equal rights to safety in all settings and locations.
- Violence and abuse against children are never acceptable in any form, location or setting.
- Children are vulnerable to violence and abuse due to their size, age, physical and psychological maturity, dependence and lack of power. While all children may be vulnerable, in some settings, some children may have a heightened risk of abuse and violence.
- Violence against children has damaging and often long-lasting repercussions for children, their families and their communities.
- All organizations and adults are responsible to provide safety for the children in their care.

The Centers for Disease Control (CDC)²³ also suggests that implementing a child sexual abuse prevention policy and making the changes necessary to protect youth from child sexual abuse in organizations are not easy tasks, but that organizations should take on as many individual strategies to prevent child sexual abuse as they can. They also offer several steps for organizations to take to effectively create, implement and measure their child sexual abuse prevention strategies (See Appendix 7 for more detail).

The Task Force suggests that the attitudes of leadership towards abuse prevention policies can and will have a direct effect on how the policies are viewed by the YSO as a whole – particularly if the policies are being implemented for the first time. Introducing any kind of change in an organization’s way of doing business – particularly one that is trying to effect behavioral change in its managers, staff, volunteers and clients – is more of a *process* than a single event, and that process takes place over time and requires buy-in from the people whom the policy affects (See more on this below in the section on Implementation and Oversight). Strong leadership within the YSO that emphasizes regularly the importance of child abuse prevention can help make some of the challenges more manageable. Leadership must make the case for the policy and then either

²³ Saul J, Audage NC. *Preventing Child Sexual Abuse Within Youth-serving Organizations: Getting Started on Policies and Procedures*. Atlanta (GA): Centers for Disease Control and Prevention, National Center for Injury Prevention and Control; 2007.

lead and coordinate the effort – or delegate it to an individual or a small internal group who will be responsible for its creation and implementation. In the latter case, it is critical that YSO leadership remains involved, visible and engaged on a regular basis to reinforce their commitment to the effort and its goals.

Development and implementation of a policy is best done as a collaborative effort. A policy will be effective only if people are aware of it, feel some sense of ownership towards it, and have the opportunity to express their views on how it will, should, or will not work. Thus, whether creating a set of child safety policies for the first time, or reviewing and updating one that already exists, input from a range of stakeholders is important to consider. Managers, front-line staff, volunteers, parents, children and youth representatives can be invited to participate as an internal “consulting team” and will have a range of experiences to offer. Consultation with local social service agencies, law enforcement, legal counsel, risk managers, faith-based groups, and other YSOs that have already enacted child safety policies can offer professional expertise and experience with policy development and implementation that can help to avoid pitfalls and move the process along more efficiently.

Once the team is formed, YSO leadership and the consulting team can use the sections of this report and the sample policies, mission statements, codes of conduct, procedural guidance and other documents provided to construct a draft document for the group to consider. There is no one size or form that is better than any other. If the “master” document gets large, YSOs can extract and consolidate the most important points into a set of “abbreviated” policies or “pocket version” policies that address specific populations like volunteers and other “front-line” staff who may be less concerned with the legal, managerial and supervisory aspects of the policies than with issues like “What is child abuse?”; “How can I recognize it?”; and “What am I supposed to do, and who am I supposed to tell if I see it?”

Once the policy is drafted, it can be sent around for internal and external review, and the consultant team can be convened to present their opinions, reactions, and suggestions. If there are differing views expressed at the consultations, document how leadership determined what would be included in the policy and why. The document can then be revised and sent to all stakeholders for review and comment. Provide a date for comment and allow enough time for people to provide them. Then review the comments and finalize the policy. Have the policy approved by the organization’s governing body and make it publicly available (e.g. by distributing it, posting it on bulletin boards, putting it online, making copies available, etc.). Implement the policy and set a future review date. Policies should be considered “living” rather than static documents. They should be reviewed (and updated if necessary) every two to three years to see what is working, what isn’t working as expected, and what aspects might need to be

strengthened. Between publication and review, think about the kinds of information and data that should be collected that will help answer these questions (See section on Analysis, Review and Self-Audit below).

An effective set of abuse policies for youth-serving organizations should:

- Clearly establish leadership’s commitment to building and maintaining an environment and culture in which children and youth are safe and their best interests are primary.
- Codify the safety framework of the organization.
- Communicate to all managers, supervisors, employees, and volunteers (and have them acknowledge) their legal and ethical obligations to protect children and youth from harm, abuse and exploitation.
- Clearly identify and detail Massachusetts state laws regarding the reporting of suspected, observed or disclosed cases of child abuse and neglect to the Department of Children and Families (DCF), and provide the state-specific definitions of the types of child abuse and neglect.
 - Include step-by-step instructions with a flow chart including names, telephone numbers, the sequence of events, and the information needed, with a report form attached. Also identify the emergency, after-hours procedures for reporting (See Appendix 11 for Samples).
- Identify who in the YSO is expected/required to report and in what timeframes.
- Describe the organization’s internal reporting protocol and identify the office, person, or designated persons to whom suspicions, observations or disclosures of child abuse should be reported
 - Ensure that parents and children/youth are also aware of the protocol and know whom to contact and how.
- If appropriate, describe the various individuals, teams, organizational departments or functions dedicated to abuse prevention and investigation and define their roles and responsibilities – particularly how they may differ when an allegation of suspected abuse is made against a current or past member (or client) of the organization.
 - Clearly describe the investigation process that takes place when an allegation of child abuse or neglect is made.
- Announce and detail the existence of pre-employment/volunteer screening and background check procedures as mandatory.
- Identify the initial and follow-up training requirements for all stakeholders: those working directly with children/youth; those working indirectly with children/youth;

- managers, supervisors, employees, volunteers, interns, parents and, in some cases, the children/youth themselves.
- Ensure that training includes instruction for a trauma-informed, victim-centered response to all children and youth who disclose incidents of child sexual abuse.
 - Establish the procedures and standards for physical access to, and for the safety and maintenance of the organization's buildings and grounds.
 - Establish Codes of Conduct containing the guidelines and standards for interpersonal behavior, professional boundaries, and on-site and on-line interaction among staff and between staff and children/youth.
 - Outline responsibilities for monitoring behaviors and define the lines of communication and reporting when problematic behaviors are suspected, observed, or disclosed.
 - Identify the tools and ongoing requirements for record-keeping, information security, measurement, self-audit, periodic assessment, and continuous improvement of child safety policies and procedures.
 - Identify plans and requirements for both internal and external communication and partnerships.

Each of these points will be discussed in more detail in the sections below. It is important to remember that a set of child safety policies and procedures sets the standard for each individual and for the YSO as a whole. Whether a YSO is evaluating an existing policy or creating a new one, a convenient *Child Sexual Abuse Prevention (CSA) Evaluation Tool for Organizations*²⁴ is provided below. The complete evaluation tool is provided in the Resources section. Also, see Appendix 7 for a listing of sample and model policies from both small and large YSOs.

²⁴ Wurtele, Sandy K. (2014). *CSA Prevention Evaluation Tool for Organizations: Child Protection Policies and Procedures*. Reproduced with author's permission (<http://www.canconferenceuofm.org/wp-content/uploads/handouts/2015-can-conference-uofm-D-6-Wurtele.pdf>).

CSA Prevention Evaluation Tool for Organizations Child Protection Policies and Procedures	
General Standards	Yes
a. Policy is written in a clear and easily understood way. (Evidence: Copy of policy)	
b. Policy contains definitions of key terms. (e.g., Sexual Abuse; Minor)	
c. Policy is publicized, openly displayed, promoted and distributed to everyone involved with an organization. (Evidence: Circulation list to show distribution)	
d. States Purpose: Agency's commitment to create safe environments for children and protect them from harm. (welfare/safety of youth is paramount; values children, youth)	
e. States Principles underlying standards: (e.g., all children have the right to protection and safety; equal rights to protection from harm; to an environment free from violence, abuse, harassment, and discrimination; treat each other with respect; Everyone has a responsibility to support the care and protection of children)	
f. Abuse-free, non-sexualized work environment. Zero tolerance for any form of abuse of youth, whether emotional, physical, or sexual.	
g. Policy is approved and endorsed by relevant management/oversight body. (Evidence: signed statement of approval; excerpt from minutes of relevant meeting to show approval)	
h. Policy specifies to whom standards apply. (e.g., mandatory for staff and volunteers)	
i. Developed in collaboration with many stakeholders. (e.g., children, parents, law enforcement, legal counsel, experts, child protective services)	
j. Encourages collaboration between parents and program staff to keep children safe.	
k. Policy is reviewed/updated on regular basis. (e.g., every three years or whenever there is a major change in the organization or relevant legislation) (Evidence: Timetable for review)	
l. Processes/mechanisms are in place to consult children and parents as part of the review of safeguarding policies and practices. Steps are taken to seek users' views on policies and procedures and how they are working.	
m. Identifies personnel with clearly defined roles and responsibilities in relation to child protection. Person(s) responsible for implementing/reviewing policy and procedures.	
n. Information about where to go for help and contact details for designated contact person, local social services department, police, and emergency medical help are readily available.	

SECTION 2: Screening and Background Checks for Selecting Employees and Volunteers

Executive Summary

All youth serving organizations want to attract, select and retain employees and volunteers who are safe to be around children, and to screen out those who have the potential to cause them harm. However, it sometimes happens that individuals are screened and hired who present risks to, or have previously abused children, and use the opportunity to abuse again. This can happen for a number of reasons. Because the majority of child sexual abuse cases are not reported to the authorities, not every offender has a criminal record, or has a criminal record that includes

sexual offenses.²⁵ Also in many instances, notably but not exclusively in school settings, suspected offenders have been allowed to resign – sometimes with letters of recommendation – and are not reported to the authorities.^{26,27} Unfortunately, these offenders can later apply to a new school district, be hired with a clean record, and use the opportunity to re-offend. In other cases, offenders do have a criminal history that is not checked as part of a routine screening and hiring process. Smaller organizations and private, single-owner businesses that serve children may not conduct a check of criminal history as part of the hiring process because the perceived risk to children is too low – or they do not have the awareness, knowledge or means to do so. This section outlines a multi-level decision making framework that YSOs can use to protect themselves and the children who come to them for services.

It is reasonable to assume that most YSOs undertake some basic form of screening (application, interview, and reference checks) to ensure that the individuals being considered have the basic skills needed to function in the intended position; possess the maturity, relevant experience and judgement to care for, supervise, or assist in the supervision of the children that will be placed in their care; and pose no threat to the children’s safety and well-being.

Some organizations go much further than a basic level of screening because of statutory mandates, accreditation or licensing requirements (e.g., schools, daycare centers, foster homes); the nature of the services being provided to the children and youth and their perceived vulnerability; or because the position requires (or has the potential for) the employee or volunteer to have unsupervised or unmonitored interactions with minor children. These additional screening steps can include fingerprinting, local and national checks of criminal history and sexual offense records, professional credential checks, as well as checks of driving records if the position requires the transportation of children.

The Task Force acknowledges that there is no “one size fits all” approach to screening and selecting employees and volunteers, and cautions that conducting screening and background checks for criminal history does not in itself provide a 100% guarantee against bringing someone into the organization who will cause harm to children if given the opportunity. Even so, the Task Force suggests that a basic level of screening and background checks for potential employees and volunteers is necessary for all organizations, and should not be omitted. Ideally, screening and background checks should be considered as one part of a comprehensive *process* that has multiple components – each of which provides a piece of

²⁵ Leclerc B. & Cale, J. (2015). Adult sex offenders in youth-oriented institutions: Evidence on sexual victimization experiences of offenders and their offending patterns. Trends & Issues in Crime and Criminal Justice. 497. Available from <http://aic.gov.au/publications/current%20series/tandi/481-500/tandi497.html>

²⁶ K- 12 Education: Selected Cases of Public and Private Schools That Hired or Retained Individuals with Histories of Sexual Misconduct. GAO-11-200. Washington, D.C.: December 8, 2010.

²⁷ Federal Agencies Can Better Support State Efforts to Prevent and Respond to Sexual Abuse by School Personnel. GOA-14-42. Washington, D.C.: January, 2014.

additional information about an individual’s overall suitability to be with children. The section below outlines the components of this process, and present an ideal from which organization can craft minimum required screening standards. The section also presents guidance on when more comprehensive standards should be used.

The key for organizations will be to use the section to help them make decisions about risk, the parts of the overall screening and hiring process they can reasonably access and implement to decrease that risk, and ways to craft appropriate policies for their different circumstances that still reflect best practices.

A screening toolbox (Table 1) is included in the section that outlines the various parts of a comprehensive screening and hiring process.

Table 1
The Screening Toolbox

<ul style="list-style-type: none">• Marketing and recruitment Materials• Written application and Statement of Suitability• Personal Interview• Internet Search - Google, Facebook, Instagram, Twitter• Observation of the applicant• Reference checks• Assessment of home environment (in cases where the organization’s services are partly or wholly provided in the applicant’s home)• National and state criminal history check (can include fingerprinting)• National and state sex offender registry check• Child abuse registry check• Professional credentials and disciplinary records check• Driving records check if the position includes the responsibility to transport children and youth• Check applicants against internal records

Key Findings and Recommendations

- It is important for all YSOs to employ some basic level of screening and background checks for persons applying for employment or volunteer opportunities involving services to children and youth.

- For some YSOs and professions, the type of screening and background checks required for certain potential employees or volunteers is mandated by state and Federal law. For other YSOs the level of screening and background checks is more discretionary.
- To determine the level and type of screening and background checks to conduct in discretionary circumstances, a risk assessment should be conducted that considers such things as the level of employee/volunteer contact with children and youth, the characteristics and ages of the children being served, and the amount and types of supervision available that are available to oversee and monitor that contact (see Table 2 below). As a result of this assessment, supplemental screening measures can be selected to augment basic screening tools.
- The items in Table 1 (above) can be selected and used to create a screening and hiring standard that addresses and lowers the perceived risk to children and to the organization.
- The type of screening and hiring methods being used by an organization should be reflected and clearly explained in the organization's policies and procedures, and marketing and advertising materials.
- Screening, by itself, cannot guarantee 100% safety, but must be combined with the other abuse prevention measures described in this report.
- The existence of a screening and hiring policy can act as a deterrent to those who would seek to join an organization with the intent to sexually abuse children and youth.
- The existence of a screening and hiring policy can serve to increase parents' confidence in the organization and in the safety of their children while in its care.

Recommended Implementation Decision Making Model

STEP 1: Basic Required Screening:

- Written application with signed Statement of Suitability
- Reference checks (2-3) with phone contact
- Comprehensive personal interview
- Consider routine check of publicly available criminal and sexual abuse history

STEP 2: Assessing Risk that Could Trigger Additional Screening Requirements

- Do Massachusetts and Federal laws identify additional requirements?
- What is the nature of the contact between the employee/volunteer and the child(ren)/youth?
- What is the duration and frequency of the contact?
- In what physical locations will the contact take place?
- Is the contact monitored, supervised or unsupervised?
- What are the ages and vulnerabilities of the children and youth being served?

- What other adults will be in the same area?
- What is the potential for the employee/volunteer to be alone with the child(ren)/youth and unseen?

STEP 3: Use Additional Screening Measures as Needed

- Check state and national criminal and child sexual abuse records
 - Ranges from information that is publicly available to comprehensive check of all available state and national (fingerprint-driven) criminal and child sexual abuse records
- Confirm education and professional licensing/certification credentials
- Check professional disciplinary board records
- Check license and motor vehicle (violation) records if position requires transporting children
- Observation, home visit

End of Executive Summary

Goal

To recruit and select skilled, qualified individuals for staff and volunteer positions and to screen out individuals who have sexually abused children and/or youth, may be at risk to abuse, or not be safe individuals.

General Principles

One effective means of preventing child sexual abuse in child and youth serving organizations (YSOs) is to screen out those at risk to cause harm before they are hired or allowed to volunteer. The good news is that most organizations conduct some form of screening. However, these guidelines can help ensure that any organization is doing as much as possible to keep the children and youth in its care safe.

Whether the organization is a large corporation or a small sole proprietorship, whether it has hundreds of employees, or only a few, everyone can implement an effective screening program to protect children. Not all the methods for screening presented here will apply to every program and organization. These are guidelines to help organizations adopt the best possible screening practices for their particular environment and risk. The important goal is that every organization incorporate some level of applicant screening into its program and treat it as integral to the operation as a good curriculum, sound business practice and thoughtful

management. Screening is not discretionary, or an add-on; it is a vital component of any program serving children and youth.

Screening means that all employees, staff, volunteers, and other members of the community whose potential employment or volunteer service involves direct contact with, and/or the potential for unmonitored access to children (including any individuals who regularly provide transportation to children) should be given thorough reference and background checks, including review of criminal and sexual offender records. Screening for child sexual abuse should be purposefully integrated into the standard screening and selection process that organizations use to fill both paid and volunteer positions. All candidates for a particular position should be subject to the same screening process.

Even though this section deals primarily with employees and volunteers, it may also be appropriate to ask vendors and others providing contract services to organizations where minors are present to provide evidence that a background check was completed on any individual sent to provide the services. This may not be necessary if the vendor or contractor is not providing direct services to children and youth, is restricted to the area where the service is being provided, and is either accompanied or in a space where the individual can be observed by other adults. In each case, however, adults in the organization should be advised that vendor/contractor personnel are on the premises, and that children/youth are not to be permitted near the workspace unaccompanied.

Note that while employee and volunteer screening and selection are important, they are not – by themselves – a guarantee of safety, and should therefore be integrated into other measures and efforts described in this report, and adopted to prevent child sexual abuse. Organizations must also continue to maintain their vigilance and ensure that all staff members, employees and volunteers receive adequate training, supervision, and management support to fulfill the organizations' missions. Staff screening can be time consuming, and there may be fees associated with some of the background checks, but the cost of screening can be exceeded greatly by the cost of an organization's failure to screen, and the subsequent harm to its children. A well-designed screening process, in combination with the other practices outlined in this report, is an investment in the future of all youth serving organizations and the safety and well-being of the children and youth they serve.

Preparing to Screen - Developing policies and procedures

In the context of this report, the act of screening does not refer to a single event, but more to a process with multiple components – some of which occur as the potential applicant is being

considered for employment or volunteer service, some that apply after an individual joins the organization, and some that can recur periodically during the individual's employment or tenure with the organization. These individual components will be discussed in more detail below, but it is important from the outset that the screening requirement is captured in an organization's policies and procedures, and is clearly and accurately described. The very existence of a screening policy can actually be a potential deterrent to individuals who seek employment or volunteer service in YSOs with weak (or no) screening practices in order to have access to, and to harm children and youth.

In developing a screening policy, it is recommended that leadership take the following steps in accordance with the role, size and resources of the organization:

- Know the rules and regulations about screening (if they exist) that apply to the professions represented in, and to the work or activity done by the organization²⁸;
- Determine who to screen, and;
- Develop and implement a standard set of policies and practices for screening that includes:
 - Strategies for incorporating screening into recruitment materials;
 - Identification of screening elements and their use;
 - Identification of the individuals responsible for screening and a plan for training them;
 - Development of standard protocols for gathering screening information including timeline and information management practices;
 - Establishment of criteria to evaluate screening results and inform a determination of the applicant's suitability, and;
 - Establishment of a protocol for acting on screening information including who is empowered to make the final decision.

Know the rules.

State and Federal laws and regulations require specific types of screening and background checks – particularly criminal and sexual offense records checks – for individuals and professions engaged in providing certain services to children and youth. Specific types of screening and background checks may also be required as a condition of receiving state or federal funding.

²⁸ Examples include, staff screening requirements from the Department of Elementary and Secondary Education for teachers and staff, the Department for Early Education and Care for licensed child care organizations, and similar screening requirements imposed by the MA DPH for summer camps.

Different organizations have different requirements and may make different decisions about what background checks they are planning to conduct. Some (e.g., public schools) have strict requirements while others are left to the discretion of the organization (e.g. afterschool program in a faith community). These requirements may also limit the circumstances under which an organization may use that information to exclude an individual from consideration. There is no “one size fits all” screening requirement. Therefore, if after review, an organization remains unclear about the rules and requirements that apply to its operation, it is strongly recommended that leadership consult with an attorney and or relevant professional association(s) for advice and guidance.

All organizations conducting criminal history and background checks should also keep in mind that, unless provided otherwise by law, the existence of a criminal record does not necessarily automatically disqualify an applicant (more information on this below).

Who should be screened?

In addition to meeting screening requirements for specific positions, YSOs should implement some level of screening and background check for all employees and volunteers – both youth and adults (although information for youth will likely be limited). No exception to screening should be made, even for individuals known to the screener or to the organization. However, the level of screening may change depending upon the level of engagement with children and youth and especially if unsupervised interactions are expected. Organizations should consider stronger requirements for screening of individuals who are likely to have any direct unsupervised or unmonitored contact with children and youth.

Thinking about risk

To determine what screening tools are most appropriate to use for a particular position and to ensure consistency in use of screening protocols, it is recommended that YSOs conduct a strengths and risk inventory of paid and volunteer positions to include:

- Assessment of the likelihood for unsupervised contact with children and youth (both routine and incidental);
- Level of supervision the staff members or volunteers are subject to;
- The kinds of interactions the staff members or volunteers are expected to have with the children/youth in their care;
- Identification of factors such as the likelihood of interaction with children and youth of a certain age, or with those who have other conditions or characteristics which may

make them more vulnerable (e.g., are preverbal, have limited communication skills or mobility, or have had adverse experiences that impact their ability to report abuse or to do so accurately and with credibility) and;

- Level of decision making or autonomy within the position

In summary, whether a YSO is large enough to have a risk management or human resources office that can conduct a formal assessment, or is a small business with a single proprietor, this risk inventory translates into some basic questions that can help determine the level of screening for potential employees and volunteers:

Table 2
Thinking About Risk

- | |
|--|
| <ul style="list-style-type: none">• What is the nature of the contact between the employee/volunteer and the child(ren)/youth?• What is the duration and frequency of the contact?• In what physical locations will the contact take place?• Is the contact monitored, supervised or unsupervised?• What are the ages and vulnerabilities of the children being served?• What other adults will be in the same area?• What is the potential for the employee/volunteer to be alone with the child(ren)/youth and unseen? |
|--|

Based on this assessment, positions should be assigned a risk designation:

- High: Expected unsupervised/unmonitored interaction with children
- Moderate: Potential unsupervised/unmonitored interaction with children
- Low: Exclusively supervised/monitored interaction, or no potential contact with children

These designations should correlate to the organization's requirement for specific screening protocols and should be indicated in the job description for the position. Best practice would advise that the higher the risk to children, the more in-depth the screening protocol for the position should be.

The structure above would pertain to larger organizations with sufficient numbers of employees and volunteers serving in different functions, and with different levels of interaction with children and youth to warrant a screening protocol with multiple levels. It is not uncommon for

organizations like this to pay for the services of a commercial vendor to conduct these types of multi-level background checks – from standard Massachusetts criminal records checks (CORI/SORI, as defined below) all the way to national, multi-state (especially those states in which the applicant has worked or volunteered previously), international, and Interpol criminal and sexual offense records searches.

For smaller YSOs and businesses with few employees or volunteers, where a manager or supervisor assumes the responsibility to screen and hire applicants, and the risk is determined to be equivalent or level across positions in the organization, the policy could be to treat all applicants equally, and establish a standard screening protocol that applies to applicants for all positions interacting with children and youth.

The Screening Toolbox

As mentioned above, criminal and sexual offense records checks are only part of the process of screening out individuals with the potential to harm children and youth. There are many other elements that can, and should be used to assess the appropriateness and “fit” of an individual into the organization, its tasks and its culture. Depending on the position being sought, the size of the organization, and the risks assessed as described above, a comprehensive screening process includes all, most, or as many of the elements below as are appropriate:

- Marketing and recruitment Materials
- Written application and Statement of Suitability
- Personal Interview
- Internet Search - Google, Facebook, Instagram, Twitter
- Observation of the applicant
- Reference checks
- Assessment of home environment (in cases where the organization’s services are partly or wholly provided in the applicant’s home)
- National and state criminal history check²⁹
- National and state sex offender registry check
- Child abuse registry check
- Professional credentials and disciplinary records check
- Driving records check if the position includes the responsibility to transport children

²⁹ Massachusetts requires organizations like public, private and parochial schools to CORI employees at least once every 3 years. Some do it annually. See: <http://www.mass.gov/edu/birth-grade-12/early-education-and-care/laws-regulations-and-policies/background-records-check-regulations-and-policies/frequently-asked-questions-regarding-background-checks.html>

- and youth
- Checking applicants against internal records

While the Task Force encourages all YSOs to utilize as much of the above in their screening process as possible and appropriate, it is especially important for positions with the potential for unsupervised contact with children and youth that state and national criminal history, sexual offense and driving records (if done) are checked not only upon candidacy but, if hired, periodically thereafter. The process for utilizing the tools above in the capacity either required of, or as determined by the organization, should be written into the organization's policies and procedures. A more detailed explanation of the elements in the screening toolbox follows.

Marketing and Recruitment Materials

Finding and retaining a qualified and diverse workforce is one of the greatest challenges for child and youth serving organizations. Competition for support and staffing may make some concerned about scaring people off with early discussions about background checks and screening. However, balancing marketing with safety is easier than it sounds. In fact, in addition to acting as a deterrent to applications from individuals who may pose a risk, clear statements about the organization's commitment to keeping children safe may be very appealing to the types of individuals the organization is hoping to attract, and provide the organization with a strategic advantage over other YSOs that are not undertaking the same level of protection for the children and youth in their care.

The existence of policies, procedures and tools focused on child safety can also be attractive to employees and volunteers because these structures serve to protect them as well. Materials and statements on an organization's website, job and volunteer postings and advertising that demonstrate an awareness of child safety issues, express a commitment that they are taken seriously, and describe the steps the organization takes to keep children from being harmed, will also be attractive to parents who are the primary decision makers about the organizations they seek out for services or activities for their children. See Sample³⁰ below:

³⁰ Prevent Child Abuse New Jersey - <http://www.cpe.rutgers.edu/njdcf2013/docs/010-Preventing-Child-Sexual-Abuse.pdf>

“This organization is committed to the safety and wellbeing of all children and youth accessing our services. We have taken steps to educate our staff about the risks related to child sexual abuse, instituted policies and practices to protect children from the risk of child sexual abuse and trained our staff and volunteers about proper reporting requirements.”

Recruitment and marketing materials should:

- Clearly state the organization’s commitment to child sexual abuse prevention;
- Inform applicants about background check requirements and what the “deal breakers” are, and;
- Share the organization’s Mission Statement/Code of Ethics and Code of Conduct (see Code of Conduct section below).

Written Job/Volunteer Application and Statement of Suitability

The written application provides the information needed to assess the background and interests of applicants. Questions should help determine whether applicants have mature, adult relationships, as well as clear boundaries and ethical standards for their conduct with children and youth. The sidebar in Appendix 8, may help organizations to develop appropriate questions.

The written application should include a statement of interest or cover letter in which applicants are asked to describe their interest in the organization and the position for which they are applying. Organizations may consider requiring a more in depth statement of interest from individuals, particularly youth, for who work history is minimal and/or criminal history is unavailable. Additional suggestions for the items on a written application, and a sample Statement of Suitability can be found in Appendix 8.

Personal Interview

The personal interview provides an opportunity to meet applicants and determine if they are a good fit for the organization. It is also a time during which the interviewer can ask questions to screen for child sexual abuse risk factors. As with all other parts of the screening - to avoid actual or perceived discrimination - it is important that all applicants to the organization, or for specific positions, be asked the same (or substantially similar) set of questions and that, to the extent possible, answers are evaluated based on particular criteria. Whenever possible,

interviews, particularly for larger organizations, should be conducted by individuals trained in interview techniques (See Appendix 8 for sample questions).

The personal interview is also a good time to provide applicants with the organization's Code of Conduct, and to either discuss or present a copy of the Policies and Procedures – or the portions of the Policies and Procedures that pertain to child safety.

Internet/ Social Media Search

Because the internet and social media are a rich source of information about prospective candidates, and social media is perceived as a forum in which individuals are likely to reveal a more complex picture of themselves, some organizations are including a search of these sources as part of a background check. Bearing in mind that employers are obligated to disclose all information used in making a decision not to hire, YSOs considering using this type of check should carefully assess the benefits and risks of acquiring this information.

Among the potential benefits is the possibility of discovering information regarding inappropriate behaviors that would not fit with company codes of conduct, including sexualized postings to or about minors, other forms of violence, and/or drug or alcohol abuse.

Potential Risks include:

- Finding information that cannot be used in the interviewing and hiring process³¹, such as:
 - Religious affiliations
 - Race
 - Disability status
 - Age
 - Sexual orientation
 - Gender
 - Gender identity
- Attribution of information about another person with the same or similar name to the candidate.
- Inability to verify the source or accuracy of information posted about the candidate.

³¹ These items are protected from discrimination under Title VII of the Civil Rights Act of 1964, the Americans with Disabilities Act (ADA) of 1990, the Age Discrimination in Employment Act (ADEA) of 1964 and other local laws. A candidate cannot be disqualified from a job based on this information alone, and when it is present, can make use of any other information legally challenging. For more information, see the USEEOC website: <https://www.eeoc.gov/laws/statutes/>

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. Phone conversations with two or three previous employers 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, or any reference from a former employer in a child related field? Is there a reason (i.e., applicants may not want the present employer to know they are looking)? To provide a more complete picture of the applicant, 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, it could be a red flag. Clarify whether the person providing the reference is limiting information because of company policy (See Appendix 8 for sample questions).

Observation of the Applicant

When possible, it can be informative to observe the applicant in the environment with the child(ren) and youth to look for potential red flags. If this is done pre-hire, and before the background checks are complete, make sure the individual is supervised and monitored at all times by current (cleared) staff. If there are behaviors, actions, or statements that are concerning, do not ignore them. This does not necessarily mean there is a problem, but it may be a potential issue that needs further observation or inquiry. For certain positions such as respite providers, tutoring, or mentoring programs where children and youth meet with staff in their homes, it will be especially important to immediately discuss concerns, reiterate the child safety policies of the organization, and be clear that the Code of Conduct – especially as it pertains to children and youth – is taken seriously and is strictly enforced.

Assessment of Home Environment

The need for assessing an applicant's home environment depends on the mission of the 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 overnight camps or after-school programs.

Massachusetts Criminal Background Checks

Criminal background checks are an important tool in screening and selection. YSOs should ensure that they are aware of any federal, state or organizational requirements for background checks that pertain to them. Again, be aware that these checks do not, by themselves, guarantee that sexual offenders will be identified, and can present significant limitations. Not all sex offenders have criminal records and, if they do, their criminal history may not include sexual offenses.

In Massachusetts, the acronym “CORI” stands for “Criminal Offender Record Information.” The term CORI is commonly used to refer to the specific criminal history information that employers, landlords, schools and others can obtain directly from the Commonwealth – most recently via an online system called iCORI. Adult court records are public information unless sealed by court order. There are various ways that individuals and organizations can access CORI information. These include registering the organization with the online iCORI service, conducting an online search, and submitting a request form directly to the Massachusetts Department of Criminal Justice and Information Services (DCJIS). A copy of the CORI Request Form, and a CORI Acknowledgement Form (to be signed by the applicant) can be found in Appendix 8. There is also a level of CORI access available to the public called an “Open” CORI. Additional details about access to Massachusetts criminal records, the CORI and iCORI process, organizational requirements, and the types of information CORI can provide can be found on the DCJIS website³² and the Massachusetts Court System.³³

Similarly, the acronym “SORI” stands for “Sex Offender Registry Information”, and pertains to information about convicted and/or adjudicated sex offenders residing, working or attending school in the Commonwealth. In Massachusetts, sex offenders are classified by the Sex Offender Registry Board (SORB) as to their risk to reoffend sexually and the degree of danger they pose to the public. A Level 1 designation means the offender has been deemed a low risk, Level 2 is an offender deemed a moderate risk, and Level 3 is designated as a high risk to re-offend. The Massachusetts Sex Offender Registry Law allows for the release of information on sex offenders categorized at Level 2 and Level 3.

³² <http://www.mass.gov/eopss/agencies/dcjis/>

³³ <http://www.mass.gov/courts/case-legal-res/law-lib/laws-by-subj/about/cori.html>

While all Level 3 sex offender information is available on the SORB's website (www.mass.gov/sorb), the website only lists Level 2 sex offenders classified after July 12, 2013. Organizations and the public can make SORI requests both from local police departments (all Level 2 and Level 3 sex offender information is available upon request) and the SORB. A copy of the SORI Request Form can be found in Appendix 8. Agencies and organizations can also register with the SORB to utilize its online search process call "eSORI" for employment and volunteer screening purposes. More information about sex offenders and the SORI/eSORI process can be found on the websites of the SORB and the Department of Public Safety.^{34,35}

National Criminal and Sexual Offense Background Checks

National criminal record and fingerprint-based registries also exist that must be queried by certain organizations like the public schools and licensed child care programs, to assess the suitability of individuals who will have direct and unmonitored access to their children and youth. The websites mentioned above also contain information about this process.

Briefly, the nationwide fingerprint check is a search of the FBI's master fingerprint file, which can be accessed through state law enforcement agencies. The check involves searching the official state repositories of criminal-history information. These state repositories are maintained in a database called the Integrated Automated Fingerprint Identification System (IAFIS). IAFIS is a national fingerprint and criminal history system that responds to requests 24 hours a day, 365 days a year. IAFIS searches include arrest records, convictions, juvenile records (if provided by the state), dismissed charges or not-guilty verdicts, warrants, Sex Offender Registry information, physical characteristics (i.e., height, weight, hair, tattoos, and eye color), and aliases. All arrest data included in an Identification Record is obtained from fingerprint submissions, disposition reports, and other information submitted by agencies with criminal justice responsibilities. See Appendix 8 for more information about fingerprint-based searches.

National Sex-Offender Public Website (NSOPW)

Another national criminal identification resource is the Dru Sjodin National Sex Offender Public Website (NSOPW). Federal law created the NSOPW which links public, state, territorial, and tribal sex offender registries from one national site. The www.NSOPW.gov portal allows the public to conduct nationwide searches free of charge. Utilizing this website as a screening tool may help identify sex offenders who attempt to avoid detection by moving

³⁴ <http://www.mass.gov/sorb/>

³⁵ <http://www.mass.gov/eopss/crime-prev-personal-sfty/sex-offenders/obtaining-information-about-sex-offenders.html>

from state to state and/or may live in one state, but apply for employment in a bordering state. In Massachusetts, YSOs can also access the NSOPW website through the SORB website: <http://www.mass.gov/eopss/agencies/sorb/>. It is important to search both the national and state websites.

Although sex offenders are required to provide a large amount of personal data, the Massachusetts SORI records and NSOPW registries provide limited information, including:

- Personal information, such as name and any aliases, age, physical description, and current photos;
- Home address, work address, and employment status, and;
- Convictions, jurisdiction of convictions, dates of convictions, relevant state statute, and age of victim(s) if known

NOTE: Not all sex offenders are on the NSOPW. State laws dictate which offenders are made public. For example, it is possible that an offender will come up on a fingerprint check, but will *not* be listed on the public website due to the requirements of the state. Links to all state, territorial, and tribal sex-offender websites can be found by visiting the “Registry Sites” web page, accessible from www.NSOPW.gov. If you have questions about the NSOPW, contact the SORB or the U.S. Department of Justice Office of Sex Offender Sentencing, Monitoring, Apprehending, Registering, and Tracking (SMART) at www.ojp.usdoj.gov/smart/.

Many employers, privately owned businesses, studios and clubs that provide services to children and youth do not fall under the Massachusetts or Federal laws and accreditation regulations that mandate CORI, SORI and fingerprint inquiries, but can nonetheless – following certain procedural requirements – access the publicly available aspects of all the databases above as part of their screening process. As of May 4, 2012, any employer in the Commonwealth may register for an iCORI account to screen current and prospective employees including full-time, part-time, contract, internship employees and volunteers. Even if organizations are not required to do so, registering does not take a lot of time, and it may be in a YSO’s best interests to gather this information as part of exercising due diligence in assessing the risks presented by individuals who would have access to the children they serve.

Remember, the existence of a criminal record does not necessarily automatically disqualify a candidate from employment or volunteer service with children and youth. Although certain offenses are considered grounds for automatic disqualification, most are not. In situations that allow for some discretion, the individual reviewing the results of criminal history information can also consider and weigh several additional factors on a case-by-case basis. These factors include:

- The relevance of the criminal offense to the nature of the employment or volunteer service being sought;
- The nature of the work to be performed;
- The seriousness and specific circumstances of the offense;
- The age of the candidate at the time of the offense;
- The number of offenses;
- The length of time since the offense occurred;
- Whether the applicant has pending charges; and
- Any relevant evidence of rehabilitation or lack thereof

More information about the options available, and disqualification criteria can be found in Appendix 8 below under “What if a Criminal Record is Discovered?”

For criminal background checks, consider the following:

- Save time and resources by delaying criminal background checks until the end of the screening and selection process. For some organizations this may be required by state law or regulation. 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. Ensure all names and date of birth are correct. Any incorrect information may result in missing criminal background information. (see form in Appendix 8 below);
- Determine the type and level of check required for each applicant. Records are not always linked or comprehensive, so a thorough search may be needed to address concerns about an applicant (i.e., 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 work with children and/or youth, 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 to authorized personnel only, and;
- Ensure that the organization’s process for conducting criminal background checks is legally sound. Consult county, state, and national laws and regulations, as well as the

organization's attorney and insurance company, as needed.

Checks on Professional Credentials, Disciplinary Records and Driving History

For positions that specify an educational requirement, YSOs should verify any credentials listed on the employment application by receipt and review of an official transcript or by contacting the colleges or universities listed.

For positions that require professional certification or licensure, YSOs should obtain from the applicant a copy of the current license or registration, or verify with the accrediting or licensing authority that the applicant is accredited or licensed, and that the accreditation or licensure is current. The same accrediting or licensing authority can be asked about any past or present disciplinary actions involving the applicant.

Applicants for employment or volunteer service who will be driving children and youth as part of their duties should provide the YSO with a copy of a current, valid driver's license, should verify annually that their driver's license has not been revoked or suspended, and should report any suspension or revocation immediately. A Massachusetts employer conducting a pre-employment screening or employee background check can also obtain a copy of the applicant's driving record directly from the Massachusetts Department of Motor Vehicles online or by mail.³⁶

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.

Using the Screening Toolbox – Guidance for Decision Making

The Task Force recommends that all applicants who are seeking positions of trust, either as employees or volunteers, in a YSO that serves children and youth in any capacity should be screened at a basic level. As described above, basic screening includes a comprehensive application form with a signed statement of suitability, a thorough personal interview that examines the applicant's past employment or volunteer experience and explores indicators of

³⁶ See: <https://www.dmv.org/ma-massachusetts/driving-records.php>

potential problem behavior (with possible observation of the applicant's interaction with children and youth) and multiple reference checks – both written and verbal – with past employers or organizations in which the applicant has volunteered.

Further, YSOs should include a description of this process in their policies and procedures, on their websites and in any marketing, recruitment and advertising activity, along with a statement about the organization's commitment to maintaining a safe environment for all children and youth in their care. The material should point out that, without exception, all applicants for positions of trust with children undergo levels of screening and background checks appropriate to their levels of responsibility and that these checks are repeated periodically in accordance with best practices. Existence of this commitment will enhance the possibility of attracting the types of individuals the YSO is hoping to attract, raise awareness of the issue of child safety, give parents greater confidence that their children will be safe, and act as a potential deterrent to applicants who may be looking for organizations with weak screening policies in order to gain access to children.

To strengthen the screening and hiring process further, use the questions in Table 2 (Thinking About Risk) to make decisions about what additional background screening practices to utilize. Whether done formally by offices within a large YSO, or with pencil and paper by a small business owner, the questions are designed to assist a careful examination of the types of risk individuals in positions of trust with children may pose – focusing on opportunities for harm. The questions help to think about the physical setting; the ages and vulnerabilities of the children/youth; the applicant's potential contact with the child/youth; the nature, duration and frequency of that contact; and the level of supervision and monitoring of that contact. Based on the results of this analysis further screening may need to take place.

The rule of thumb is that the greater the potential for an individual to have one-on-one contact with children or youth that is unmonitored or unsupervised, the greater the need to supplement the basic screening. As circumstances require, additional screening can be provided by any or all of the additional items in the Screening Toolbox. The Task Force recognizes that this may present some challenges to smaller organizations, but recommends that when the risk is higher, the more information one has about an applicant, the better. Supplementing the basic screening with a search of even the publicly available criminal and sexual offense history as described above can provide a more complete history of the individuals being considered and thus make the environment potentially safer for the children and youth being served.

Interviewers may wish to make the applicant (and parents) aware that their organization is especially mindful of concerns regarding child-sexual abuse within youth-serving organizations and that it is proactive in taking appropriate measures to protect children. Organizational policy

should also make it clear that criminal and sexual offense records check will be accomplished periodically after hire. Sometimes making the applicant aware of this process will serve as a deterrent to individuals with questionable motives.

Recommended Implementation and Decision Making Model

STEP 1: Basic Required Screening:

- Written application with signed Statement of Suitability
- Reference checks (2-3) with phone contact
- Comprehensive personal interview
- Routine check of publicly available criminal and sexual abuse history

STEP 2: Assessing Risk that Could Trigger Additional Screening Requirements

- Do Massachusetts and Federal laws identify additional requirements?
- What is the nature of the contact between the employee/volunteer and the child(ren)/youth?
- What is the duration and frequency of the contact?
- In what physical locations will the contact take place?
- Is the contact monitored, supervised or unsupervised?
- What are the ages and vulnerabilities of the children and youth being served?
- What other adults will be in the same area?
- What is the potential for the employee/volunteer to be alone with the child(ren)/youth and unseen?

STEP 3: Use Additional Screening Measures as Needed

- Check state and national criminal and child sexual abuse records
 - Ranges from information that is publicly available to comprehensive check of all available state and national (fingerprint-driven) criminal and child sexual abuse records
- Confirm education and professional licensing/certification credentials
- Check professional disciplinary board records
- Check license and motor vehicle (violation) records if position requires transporting children
- Observation, home visit

SECTION 3: Code of Conduct and Monitoring

Executive Summary

A Code of Conduct is another prevention tool that helps YSOs clearly identify acceptable and expected behaviors of anyone in a position of responsibility for the children and youth in their care – from junior employees and volunteers to senior management. Among common items addressed in such codes are boundaries of physical, sexual and verbal behavior; staff-to-child ratios; guidance about being alone with children/youth; awareness of power differentials and abuse of power; bullying, harassment, and discrimination; interpersonal communication with children using electronic and social media; and compliance with the policies and procedures of the organization and the state’s child abuse reporting laws.

Codes of Conduct can be used to address interactions between the staff and children/youth; among the staff members; between staff members and parents; and – in simplified form – among the children and youth themselves. On this last point, for example, a simple set of “rules and regulations” for participant behavior can list the expected behaviors for children and youth, emphasize that the rules are there to keep everyone safe, and identify to whom the children/youth should report if the rules aren’t being followed.

Codes of Conduct should be written in clear language and define behaviors that the organization considers appropriate, inappropriate, or harmful. Depending on the kinds of services the YSO provides, a Code of Conduct should anticipate and contain guidance for interactions that are typical and can be expected – from 1-on-1 contact to small and large group situations – both in and outside the YSO’s facilities – and their duration (e.g., 1-hour small group instruction, all day events, overnight trips, multi-week residential camps, etc.). If a YSO is constructing a Code of Conduct for the first time, input from front-line staff (those in regular contact with children/youth), parents, and the children/youth themselves may prove helpful and contribute to a sense of shared awareness and responsibility.

Since a Code of Conduct cannot possibly contain descriptions of all the situations and interactions that might be encountered, it is helpful for it to incorporate, or be prefaced by, a Mission Statement (the purpose of the organization) and a set of ethical practices (Code of Ethics) that reflect the core standards and principles upon which the organization is built and which guide its activities. In combination, organizational Mission Statements and Codes of Ethics can be used as guidance by staff and volunteers in making decisions when circumstances are uncommon, unclear or unexpected. The section also provides examples of each, and expanded guidance for their construction in Appendix 9.

As mentioned in the previous section, the Task Force recommends that a YSO's Code of Conduct should be integrated into the screening and hiring process for all prospective administrators, staff and volunteers. It should be given to the applicants, read and discussed as part of the personal interview, and signed to acknowledge both its receipt and the applicant's agreement to comply with its requirements – with a copy retained in the applicant's personnel file if he or she is hired. A sample Code of Conduct and a Statement of Receipt and Agreement with signature block are provided in Appendix 9.

A Code of Conduct should also include a clear description of the organization's reporting lines, and the process that follows when behavioral concerns or breaches of the Code are observed and/or reported. YSOs should take care to define, and help staff and volunteers understand the expectation that all inappropriate behavior must be reported according to internal policies including those that could possibly be handled internally by a supervisor or manager, and behaviors that "cross the line" into causing harm and which must be reported to police or DCF. In either case, administrators and supervisors must then ensure that once reported, all allegations are addressed in line with the organization's protocol and Massachusetts law. Staff and volunteers must trust that their reports will be responded to, and will be handled quickly and appropriately. They must also trust that they will not be penalized for coming forward and raising issues, questions or concerns. Negative consequences to a person who reports a concern will prevent others from coming forward – thus increasing the potential risk to children. Monitoring and documentation strategies for those in leadership positions are also included.

Table 3 presents the basic elements of a Code of Conduct. Smaller organizations with clear, uncomplicated reporting lines or few staff may not require all elements. For example, small YSOs could collapse a simplified Code into a set of "Rules and Regulations" that pertain to staff, volunteers, parents, and youth (see example in Appendix 9).

Table 3
Basic Elements of a Code of Conduct

- Mission Statement
- Ethical Principles and Standards
- Guidance on, and definitions of specific behaviors/interactions common and relevant to the YSO
 - Appropriate, inappropriate, harmful
 - Encouraged vs. prohibited behaviors and interactions
- Reporting obligations, procedures and process
- Investigation and monitoring procedures
- Statement of Receipt and Agreement
- Signature Block

When safety policies and a Code of Conduct are reinforced through staff meetings, and other training or professional development opportunities, it ensures that the topic is addressed on a regular basis, and makes it easier for staff to talk about their concerns and highlight the day-to-day behaviors that may be giving them some concern. In this way, a Code of Conduct becomes not only a guide for supervisors, employees and volunteers to follow in terms of their daily interactions, but also a tool that fosters awareness and conversations about behaviors – both those that are appropriate and beneficial, and those that fall outside of the defined boundaries. Implemented thoroughly and consistently, a Code of Conduct serves as an “early warning system” that can detect inappropriate or harmful behaviors as they occur and allow supervisors, managers and staff to address them before they become chronic, and before children and youth are harmed.

Integrating the Code of Conduct into the YSO’s performance appraisal process also reinforces the Code of Conduct as a shared responsibility that serves to protect everyone in the organization and thus promotes a sense of both personal and professional ownership. This, in turn, can help to create an organizational culture that promotes mutual respect, empathy, reciprocity, and dignity, and that encourages people to come forward and helps them to feel safe in doing so.

Key Findings and Recommendations

- A Code of Conduct for all YSOs is another essential tool that helps to prevent child sexual abuse by defining expected/required behaviors and interactions among staff, volunteers and children/youth.
- The elements of a Code of Conduct are listed along with the definitions of appropriate, inappropriate and harmful behaviors. Where they exist, compliance with professional licensing, certification, legislative, or regulatory requirements concerning behavior or interactions should be addressed and integrated.³⁷
- The development of organizational Mission Statements and Codes of Ethics (if appropriate) can help to support judgement and decision making in uncommon or unexpected situations not specifically covered by the Code.
- Implementation strategies for YSOs include integrating the Code of Conduct into the screening and hiring process; requiring staff and volunteer signature on a Statement of Receipt and Agreement; ensuring that the Code is included/addressed in ongoing training and professional development opportunities; and is linked to the performance appraisal process.

³⁷ For example, if a YSO employs licensed clinical social workers, and is drafting a Code of Conduct, it may want to incorporate standards already adopted by the Code of Ethics of the National Association of Social Workers: <http://www.socialworkers.org/pubs/code/default.asp>

- A Code of Conduct must include a clear description of the lines of communication and the process and timeline for reporting concerns, suspicions or allegations about behaviors contrary to the Code – and what will follow. It should also include a description of the penalties for failing to report. The procedures that will be used to respond to the reported situation must be applied in a timely manner, and applied fairly and transparently to ensure their credibility.
- A Code of Conduct should include language about the procedures that are in place for monitoring/recording behavior, encourage the shared responsibility to speak up, and help build an organizational culture that enhances safety and reduces risk.
- The “tone at the top” and the behavior of those in leadership roles is critical for a Code of Conduct to be effective, provides an example throughout the organization, and supports a sense of shared ownership.

Recommended Implementation and Decision Making Model

STEP 1: Developing the Code of Conduct

- Use the model Codes provided in Appendix 9 to lay out the basic elements of a Code of Conduct and signature page. Consider a simpler Code for children/youth.
- If a YSO is affiliated with a parent or national organization, check to see if they have published suggested Codes of Conduct as models.
- If they exist, compliance with professional licensing, certification, legislative, or regulatory requirements for YSOs concerning staff behavior or interactions may be required. If so, ensure they are addressed and integrated.
- In developing the Code, solicit input from supervisors, staff, volunteers, parents, children and youth in terms of the day-to-day behaviors that are important to them.
- Evaluate the different levels of risk presented by the YSO’s range of activities.
- Provide clear guidance on maintaining appropriate boundaries and list the verbal and physical behaviors that are acceptable, appropriate and expected, as well as those that are prohibited, inappropriate or harmful.
 - Include prohibition of pornography, sexual innuendo in jokes or conversation, sexual/intimate contact, and discussion of physical/sexual attributes.
 - Include the requirement to follow the child abuse reporting laws of the Commonwealth and the consequences for failing to report. (Also see section on Responding and Reporting)
 - Include language about the protections in place for people who come forward to discuss or report violations of the Code
- Use the guidance provided to draft a Mission Statement/Code of Ethics to help guide

decision making in situations not specifically described in the Code.

- If appropriate, address issues of staff to children/youth ratios, 1-on-1 interactions with children/youth, transportation in personal vehicles, gift-giving, electronic and social media contact with youth (Also see Safe Environment and Safe Technology section below), out-of-program contact between staff and children/youth, and drug and alcohol use when supervising children/youth.
- If appropriate, include guidance on high risk situations (changing, bathroom activities, overnight stays, etc.).
- Include the consequences for breaching the Code on the signature page.
- Smaller YSOs, depending on their size, staff, and range of activities can create an abbreviated Code that addresses “Rules and Regulations” for behavior that pertain to staff, volunteers, parents, and youth (see example in Appendix 9).

STEP 2: Implementing the Code of Conduct

- Ensure that the Code provides a description of who is responsible for implementing the Code and to whom concerns or reports should be addressed.
- Distribute the Code to all constituents, including parents and other caregivers with a statement about the YSO’s commitment to maintaining a safe environment for the children and youth in its care.
- Integrate reading and signing the Code into the screening and hiring process for new employees and volunteers.
- All current staff and volunteers should be trained on the Code and sign the Statement of Receipt and Agreement. Include a copy of the statement in their personnel file.
- Integrate the Code into the performance appraisal process.
- Include the Code of Conduct in the YSO’s Policies and Procedures, on the YSO’s website and in any marketing, recruitment and advertising activity.
- Reinforce the Code of Conduct at staff meetings, during group and individual supervision, and other professional development opportunities.
- Ensure that once reported, all allegations are addressed in line with the organization’s protocol.

STEP 3: Monitoring and Documenting the Code of Conduct

- Leadership presence in the workplace with an active role in observing and monitoring interactions among staff and between staff and children/youth is essential.
- Develop a monitoring plan that will help determine if and how the Code of Conduct is being implemented.
 - Use the opportunity for positive reinforcement or constructive critique

- Help build a culture of awareness, keeping eyes open, mutual responsibility and dialogue
- Collect data on the types and frequency of reports, allegations and complaints to help identify areas that need to be addressed, or lack of clarity in the Code.
- Share the data with staff and volunteers, ask for feedback and use the data to periodically evaluate, revise and update the Code

End of Executive Summary

Goal:

To ensure that all individuals involved with child and youth serving organizations have clear guidance on both appropriate and inappropriate interactions with children and youth.

General Principles:

The public and private conduct of administrators, staff, employees and volunteers acting on behalf of any youth serving organization can inspire and motivate those with whom they interact, or can cause great harm if inappropriate. An additional tool to help ensure child and youth safety, and to prevent child sexual abuse is a Code of Conduct. The purpose of a Code of Conduct is to identify the expected and acceptable behaviors and interactions between the YSO’s adults (and, in some cases, older teen volunteers or aides) and the children and youth who come to the organization for the services and activities it provides.

Codes of Conduct can be used to address interactions between the staff and children/youth; among the staff members; between staff members and parents; and – in simplified form – among the children and youth themselves. Codes of Conduct can also speak to issues of risk, physical, emotional and sexual boundaries, staff-to-child ratios, 1-on-1 contact with children and youth, sensitivity to the appearance of impropriety, interpersonal communication using electronic and social media, and compliance with the policies and procedures of the organization and the child abuse reporting laws of the Commonwealth.

In addition to guidance on behaviors, Codes of Conduct should also include a clear description of the lines of communication and reporting procedures should a staff member or volunteer wish to discuss and/or report behavior that they are concerned about or that is clearly contrary to the Code, and a description of the actions that will follow in terms of investigation and resolution.

Codes of Conduct should also stress that there will be no adverse consequences for staff who come forward to report. Building a corporate “culture” that supports and encourages open

communication about behaviors involving children and youth is one of the most effective ways to ensure that staff will not be afraid to come forward. Training and education for staff and volunteers about the Code and its purpose can reinforce that it exists to protect them as well as the children/youth, and provides the skills and information that will help them distinguish and talk about behaviors that are inappropriate (and could be corrected internally) and behaviors that are harmful and should be reported to DCF or law enforcement (More on these issues below, and also see section on Reporting and Responding).

When all staff and volunteers see the Code as protective of all members of the organization, and comply with the guidance it contains, it is easier to identify and stop individuals who are not complying - and are exhibiting behaviors that may be intended to harm children (see section on Grooming above). In this way, the Code functions as an “early warning system” that can *prevent* abuse before it occurs.

YSOs should draw attention to the existence (and include a copy) of the Code of Conduct in their policies and procedures, on their websites and in any marketing, recruitment and advertising activity, along with a statement about the YSO’s commitment to maintaining a safe environment for all children and youth in their care. Providing copies to parents and other caregivers also demonstrates the commitment to monitor the behavior of all individuals who come into contact with their children as part of the organization’s safety protocol.

To support implementation, the Task Force strongly suggests that Codes of Conduct should be integrated into the screening and hiring process of the organization (see Section above), and included in the performance appraisal process. Copies of the Code should be distributed to all personnel, and accompanied by their signature on a statement that indicates agreement with its contents and a pledge to abide by its requirements. Strategies for monitoring behaviors and providing feedback to the organization should also be drafted. Implementation strategies and the implications of these requirements for smaller organizations are also addressed below.

Since Codes of Conduct, in large part, contain guidance on the specific behaviors and interactions that are anticipated by the nature of the YSO’s activities and services, they usually take the form of a list of “do” and “don’t” actions around behaviors that are most common. This has several implications.

First, Codes of Conduct should be considered “living” dynamic documents and should be evaluated and revised periodically. This ensures that existing parts of the Code that are not working, or not working as anticipated are revised accordingly, and that missing or unanticipated behaviors and circumstances are added. In both cases, the revisions and modifications are

informed by the experiences of the staff and volunteers who are responsible for implementing the Code and its requirements. This helps with staff “buy-in” and a sense of ownership.

Second, since Codes of Conduct, at any point, cannot contain all possible behaviors and circumstances that staff and volunteers may experience, it will be important to provide additional guidance that can help to support decision making in a wide range of situations. This can be accomplished through the development of Mission Statements and/or Codes of Ethics.

Many YSOs, whether large or small, are familiar with the concept of a “Mission Statement” – a short, foundational statement designed to capture the reasons why the organization exists, and what it hopes to accomplish. These statements are designed to motivate and inspire staff and leadership toward the “higher goals” they express, and can also help guide the day-to-day activities of the organization (Sample Mission Statements from large and small organizations can be found in Appendix 9).

Closely associated with the Mission Statement, and often included with it, the “character” of an organization can be described more fully by expanding upon the Mission Statement and expressing a set of ethical standards – sometimes called a “Code of Ethics.” The Code of Ethics can be very broad and describes the vision and guiding principles for an organization, what it aspires to accomplish, and how children and youth will benefit from its efforts. It should also reflect a commitment to child/youth safety (See examples in Appendix 9).

Depending on the size of the organization and available resources, some YSOs may have developed only a Mission Statement or a Code of Ethics, or even combined them. There are no hard and fast rules. The benefit they provide, however, is that they can help to guide staff and volunteers in making decisions in day to day interactions with coworkers and with children and youth – especially in those unique or emergency situations where there may be a lack of clear direction. Again, a Code of Conduct is limited in that it usually refers only to the most common and expected behaviors one is likely to encounter in day to day operations. Should behaviors occur that are not covered under the Code, individuals can refer to the Mission Statement/Code of Ethics to determine an appropriate response. For additional information, see “Guidance on Constructing Codes of Ethics and Conduct” in Appendix 9.

The basic elements of a Code of Conduct are listed in the following table:

Table 4
Basic Elements of a Code of Conduct

- Mission Statement
- Ethical Principles and Standards
- Guidance on, and definitions of specific behaviors/interactions common and relevant to the YSO
 - Appropriate, inappropriate, harmful
 - Encouraged vs. prohibited behaviors and interactions
- Reporting obligations, procedures and process
- Investigation and monitoring procedures
- Statement of Receipt and Agreement
- Signature Block

Developing Guidelines on Interactions between Individuals

Appropriate, positive interactions among youth and between employees/volunteers and youth are essential in supporting positive youth development, making children and youth feel valued, and providing the caring connections that serve as protective factors for them (see “What is the Positive Youth Development Approach” in Appendix 9). Conversely, inappropriate or harmful interactions put children and 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, and the expected responses when they are observed (up to and including making a report to the Department of Children and Families), can be spelled out in the Code of Conduct.³⁸

For example, Codes of Conduct for child and youth serving organizations generally try to draw attention to the power differential that exists between adults (and others in authority) and children/youth, and the responsibility to maintain appropriate physical, emotional and verbal boundaries. They emphasize the use of discretion when touching a child – with examples of appropriate and inappropriate touch. Examples of various kinds of appropriate, inappropriate and harmful behaviors can be found below:

³⁸ Saul J, Audage NC. Preventing Child Sexual Abuse Within Youth-serving Organizations: Getting Started on Policies and Procedures. Atlanta (GA): Centers for Disease Control and Prevention, National Center for Injury Prevention and Control; 2007.

Appropriate	Inappropriate	Harmful
<ul style="list-style-type: none"> •High fives •Handshakes •Fist bumps •Side hugs •Pats on the back or shoulder •Holding hands crossing the street (younger children) •Verbal praise •Positive reinforcement for good work or behavior •Tending an injured child/youth 	<ul style="list-style-type: none"> •Tickling, wrestling •Rough housing •Piggyback rides •Backrubs or massage •Seating a child on one's lap •Patting on the buttocks (sports) •Unwanted affection •Photographing without permission •Giving/receiving gifts, or •Contact via electronic or social media without permission 	<ul style="list-style-type: none"> •Grabbing, shaking •Slapping, spanking •Pinching, pushing •Kicking •Touching private body parts •Intimate, romantic or sexual contact •Belittling, embarrassing •Shaming •Referencing physical development or appearance •Showing pornography

As a rule of thumb, physical contact between adults and the children/youth they supervise should always be public, age-appropriate, and non-sexual in nature. Organizations will need to find a balance between encouraging positive and appropriate interactions and discouraging inappropriate and harmful interactions. When accomplished, strategies with this balance in mind help to ensure that youth can benefit from program participation without risk of sexual abuse or harm.

When inappropriate or potentially harmful behaviors occur, it is important that organizations work to ensure that anyone observing those behaviors feels free to speak up even if the individual is unsure about to what to do next. Suggestions as to how this can be accomplished are presented below and will outline a multi-pronged approach.

The boundaries between appropriate, inappropriate and harmful behaviors are not always clear in every situation. Some can be handled internally by closer supervision, and others need to be reported to law enforcement and/or DCF (see Reporting and Responding section below). Communication from leadership and supervisors will be key. When general safety policies and a Code of Conduct are talked about and reinforced through supervision, at staff meetings, and during other training or professional development opportunities, it becomes easier and safer for staff and volunteers to talk about the day-to-day behaviors that are causing them some concern. The less reluctance there is, the safer the environment becomes for everyone.

Other behaviors and circumstances that can be addressed in Codes of Conduct include how to handle 1-on-1 meetings with children (either prohibiting them or setting guidelines as to when and

how they may take place (i.e., only meet with children where other adults can have open access or the ability to observe); prohibitions against smoking, alcohol and drug use, profanity or jokes with sexual innuendo when around children; prohibiting contact with children outside of the professional or organizational relationship; and a clear statement about the requirement to comply with the Massachusetts child abuse and neglect reporting laws (See sample Code of Conduct in Appendix 9).

Implementing a Code of Conduct

Once a Code of Conduct is in place, it is important to implement it, through training and disseminating the information widely and in a variety of ways. All current staff and volunteers should receive in-person training and sign acknowledgement of having received the Code of Conduct for their personnel file. Similarly, reading and signing the Code of Conduct should be integrated into the hiring process for new employees and volunteers. Training and acknowledgement should be renewed annually.

Consider sharing some of the main points from the Code of Conduct with parents and participants, in appropriate language and detail. For example, if the organization prohibits children and youth from being alone with staff, any employee or volunteer who observes a staff member alone with a child or youth participant should know to intervene, and either talk to the staff member, or talk to a supervisor to have the behavior corrected. Sharing that rule with children and youth could also increase safety by making them aware that a staff member who tries to get them alone is breaking the rules, and that they should tell someone. Likewise, a parent, hearing a child report that they were alone with a staff member, would know to notify the organization.

Smaller organizations can also create abbreviated Codes of Conduct for adults, children and youth (for example, as part of a studio handbook) that include such things as behaving appropriately; speaking respectfully to staff, instructors, parents, and other children (even competitors); and respecting the rights of others (See sample format in Appendix 9).

Monitoring Behavior

Goal: To reinforce positive, age-appropriate, healthy behaviors and interactions, and to prevent, recognize, and respond to behaviors that cause concern but are correctable, or to behaviors that are inappropriate or harmful.

General Principles

Monitoring involves observing interactions and reacting appropriately. This includes both employee and volunteer with children/youth, and child-on-child and youth-on-youth interactions. Youth leaders often require more supervision and monitoring because they are young, lack

experience, may lack judgment, and are harder to screen. Define areas requiring monitoring based on the organization's mission and activities.

All staff must be able to easily discern inappropriate behavior and harmful actions. Leadership should always model appropriate interactions and utilize staff meetings, and individual and group supervision to give frequent feedback, both positive and constructive, providing staff with motivation to maintain a safe environment. Staff members will look to their leadership to set the tone, and show that communication about behaviors is a normal part of doing business – not a taboo. These actions help to build and maintain a culture of open communication about matters pertaining to child and youth safety.

Monitor inappropriate or harmful behaviors

Organizations should use multiple monitoring methods to get a clear picture of how individuals are interacting.

- Leadership (administrators, managers and supervisors) should take an active role in observing and monitoring interactions among staff and between staff and children/youth.
 - Maintain a presence in the workplace.
 - Use informal supervision, including regular and random observation (e.g., roving and checking interactions throughout an activity period), and maintain frequent contact with employees/ volunteers and children/youth who interact off-site.
 - Acknowledge, praise, reward, reinforce, encourage and model appropriate behaviors.
 - Use formal supervision, including regular evaluations.
 - Encourage continued vigilance on the part of all staff and volunteers.
- Refer to the organization's Code of Conduct and what has been defined as inappropriate or harmful behavior.
- Understand the boundaries that the organization has established and identify when someone has crossed the line.
 - Refer to the section on Grooming Behaviors above. Behavior that approaches or crosses the line must be addressed immediately. If the behavior was inadvertent, it should be correctable through supervision and continued monitoring. If the behavior continues, it may indicate a situation that should be reported (See section on Responding and Reporting below).
- Look to the Mission Statement/Code of Ethics for guidance in situations not covered in the Code of Conduct.

Monitor potential risk situations

Acknowledge that some situations pose more risk for inappropriate or harmful behavior than others. When situations are more risky, more protective strategies will need to be implemented. Classrooms provide spaces where the interactions between students and between students and other adults (aides, parents, tutors) entering that space are easily observed. Studios, usually with an instructor and one or more aides, also conduct their classes in a confined area and many offer space for parents to observe their activities. These are relatively safe environments because there are multiple “eyes” on the children in a small space.

However, interactions during an overnight trip are harder to monitor than are interactions in a classroom or studio. Taking any of these classes – even with parents/chaperones – on an overnight field trip, an out-of-state performance, a camping experience, or to a competition can vastly multiply risk as well as the steps that must be taken to accommodate and lower that risk. Adult-to-child/youth ratios that allow supervision of all participants 24 hours a day; safe transportation and appropriate sleeping arrangements; bathing and toileting accommodations; and protocols for emergency situations are just a few of the additional protective strategies that must be employed to ensure the safety of overnight events (Also see section on Safe Environments).

It is also important that staff is trained to be even more vigilant during the times where children and youth have been shown to be more vulnerable to abuse: non-structured program time (time between programs, meals, etc.) shower time, trips to the restroom, changing for the pool, etc. No matter where children or youth are during an overnight event, they must always be there with the knowledge of staff – and always under either staff supervision or observation.

Staff Responsibilities

Monitoring and responding to inappropriate behavior is a part of the job of every individual involved in the organization. Supervisors and managers carry additional responsibility for remaining vigilant and available to staff and volunteers who deal directly with children and youth. Staff will also need to know how to respond to behaviors that appear inappropriate or are causing concern, how to intervene appropriately and effectively, and how to report when those behaviors are harmful. Staff are also responsible for helping other staff, especially new staff, understand the Code of Conduct and adhere to its principles. The bottom line is that if a staff member or volunteer sees something, and does not correct or report it, they become part of the problem.

Critical Strategies for Monitoring Behavior

Organizations must be prepared to respond to observed interactions among youth and between employees/volunteers and youth.

Develop a monitoring protocol so that employees/volunteers are clear about their roles and responsibilities. Employees/volunteers should be prepared to respond immediately to inappropriate or harmful behavior, potential risk situations, and potential boundary violations.

- Monitoring child safety and staff boundaries is part of staff job descriptions and is one of the standards measured in regular evaluations.
- One specific staff member, perhaps with the support of a small team depending on the organization's size, has ownership of Child Safety, serves as a resource to other staff and volunteers who have questions about the organization's child safety policies or structure, and drives the ongoing efforts to assess and improve child safety within the organization.
- Checks are also embedded in other information gathering the organization does (annual surveys, internal audits, etc.) by inserting questions about boundaries.
- Trainings are done on a regular basis that support all individuals involved in the organization: developing a healthy self-concept, empowering them to speak for themselves, and providing parents with important information on sexual abuse prevention.
- Enforce the protocol so that appropriate actions follow. Supervisors need to redirect inappropriate behaviors to promote positive behaviors, confront inappropriate or harmful behaviors, and help to report these behaviors to DCF/law enforcement if necessary.

Create a Clear Reporting Structure Within the Organization

If an organization prepares and encourages its staff and volunteers to be aware of behaviors and works to build a culture that supports them in speaking up when they see something that needs correction or is harmful and needs reporting, they need to know clearly and unambiguously who they should be contacting and speaking to.

A reporting structure should define the "chain" of people to whom reports are to be made when staff and volunteers observe inappropriate or harmful behaviors. It is also important to let them know that they can use the reporting structure to question confusing or uncertain behaviors and practices. Seeing the individuals in the reporting structure as a source of information, clarification and support, and not only as a reporting authority, can make it easier for staff to initiate contact with them. Encouraging staff to ask questions, as well as requiring them to report situations and behaviors that are inappropriate or harmful, can help build trust and establish a communication flow that results in a safer environment for all.

In cases where a report involves the behavior of an immediate supervisor or someone in direct-line authority to the person reporting, organizations will also need to establish a “back-up” reporting option to ensure that the situation comes forward.

Consider publishing and distributing a 1-page flow chart of reporting responsibilities that clearly shows the steps to follow, people to contact and phone numbers to use if abuse is suspected. Also post the chart in all public spaces (See samples in Appendix 11).

Document that monitoring has occurred

Documenting that monitoring has occurred emphasizes to staff and volunteers that the Code of Conduct is taken seriously and that it is an essential part of the organization’s child sexual abuse prevention efforts. Periods during which informal workplace monitoring has occurred should be recorded; as should the number and types of incidents observed or reported. Documentation in performance appraisals shows that more formal monitoring is taking place and promotes a personal and professional stake in helping to maintain a safe environment. These strategies help to ensure accountability, provide opportunities for group and individual recognition, and show that those who have come forward have had their concerns taken seriously. The data generated can also be used (without attribution) in internal audits and in providing updates to the organization and its stakeholders (See also section on Analysis, Review and Self Audit below).

Recommended Implementation and Decision Making Model

STEP 1: Developing the Code of Conduct

- Use the model Codes provided in Appendix 9 to lay out the basic elements of a Code of Conduct and signature page. Consider a simpler Code for children/youth.
- If a YSO is affiliated with a parent or national organization, check to see if they have published suggested Codes of Conduct as models.
- If they exist, compliance with professional licensing, certification, legislative, or regulatory requirements for YSOs concerning staff behavior or interactions may be required. If so, ensure they are addressed and integrated.
- In developing the Code, solicit input from supervisors, staff, volunteers, parents, children and youth in terms of the day-to-day behaviors that are important to them.
- Evaluate the different levels of risk presented by the YSO’s range of activities.
- Provide clear guidance on maintaining appropriate boundaries and list the verbal and physical behaviors that are acceptable, appropriate and expected, as well as those that are prohibited, inappropriate or harmful.
 - Include prohibition of pornography, sexual innuendo in jokes or conversation,

- sexual/intimate contact, discussion of physical/sexual attributes.
 - Include the requirement to follow the child abuse reporting laws of the Commonwealth (Also see section on Responding and Reporting).
 - Include language about the protections in place for people who come forward to discuss or report violations of the Code
- Use the guidance provided to draft a Mission Statement/Code of Ethics to help guide decision making in situations not specifically described in the Code.
- If appropriate, address issues of staff to children/youth ratios, 1-on-1 interactions with children/youth, transportation in personal vehicles, gift-giving, electronic and social media contact with youth (Also see Safe Technology section below), out-of-program contact between staff and children/youth, and drug and alcohol use when supervising children/youth.
- If appropriate, include guidance on high risk situations (changing, bathroom activities, overnight stays, etc.).
- Include the consequences for breaching the Code on the signature page.
- Smaller YSOs, depending on their size, staff, and range of activities can create an abbreviated Code that addresses “Rules and Regulations” for behavior that pertain to staff, volunteers, parents, and youth (see example in Appendix 9).

STEP 2: Implementing the Code of Conduct

- Ensure that the Code provides a description of who is responsible for implementing the Code and to whom concerns or reports should be addressed.
- Distribute the Code to all constituents, including parents and other caregivers with a statement about the YSO’s commitment to maintaining a safe environment for the children and youth in its care.
- Integrate reading and signing the Code into the screening and hiring process for new employees and volunteers.
- All current staff and volunteers should be trained on the Code and sign the Statement of Receipt and Agreement. Include a copy of the statement in their personnel file.
- Integrate the Code into the performance appraisal process.
- Include the Code of Conduct in the YSO’s Policies and Procedures, on the YSO’s website and in any marketing, recruitment and advertising activity.
- Reinforce the Code of Conduct at staff meetings, during group and individual supervision, and other professional development opportunities.
- Ensure that once reported, all allegations are addressed in line with the organization’s protocol.

STEP 3: Monitoring and Documenting the Code of Conduct

- Leadership presence in the workplace with an active role in observing and monitoring interactions among staff and between staff and children/youth is essential.
- Develop a monitoring plan that will help determine if and how the Code of Conduct is being implemented.
 - Use the opportunity for positive reinforcement or constructive critique
 - Helps build a culture of awareness, keeping eyes open, mutual responsibility and dialogue
- Collect data on the types and frequency of reports, allegations and complaints to help identify areas that need to be addressed, or lack of clarity in the Code.
- Share the data with staff and volunteers, ask for feedback and use the data to periodically evaluate, revise and update the Code

SECTION 4: Ensuring Safe Physical Environments and Safe Technology

Executive Summary

When parents, grandparents and other caregivers entrust their children to an organization's care, they do so with the expectation that the organization will not only provide good quality services, but has also taken the necessary steps to ensure the child's physical safety and well-being. Of course, no organization can claim that its premises or programs are completely safe, and children and youth – especially younger children – are extremely vulnerable to the choices and judgements of the people taking care of them. But organizations can employ best practices strategies to look at all safety factors and areas of risk, including the physical and virtual spaces children inhabit, and work to strengthen the safety and security of those environments. The key strategies to employ, either on-site or off-site, are visibility, access, supervision/training and communication. Sample checklists YSOs can use to inventory their Safe Environment capabilities are included in the Resources section and in Appendix 10.

Programming for children and youth takes place in a wide range of settings over which organizations have varying degrees of control. Some YSOs operate in space that was designed specifically for the activities and services they offer to children, youth and families. In other cases, YSOs utilize space that was designed for entirely different purposes. In mentoring and relationship-oriented programs, there is no single identified space for the activities to take place – except perhaps in the mentor's home. Any of these can present significant challenges in offering safe places for children and youth. Policies and procedures to establish safe physical environments, including supervision of children and youth within those environments, should

strive to meet best practice standards while recognizing and accounting for the limitations and realities of the settings.

From a physical perspective, the rule of thumb in protecting children is visibility. The greatest fear of those who would sexually abuse or victimize children is being discovered. In this section, YSOs are encouraged to take actions to design, build or adapt existing spaces to maximize visibility, and to minimize or eliminate space where children and youth cannot be seen. Multiple strategies, suggested practices and resources to help achieve these goals are presented for both on- and off-site, as well as overnight activities. It is also suggested that YSOs create a “safety committee” that periodically conducts site surveys noting potential problem areas and/or maintenance needs.

Complementing the physical aspects of safety are the procedural aspects of safety and security, and how access to the physical space – and thus to the children and youth – is granted and monitored. All adults who enter the space occupied by the YSO’s children and youth should have a purpose for being in that space, and a role that is understood by all its occupants. There should be control over access points, and procedures for admitting individuals into the facility, verifying their identity, signing them in and out of the space and badging or some other outward sign of who they are (Parent, Visitor, Contractor, etc.). Likewise, once inside the facility, the identity of supervisors, staff, and volunteers should be clear to all so that anyone will know whom to approach with a concern, question or emergency should the need arise.

Other strategies discussed are maintaining an updated list of the individuals who are authorized to pick up a child/youth from the facility, procedures for releasing a child/youth to their custody, and the steps to follow if their identity cannot be confirmed or they are not on the list. YSOs should also establish emergency procedures to follow if an unauthorized or unknown person gains access to the facility.

Along with site safety, visibility issues, physical access and security procedures, supervision is another critical aspect of creating and maintaining safe environments for children and youth. Simply stated, adequate supervision of children and youth depends on vigilance – no child or youth in a YSO’s care should be anywhere – at any time – without the knowledge of, or without being under the direct supervision of a staff member or adult volunteer. Effective supervision always includes adult awareness of the child’s/youth’s whereabouts, having the child/youth within sight, and monitoring and/or participating in the child’s/youth’s activities and interactions. An efficient means for staff to communicate with one another is particularly important when the YSO’s facilities are spread out in large spaces or are dispersed into separate rooms or multiple buildings.

Of course, the ability to accomplish and maintain this level of supervision will depend on the ratio of adults to children and youth established by the organization's leadership. Guidelines on the suggested ratios of adults to children/youth exist, but are not universal. Because there is no standard ratio for all situations, the Task Force encourages all YSOs to consider in their decision making process such variables as the age and development levels of the children and youth they serve (lower ages or development levels may necessitate fewer children/youth per supervisor); the age of volunteers (older teens who are not adults should always work in tandem with an adult supervisor); the risk associated with the activity; the location of the activity; and the ability to monitor and keep track of individual children/youth (on/off-site, classroom or park, etc.). Safety strategies for overnight trips are also addressed. Even with a satisfactory ratio of employees and volunteers to children and youth, training, monitoring and staff supervision will need to emphasize the need to keep attention and interactions focused on the children/youth and to avoid distractions like cell phones, checking email and personal conversations.

Also addressed in this section is the situation where YSOs are responsible for transporting children to and from regular YSO activities and special events. Of course, circumstances will differ depending on the size of the organization and the services it provides. Large YSOs may employ professional transportation companies to transport their students or clients on a daily basis. Other organizations may purchase their own vehicle(s) and hire one or more drivers. Others, by the nature of their services (or size), may rely on supervisors, employees, volunteers or parents to transport children and youth in their personal vehicles. Each of these situations carries the potential for inappropriate contact with the children/youth being transported. Although some of the larger organizations (e.g., public schools) are subject to regulatory requirements for the screening and hiring of drivers, many YSOs are not. Strategies are offered to help maximize the safety of all involved.

Finally, the prolific use of the Internet and social media by children and youth presents a special set of challenges for YSOs. Cell/Smart phones, tablets and other mobile devices provide children and youth with immediate and constant access to the Internet as well as to a wide variety of methods, sites and apps to communicate with individuals and groups on a daily basis. This "virtual" or "cyber" (rather than physical) environment has become a primary source of information (and entertainment), and helps children and youth build skills in communication, collaboration, and research and information management – skills they will eventually need in their future education, employment and professional work.

However, as children and youth access and navigate this ever-evolving information landscape, these technologies can also be used to cause harm (cyber-bullying), access inappropriate or

sexually explicit material and information (sexting, pornography), and in some cases, as a means by which offenders can engage and groom children and youth for eventual abuse (Also see section on Grooming above). Given this reality, and depending on the nature of the YSO's services, the Task Force suggests that YSOs develop and adopt social media and "responsible use" policies that outline the acceptable and prohibited uses of cell phones and other devices for staff and volunteers to communicate with children and youth, and incorporate them into their safe environment policies, rules and regulations, and Codes of Conduct (Also see Code of Conduct section).

Key Findings and Recommendations

- There are both physical and procedural aspects of establishing safe environments for children and youth. Each is defined and explained.
- Physical aspects include strategies to ensure the visibility of children and youth in all spaces and at all times (clear sight lines, removal of obstructions, adequate lighting, mirrors and cameras, secure areas where a child could be isolated or entrapped, etc.).
- Procedural aspects include creating policies and practices for on and off-site supervision, staff-to-child ratios, use of toilet, shower and changing facilities, 1:1 interactions, etc.
- In some cases, YSO's are subject to external safety requirements (e.g., those requiring licensure). Managers need to ensure awareness of and compliance with all local and state regulatory agencies.
- Minimum required safe environment standards are presented with a decision process to determine additional needs in the areas of visibility, access, supervision/training.
- Suggestions are also made for applying the above physical and procedural aspects of safety to off-site and overnight activities and accommodations.
- Guidelines for the safe transportation of children/youth (when necessary) are addressed.
- Establishing a staff/youth safety committee is also recommended. The committee can conduct periodic site surveys (See sample in Appendix 10) to point out safety "trouble spots" and areas in need of attention, and build a sense of ownership and shared responsibility.
- Guidelines are also provided on establishing social media policies to define appropriate levels of interaction between staff, volunteers and children/youth.

Recommended Implementation and Decision making Model

STEP 1: Determine if the Minimum Physical and Procedural Standards for a Safe Environment are Present.

- Minimum physical standards include:

- Facilities designed or adapted to ensure clear sight lines
- All children and youth can be seen
- Unused areas/rooms secured and locked
- Off-limits areas clearly marked
- All areas well lit
- Safety rules and regulations posted
- Minimum procedural standards include rules and regulations for using the space:
 - Child/youth entry and release procedures (Check-in/sign-in/sign-out)
 - Visitor entry policy and expectations while in facility
 - “No closed-door” policy
 - Rules about 1-on-1 meetings
 - Adequate staff-to-child/youth ratios for supervision, and a clear understanding of which adults are responsible for which children and youth
 - Procedures for bathroom use, and changing and shower facilities (if applicable)
 - Code of Conduct for employees/volunteers/children/youth (see Code of Conduct section)

STEP 2: Determine what additional activities, circumstances, risks or regulatory/licensing or accreditation requirements pertain to the YSO.

- Are there additional requirements established by local, state and national organizations/agencies?
- What size and how dispersed are the physical space(s) occupied by the YSO?
- What kind of control does the YSO have over the design, maintenance, utilization of, and access to the physical space it occupies?
- Is transportation to/from the YSO and/or to/from YSO activities one of the services the YSO provides?
- Are overnight activities, trips, competitions, exhibitions, etc. conducted by the YSO?
- Are 1-on-1 interactions between staff/volunteers and children/youth (mentoring, tutoring, counseling, etc.) a normal part of the services provided?
- Do the ages and circumstances (intellectual/physical disabilities or other limitations) of the children/youth being served, and the risk of the activity require modification of the staff and volunteer to child/youth ratio? How and when?
- By what means will staff and volunteers be able to communicate with one another – especially in emergency situations – if they are not co-located
- Is electronic communication between staff/volunteers and children/youth prohibited/necessary/allowed and under what circumstances?

STEP 3: Select and utilize additional safe environment measures as needed

- Understand and implement additional statutory and/or regulatory requirements.
- Additional staff will be required for supervision of multiple rooms, or space on multiple floors or in different buildings. A clear way to identify staff (badges, tee-shirts, caps) and an efficient means for staff to communicate with one another (walkie talkies, company cell phones, etc.) are important for larger spaces.
- If it is necessary for vendors and other service providers to enter the premises, procedures for entry, identification, badging, monitoring and notification to all staff should be employed. Children/youth also need to know that work areas are off-limits.
- Larger spaces may require surveillance cameras and mirrors to monitor adequately, and the designation of a single (possibly monitored) entry point to minimize/eliminate unauthorized entry by adults, and children/youth “wandering” through the building
- Spaces not owned by the YSO (and unable to be modified) or that are in buildings with public access, will need additional signage to steer children/youth away from areas that are off limits, accompaniment to toileting facilities (for younger children), and periodic security checks of any public spaces through which children/youth must pass.
- Mentoring and relationship-oriented programs that require 1-on-1 meetings off-site will require visiting/inspecting the mentor’s home and additional supervision and vigilance.
- Off-site activities will require policies and procedures about the use of YSO transportation (ensure parental consent), additional screening of drivers (Also see section on Screening and Hiring), policies about the use of personal vehicles to transport children and youth or, alternately, reliance on parents and other caregivers to transport their children to and from events.
- Overnight activities will require additional policies about room accommodations and sleeping arrangements, who is allowed in the rooms, who will check in on the children/youth and how often, etc.
- If necessary, the use of social media and electronic communication between YSO personnel and children/youth should be governed by a social media policy and outlined in the Code of Conduct (See sample policy in Appendix 9).³⁹
- It is important for YSO leaders to periodically (at least annually) update themselves and their staff on advances in social media technologies in order to evaluate and review how these safe environment protocols are working and whether/how they need to be revised in order to remain effective.

End of Executive Summary

³⁹ An online database of social media policies for various industries and organizations can be found at: <http://socialmediagovernance.com/policies/#axzz1t9QE04Ym>

Goal: To establish optimal safe physical environments to reduce the risk of child/youth sexual abuse and exploitation.

General Principles: Environmental strategies will vary depending on the organization and the physical spaces utilized for programming and activities. In some cases, a YSO will be able to utilize or build physical space designed specifically for the “goods and services” it provides to its children and youth. In many other cases, however, organizations will rent or utilize physical space that may have been originally designed for an entirely different purpose – and may not have the ability or funds to adequately modify them. In these situations, offering a safe place for children and youth may come with additional challenges. In still other cases, YSOs will take its children and youth off-site for various activities. The risk of the environment should be considered regardless of the size of an organization’s physical space. If an organization does not control its own space, back-up strategies should be used to ensure that children, youth, employees and volunteers can be monitored.

In addition to the safety considerations about the physical space occupied by the YSO, are the procedures, guidelines and rules about how that space – especially when occupied by children and youth – is accessed and utilized. This section will talk about both the physical and procedural aspects of building and maintaining a safe environment from the minimum required standards that every YSO should consider implementing, to the more complex aspects of maintaining a safe environment when a YSO occupies a large, dispersed space, or when a YSO takes its children/youth off-site and/or on overnight trips. A decision making strategy to help YSOs determine when additional safe environment elements should be added to the basic requirements is also presented. As a starting point, Table 5 (below) lists a set of minimum safe environment standards to consider as a baseline for decision making. The key strategies to employ in creating safe environments for children either on-site, off-site, or on overnight trips are visibility, access, supervision/training and communication.

YSO leadership is responsible for the continued oversight of these guidelines as well as compliance with all local and state regulatory agencies including the Departments of Early Education and Care (EEC), Mental Health (DMH), Youth Services (DYS), Elementary and Secondary Education (DESE) and local health departments.

Table 5
Minimum Safe Environment Standards

Minimum physical standards include:

- Facilities designed or adapted to ensure clear sight lines
- All children and youth can be seen
- Unused areas/rooms secured and locked
- Off-limits areas clearly marked
- All areas well lit
- Safety rules and regulations posted

Minimum procedural standards include rules and regulations for using the space:

- Child/youth entry and release procedures (Check-in/sign-in/sign-out)
- Visitor entry policy and expectations while in facility
- “No closed-door” policy
- Rules about 1-on-1 meetings
- Adequate staff-to-child/youth ratios for supervision, and a clear understanding of which adults are responsible for which children/youth
- Procedures for bathroom use, and changing and shower facilities (if applicable)
- Code of Conduct for employees/volunteers/children/youth/parents (see Code of Conduct section)

Critical Strategies for ensuring safe environments

VISIBILITY:

Principle: To ensure maximum visibility of all children, youth and adults present at all times.

Whether a YSO has the ability to control the design of its space or not, a key element to the physical safety of its facility is to continuously be able to account for all the children and youth for which it is responsible. From this perspective, the rule of thumb in protecting children and youth is *visibility*. The greatest fear of those who would bully, assault, steal from, sexually abuse or otherwise victimize children is being seen. YSOs of any size are encouraged to take actions within their means to design, build or adapt existing spaces to maximize visibility, and to establish policies and procedures for access to and use of the space including the following:

On-site:

- Design or adapt spaces so that they are open and visible to multiple people;
- Use mirrors inside and out if needed to ensure visibility;
- All doors should have windows if possible. When rooms are in use, doors should be left open or ajar;
 - When it is necessary to meet with children/youth behind closed doors, ensure that another adult knows about the situation.
 - If interactions cannot be directly and continuously observed, they should be interruptible.
 - Exceptions, including bathrooms and bedrooms, should have clear policies and procedures regarding who is allowed behind the closed door and under what circumstances.
- Secure all areas where a child could be entrapped, isolated or concealed (boiler rooms, unused rooms, maintenance closets, etc.);
- Use signage to clearly identify areas that are off-limits, or that require adult/staff supervision when in use;
- Use bright lighting to eliminate shadows;
- Maintain clear lines of sight as much as possible (e.g. minimize “blind corners” and “blind spots” where behaviors cannot be observed, clear halls of any obstructions, ensure that check-in people can see where participants are going);
- Landscape outside to maintain the same principles;
- Develop policies to address: on-site supervision of children including staff to child ratios^{40,41,42}, guidelines for when children are out of sight, and access by parents to tour the space and observe activities;
- Establish on-site toileting, showering and personal grooming spaces policies (Also see Code of Conduct section):
 - Address who has access to accommodations such as bathrooms, showers and changing rooms, when they can be accessed, and with whom.
 - When possible, establish separate bathrooms for adults and children/youth, prohibit adults from using a bathroom at the same time as children/youth, and clearly post rules.

⁴⁰ See American Camp Association recommendations at: www.acacamps.org/resource-library/accreditation-standards/aca-standards-relate-staff-screening-supervision-training

⁴¹ See National Resource Center for Health and Safety in Child Care and Early Education: <http://cfoc.nrckids.org/StandardView/1.1.1>

⁴² See Massachusetts Afterschool Research Study Report: <http://www.niost.org/pdf/MARSReport.pdf>

- Develop policies to clearly delineate procedures and access when hands-on assistance by an adult is required for toileting, grooming or change of clothes.
- Address potential contact between children and youth who are using bathroom facilities at the same time, paying special attention to circumstances where they may be a significant age differential between them.
- Ensure that the above issues are also addressed in the organization’s Code of Conduct as well as orientation and/or training for all staff and volunteers (see the Code of Conduct section in this report for additional details).
- If possible, establish a Safety Committee of staff and youth (and possibly a few parents) that periodically walk the premises and conduct safety surveys noting such things as potential problem areas and maintenance needs. This action can establish a sense of “ownership” and responsible citizenship.

Off-site:

- Maintain clear lines of visibility to all children and youth as much as possible (i.e. keep doors open to allow observation). Consider avoiding activities in areas where that is not possible.
- When possible, visit and know the layout of areas to be used beforehand, and clearly define what areas are off limits.
- Establish policies to address off-site supervision of children and youth related to visibility including staff to child/youth ratios (which may differ from on-site ratios), required proximity of group participants, and identifying clothing such as common tee-shirts or caps when appropriate.
- Ensure that interactions which cannot be directly and continuously observed are interruptible.
- Establish policies for off-site toileting, showering and personal grooming spaces:
 - Address how to access public accommodations such as bathrooms, showers and changing rooms, when they can be accessed, and with whom.
 - Conduct a safety check before allowing a child into a public restroom. Have adults accompany younger children into the public restrooms designed for multiple users.
 - Clearly define the accepted practice for the use of public bathrooms, locker rooms, and changing areas. Review with adult supervisors before a trip to a new location to make sure that the likely circumstances and scenarios at that site have been considered.
 - Clearly delineate procedures and access when hands-on assistance by an adult is required for toileting, grooming or change of clothes.

- Address potential contact between children and youth who are using bathroom facilities at the same time, paying special attention to circumstances where they may be a significant age differential between them.
- Ensure that staff and volunteers are trained or briefed on these policies and procedures beforehand, get their questions answered, and understand them. The children/youth will also need to understand what is expected of them.

Overnight Trips: Overnight trips present different challenges related to visibility. If youth are staying in hotel/motel rooms, policies and procedures should:

- Clearly define who is allowed to room with each other, and who is allowed in rooms occupied by children and youth and rooms occupied by adults.
- Clearly define who will check on the children/youth in their rooms, under what circumstances and how frequently.
- Ensure two adult supervisors are present when entering a child's or youth's room and children/youth should not be allowed to enter an adult's room.
- Ensure that non-related adults room separately from children and youth.
- Place over 18 and under 18 youth in separate hotel/motel rooms. Exceptions are appropriate for siblings with parental request.
- Fully inform parents of the sleeping arrangements before the trip.
- Inform parents if groups are staying in a common area such as a gym or a bunk house where adults, children and youth will be housed together:
 - Define and mark separate sections for children, youth and adults. Separate groups by age and gender when possible/appropriate.
 - Separate over 18 youth from youth and children under 18.
 - Assign adults in teams to watch over the children and youth.

ACCESS:

Principle: To ensure that access to the physical space – and to the children and youth – is monitored and that all adults present have a specified role known to the staff and participants.

Complementing the physical aspects of safety are the procedural aspects of safety and security, and how access to the physical space – and thus to the children and youth – is granted and monitored. All adults who enter the space occupied by the YSO's children and youth should have a purpose for being in that space, and a role that is understood by all its occupants. There should be control over access points, and procedures for admitting individuals into the facility,

verifying their identity, signing them in and out of the space and badging or some other outward sign of who they are (Parent, Visitor, Contractor, etc.). Likewise, once inside the facility, the identity of supervisors, staff, and volunteers should be clear to all so that anyone will know whom to approach with a concern, question or emergency should the need arise. Finally, all staff and volunteers should know which children and youth they are responsible for, and should know their whereabouts at all times. All children and youth should know which adult is primarily responsible for them and to whom they should go for assistance or in times of need.

On-site:

- Clearly define the physical program boundaries and mark them with signage;
- Designate a single point of entry if possible (smaller facilities may only have a single entrance);
- Monitor the entry and exit points at all times if possible. If not possible, have clear policies and procedures for how to control who has access;
- Limit/eliminate access to closed off spaces and clearly define what areas are off limits. Areas that are off limits should be clearly marked and locked if possible;
- Develop and implement policies and procedures for admitting and releasing youth so their whereabouts are always known;
- Establish written policies and procedures that clearly define which people outside of your organization are allowed in and how to monitor that (picture ID upon entry, sign-in/out log, visitor badges, etc.);
- Obtain a list of any person(s) authorized in writing by the parent/caregiver to take the child from the program or to receive the child at the end of the day (include providing identification when appropriate). Ensure this list is updated regularly;
 - Also ensure that parental/family/caregiver phone numbers are current so they can be called in the event that an individual claims to be authorized to take the child/youth, but is not on the list.
- Non-screened adults with access to the site must be accompanied by a screened adult who takes responsibility for supervising/monitoring that individual while on site;
 - Conduct a thorough reference and background check on all employees, volunteers and other members of the community whose potential employment or volunteer service activity involves direct and unmonitored contact with children (see report section on Screening and Hiring for more information).
- Define the purpose for the presence of people outside the organization who have access to the site. Restrict vendors and other service or maintenance providers to the area in which their service is being provided. Notify supervisors, staff, and volunteers

that they are on the premises (and where), and prohibit children/youth from entering the work areas unless escorted;

- Ensure that adult supervisors are easily identified by everyone present (supervisor badges, lapel pins, labeled clothing and/or caps, etc.);
- Develop an emergency action plan that identifies what to do if an unknown or unauthorized person gains entry to the site. Include the steps to follow, phone numbers for local law enforcement, and post it prominently, and;
- Clearly identify when responsibility for a child is transferred from a parent/guardian to the organization staff, and from organization staff back to the parent/guardian.

Off-site:

Because it may not be possible to control access to physical space during off-site activities, policies and procedures need to focus on ensuring the safety of the children and youth in the organization's care rather than controlling the public access and security of the physical site which may be the responsibility of the host organization or facility owner.

- Assign each child/youth to an adult supervisor for the off-site activity, and clarify to both parties who is responsible for supervising whom. Set adult/supervisor/child/youth ratios appropriate to the age, developmental levels and behavioral traits of the youth, the activities and the setting;
- Clearly define and communicate the off-site physical boundaries. When possible, clearly mark the boundaries;
- Ensure that children and youth know how to immediately access a supervising adult at all times;
- Ensure that supervisors carry cell phones or radios to allow for communication between those who may become separated. Again, this may also be a good idea if the YSO inhabits a facility that is spread out geographically. Provide youth and supervisors with a list of those numbers;
- Train all adults and youth on policies and procedures related to access during off site activities including what to do if an unknown or unscreened adult attempts to interact with the children or youth, and;
- Clearly define and review procedures for control of access on overnight trips with all adults and youth immediately prior to the trip.

SUPERVISION:

Principle: To create a safe environment by assuring proper adult supervision of children and youth. Ideally, no child or youth should be out of the line of sight of a supervising adult.

Along with site safety, visibility issues, physical access and security procedures, supervision is another critical aspect of creating and maintaining safe environments for children and youth. Simply stated, adequate supervision of children and youth depends on *vigilance* – no child or youth in a YSO’s care should be anywhere – at any time – without the knowledge of, or without being under the direct supervision of a staff member or adult volunteer. Effective supervision always includes adult awareness of the child’s/youth’s whereabouts, having the child/youth within sight, and monitoring and/or participating in the child’s/youth’s activities and interactions. An efficient means for staff to communicate with one another is particularly important when the YSO’s facilities are spread out in large spaces or are dispersed into separate rooms or multiple buildings, and when traveling off-site or during overnight trips.

On-site:

- Create written policies and procedures for supervision of youth during onsite activities which are reviewed with all staff, volunteers, and children/youth when appropriate;
- Set adult supervisor/child/youth ratios appropriate to the age, developmental levels and behavioral traits of the youth, and the activities and setting;
- Clearly identify adult supervisors so they can be recognized by other adults, the children and youth, and those outside of the organization;
- Inform each adult supervisor about children and youth they are responsible for at any given time. Inform youth about which adults are responsible for their supervision at any given time, and;
- Clarify that older youth who are given responsibility for assisting with the supervision of younger children always work in tandem with a screened adult over the age of 18.

Off-site:

Written policies and procedures for supervision of children/youth during off-site activities may need to change with each off-site location and should be reviewed with all staff, volunteers, parents, and children/youth when appropriate, with a special emphasis on anything that is unique to the particular setting.

- Set adult supervisor/youth ratios appropriate to the age, developmental level and behavioral traits of the youth, the activities, and the setting. Note that ratios likely need to be adjusted (fewer youth per adult) for off-site activities;
- Clearly identify adult supervisors for other adults, youth and children, and those outside of the organization. For off-site activities, visible cues can be important including badges, specific caps or tee-shirts;
- Ensure that each adult supervisor knows which children/youth they are responsible for at any given time. Inform children and youth about which adults are responsible for their supervision. For off-site activities, inform adult supervisors that they are responsible for knowing where the children/youth are at all times and children/youth should be in their line of site whenever possible;
- Train staff to be even more vigilant during the times where children have been shown to be more vulnerable to abuse: non-structured program time (time between programs, meals, etc.) shower time, trips to the restroom, changing for the pool, etc.;
- Instruct children and youth on what to do if people outside of their organization approach them during an off-site activity, and;
- Provide additional supervision and observation when children or youth have one-on-one contact with adults, as in a mentoring or other similar program (Also see Code of Conduct section).

TRANSPORTATION:

Principle: To ensure that children are not at increased risk of abuse during transportation activities

Many YSOs provide transportation to children and youth – either on a regular or occasional basis. Large YSOs may employ professional transportation companies to transport their students or clients on a daily basis. Other organizations may purchase their own vehicle(s) and hire one or more drivers. Others, by the nature of their services (or size), may rely on supervisors, employees, volunteers or parents to transport children and youth in their personal vehicles. Each of these situations carries the potential for inappropriate contact with the children/youth being transported. Although the larger organizations (e.g., public schools) are subject to regulatory requirements for the screening and hiring of drivers, many YSOs are not (Also see Screening and Hiring section above).

YSOs that provide transportation under any circumstances should define in their policies who is responsible for transporting youth to and from regular activities and special events. Some questions to consider: Can children/youth ride with an employee/volunteer? Under what

circumstances? What are pick-up procedures at the end of the day or an event? (Codes of Conduct normally prohibit staff and employees from driving children home if parents are late).

YSOs should clearly state transportation arrangements and requirements in writing to parents and other caregivers. Children and youth are, and have been susceptible to sexual maltreatment while being transported as part of an organization's program. Drivers are also susceptible to false allegations when alone with a child being transported. For these reasons, organizations need to consider their transportation policies. The opportunities for drivers to be alone in a vehicle with a child/youth who is not their own should be minimized.

- Obtain written parental consent for transportation of children and youth;
- Avoid having a child or youth travel alone in a vehicle with one adult if possible (in mentoring or relationship oriented programs this will be unavoidable, but can be dealt with through supervision and contact with the family and child/youth). Ideally, there should be more than one adult and/or more than one child/youth in the vehicle;
- Eliminate the potential for physical contact if a single child and adult are alone in a vehicle by having the child sit in the back seat;
- Avoid using vehicles with tinted windows that inhibit visibility from the outside of the vehicle;
- Do not use panel vans or trucks for transporting children and youth;
- Establish policies that clearly address practices for transporting children and youth;
- Ensure that policies and procedures related to transportation comply with all state laws that pertain to the organization (i.e., maintenance and inspection of vehicles/buses, pre-hire screening for drivers, driving records check, criminal and sexual offender records checks, etc.);
 - If using a contractor to supply transportation, ensure that the company has complied with the above, and has screened its drivers, and;
- Establish policies, procedures and check-in/check-out protocols for knowing where drivers are supposed to be at any given time.

TECHNOLOGY:

Principle: To ensure that the use of social media and technology is open, visible and appropriate.

At one time, YSOs needed to worry only about the physical environment within the building(s) where their services were being provided. Today, however, the environment extends beyond the physical and into the realm of virtual space – a world where geographic and physical boundaries

are absent. Electronic and social media have, and continue to become, a significant part of everyday life – especially for children and youth. Undoubtedly, additional social media technologies, tools and devices will be developed in the future, and will continue to grow in sophistication and usefulness. In a matter of only a few years, they have profoundly changed the nature of communication forever, and are already a preferred means of communication among children and youth.

The skills learned in social networking – cooperation, collaboration, the management of information, organization, communication, etc. – are key skills for children and youth as they prepare for the totally connected world they not only experience now, but will also have to navigate in future employment and professional work.

Nevertheless, social media can, and has been misused and employed to facilitate communication among youth and between adults and youth in ways that are inappropriate, violate boundaries, and do not reflect the standards of visibility or accountability. The 24/7 nature of social media communications blurs many boundaries as our formerly private spaces become more public. Questions of liability for YSOs cannot be ignored. Thus, efforts at building a safe environment must also take the cyber-environment into account. YSOs should consider adding social media policies or statements to their safe environment frameworks. Suggested elements include the following:

- Develop written policies and procedures to address: communication between adults and children/youth using technology and social media, the use of videos or still photographs with program or personal devices and the use of those images, the use of personal technology devices while at the program and the supervision of the use of technology by children and youth while at the program;
- Organizations (if able) should consider the use of appropriate monitoring software on computers being used by children and youth;
- If an organization chooses to use social media for communication, those accounts should belong to the organization. The sites should be monitored by at least two or three unrelated adults when possible;
- Prohibit adult staff and volunteers from inviting children or youth to participate in their personal social media accounts, and accepting any requests by children or youth to join the adult's page;
- Adult staff and volunteers should never join or participate in the personal social media account of any child/youth members;
- Ensure all email communication with children and youth is done through an email account owned and monitored by the organization whenever possible;

- Ensure any email account used to communicate with children and youth has at least 2 or 3 unrelated adults who actively monitor the emails when possible;
- Obtain written consent from a parent or guardian for all communication and use of technology with children/youth at an email address, phone number, or social media site approved by the parent or guardian;
- When possible, limit electronic communication (e.g. texting) to cell phones issued by the organization. Provide clear written guidelines on acceptable content. Ensure that communications are clear and purposeful;
- When it is not possible to prohibit the use of personal phones for electronic communications by adults (e.g., in a mentoring relationship), provide clear written guidelines on appropriate communication;
- Ensure that computers and other technological devices used at the program are visible to multiple users, including a supervising adult, at all times, and;
- Prohibit the use of technological devices from bathrooms and spaces used for personal grooming (e.g. no photos or videos).

YSOs can and should also partner with parents to ask them for their input and for assistance in monitoring their children's use of social media to contact YSO staff – when they are at home, on vacation, or even over the summer. By encouraging parents to bring any concerns about technology use, YSO leaders can more quickly become aware of and address issues as they arise.

YSOs should also obtain a signed acknowledgement from employees and volunteers that they have received and read the social media policy; and train staff and volunteers on the YSO's policies on the appropriate use of social media, and related issues such as cell phones, texting, and cyber-bullying. Some excellent social media policy guidance and information, including sample Code of Conduct language, acknowledgement forms, and resource lists have been developed by the Boston Public Schools, and can be found in the following:

- *Guidelines for Implementation of Acceptable Use Policy for Digital Information, Communication and Technology Resources*, Boston Public Schools (2002): http://bostonpublicschools.org/cms/lib07/MA01906464/Centricity/domain/1650/checklists/BPS_AUP.pdf
- *Responsible Technology Use in Public Schools*, Massachusetts Educational Technology Advisory Council (2010): <http://www.doe.mass.edu/boe/sac/edtech/safety.pdf>
- *Updating our Acceptable Use Policy*, Boston Public Schools (2014): <http://www.bostonpublicschools.org/cms/lib07/MA01906464/Centricity/Domain/162/2014-06-04%20AcceptableUse%20presentation%20FINAL.pdf>

Sample checklists YSOs can use to inventory their Safe Environment capabilities are included in the Resources section and in Appendix 10.

Recommended Implementation/Decision making Model

STEP 1: Determine if the Minimum Physical and Procedural Standards for a Safe Environment are Present.

- Minimum physical standards include:
 - Facilities designed or adapted to ensure clear sight lines
 - All children and youth can be seen
 - Unused areas/rooms secured and locked
 - Off-limits areas clearly marked
 - All areas well lit
 - Safety rules and regulations posted
- Minimum procedural standards include rules and regulations for using the space:
 - Child/youth entry and release procedures (Check-in/sign-in/sign-out)
 - Visitor entry policy and expectations while in facility
 - “No closed-door” policy
 - Rules about 1-on-1 meetings
 - Adequate staff-to-child/youth ratios for supervision, and a clear understanding of which adults are responsible for which children and youth
 - Procedures for bathroom use, and changing and shower facilities (if applicable)
 - Code of Conduct for employees/volunteers/children/youth (see Code of Conduct section)

STEP 2: Determine what additional activities, circumstances, risks or regulatory/licensing or accreditation requirements pertain to the YSO.

- Are there additional requirements established by local, state and national organizations/agencies?
- What size and how dispersed are the physical space(s) occupied by the YSO?
- What kind of control does the YSO have over the design, maintenance, utilization of, and access to the physical space it occupies?
- Is transportation to/from the YSO and/or to/from YSO activities one of the services the YSO provides?
- Are overnight activities, trips, competitions, exhibitions, etc. conducted by the YSO?

- Are 1-on-1 interactions between staff/volunteers and youth (mentoring, tutoring, counseling, etc.) a normal part of the services provided?
- Do the ages and circumstances (intellectual/physical disabilities or other limitations) of the children/youth being served, and the risk of the activity require modification of the staff and volunteer to child/youth ratio? How and when?
- By what means will staff and volunteers be able to communicate with one another – especially in emergency situations – if they are not co-located
- Is electronic communication between staff/volunteers and children/youth prohibited/necessary/allowed and under what circumstances?

STEP 3: Select and utilize additional safe environment measures as needed

- Understand and implement additional statutory and/or regulatory requirements
- Additional staff will be required for supervision of multiple rooms, or space on multiple floors or in different buildings. A clear way to identify staff (badges, T-shirts, caps) and an efficient means for staff to communicate with one another (walkie talkies, etc.) are important for larger spaces.
- If it is necessary for vendors and other service providers to enter the premises, procedures for entry, identification, badging, monitoring and notification to all staff should be employed. Children/youth also need to know that work areas are off-limits.
- Larger spaces may require surveillance cameras and mirrors to monitor adequately, and the designation of a single (possibly monitored) entry point to minimize “wandering” through the building
- Spaces not owned by the YSO (and unable to be modified) or that are in buildings with public access, will need additional signage to steer children/youth away from areas that are off limits, accompaniment to toileting facilities (for younger children), and periodic security checks of any public spaces through which children/youth must pass.
- Mentoring and relationship-oriented programs that require 1-on-1 meetings off-site will require visiting/inspecting the mentor’s home and additional supervision and vigilance
- Off-site activities will require policies and procedures about the use of YSO transportation (ensure parental consent), additional screening of drivers (Also see section on Screening and Hiring), policies about the use of personal vehicles to transport children and youth or, alternately, reliance on parents and other caregivers to transport their children to and from the event.
- Overnight activities will require additional policies about room accommodations and sleeping arrangements, who is allowed in the rooms, who will check in on the children/youth and how often, etc.

- If necessary, the use of social media and electronic communication between YSO personnel and children/youth should be governed by a social media policy and outlined in the Code of Conduct (See sample policy in Appendix 9).⁴³
- It is important for YSO leaders to periodically (at least annually) update themselves and their staff on advances in social media technologies in order to evaluate and review how these safe environment protocols are working and whether/how they need to be revised in order to remain effective.

SECTION 5: Recognizing, Responding to, and Reporting Allegations and Suspicions of Child Sexual Abuse

Executive Summary

Although this report is focused on the prevention of child maltreatment and raising awareness among YSOs about the steps that can be taken to create and strengthen the youth serving environment to protect the children in their care, YSO personnel must also be ready to recognize child abuse when it occurs and to respond to it immediately, appropriately and effectively.

In the introduction to this report, the statistics for the various forms of child abuse and neglect in both the United States and in Massachusetts are presented in summary form. Given these numbers, it is certainly within the realm of possibility that no matter how large or small a YSO is, at least *some* of the children and youth participating in, or receiving services from its programs could have been, are, – or may be at risk to become – victims of sexual abuse and human trafficking (as a sexually exploited child)⁴⁴. This is not to say that every YSO in Massachusetts definitely has children or youth in these circumstances – only that it is possible. And if it is possible, then every administrator, manager, supervisor, employee and volunteer should be able to recognize what it looks like, how to respond to it, and how to get them the help they need to make it stop.

Affording the maximum protection for children and youth requires YSOs to increase staff and volunteer awareness about child abuse, to train them to recognize a child who may be in trouble, and to inform them about their responsibilities under the Massachusetts reporting laws and the policies and procedures of the YSO. Leadership must then support the staff in those responsibilities and actions by creating a culture where child safety and abuse prevention are a

⁴³ An online database of social media policies for various industries and organizations can be found at: <http://socialmediagovernance.com/policies/#axzz1t9QE04Ym>

⁴⁴ The term Human Trafficking is used by DCF as an umbrella term to include the two new (as of February 2016) allegations of abuse: Human Trafficking – Sexually Exploited Child, and Human Trafficking – Labor.

priority; where all staff and volunteers are encouraged to come forward; where concerns about behaviors can be expressed and discussed without fear; and where immediate and appropriate action is taken to respond to the child/youth, and to report the allegation, suspicion, or disclosure to the people and organizations responsible to respond.

In the Code of Conduct section above, the Task Force addressed the importance of establishing in writing the expected behaviors of staff and volunteers when supervising or interacting with children and youth. Further, the section emphasized training, education and ongoing conversations and supervision about defining and understanding the differences between appropriate, inappropriate and harmful behaviors, and establishing clear lines of communication, reporting, and the actions to be taken should any staff or volunteer witness an event, interaction or situation that falls outside of the boundaries of appropriateness. In this way, inappropriate behaviors or boundary violations with children and youth that were inadvertent or due to inexperience can be addressed through intervention, supervision, and monitoring – and corrected before they cross the line into harmful or abusive behaviors that must be reported.

Similarly, in the Introduction to this report, the symptoms – both behavioral and physical – that children and youth exhibit when being subjected to various types of physical, emotional and sexual maltreatment were outlined. For convenience, they are repeated in chart form below. The behavioral characteristics of the grooming process were also described to point out the warning signs that indicate an offender may be preparing a child or youth for eventual sexual contact. Again, if all staff and volunteers understand and conform to the Code of Conduct, it makes the behaviors of those who do not feel the rules apply to them easier to notice.

In addition to recognizing the symptoms of the various types of abuse, YSO staff may become aware that a child is being maltreated or abused because another child, or another adult points out the symptoms or otherwise indicates that a child is at risk. In still other circumstances, the child may self-disclose the alleged abuse – either directly to a YSO adult, or indirectly by describing the situation as happening to “a friend” and asking the adult for advice.

This section focuses on the situations where a staff member/volunteer in a YSO suspects or has evidence that a child or youth is a victim of abuse – particularly sexual abuse or human trafficking/sexually exploited child – and what the individual, his or her supervisors, and the YSO must do in response. It also explains the Massachusetts mandatory reporting laws, how to make a report to the Department of Children and Families (DCF), and DCF’s responsibilities and possible responses. The section also addresses more specifically the circumstances and resulting actions that should occur when the alleged abuse is being perpetrated by someone within the

YSO – either by an adult staff member or volunteer, or by another child/youth. Finally, the section addresses the emerging issue of child trafficking and some of its unique characteristics.

Minimum required elements for YSOs to prepare leadership, staff and volunteers to recognize, respond to, and report allegations, suspicions or disclosures of child abuse are presented below in Table 6, and an implementation and decision making model for how YSOs of various size can access and meet those requirements follows.

Table 6

Minimum Required Elements for Recognizing, Responding to, and Reporting Child Abuse

- All employees and volunteers:
 - Are aware of their legal/organizational obligations to immediately report suspected abuse.
 - Are trained to recognize the signs and symptoms of abuse.
 - Know how to respond to a child who discloses abuse.
 - Know how to report concerns, suspicions, allegations and disclosures of abuse.
- Clear, written procedures that provide step-by-step guidance on what to do if there are any concerns, allegations, suspicions or disclosures of abuse (current or historic)
- A designated person (agent)/group/office whose role it is to receive reports of suspected, observed or disclosed abuse.
- A clear reporting chain is identified that contacts (or assists reporters in contacting) DCF and/or law enforcement.
- Clear guidelines on conducting internal investigations when the alleged perpetrator is an employee or volunteer in the YSO.
 - Includes providing supervision and support to staff and volunteers following an incident or allegation, and a communication plan for parents/community.
- Information/training about the issues of child-on-child and youth-on-youth abuse and human trafficking (sexually exploited child).

Key Findings and Recommendations

- In addition to building a prevention structure that proactively works to protect children and youth from sexual abuse, YSOs must also work to prepare staff and volunteers to recognize, respond to, and report abuse that is alleged, suspected or disclosed.
- YSO staff and volunteers must be trained to recognize the signs and symptoms of abuse.
- Maximum protection for children and youth requires YSO leadership and staff to be familiar with the Massachusetts child abuse reporting laws, the offices and numbers to call, the timeframes involved, and the 51A reporting form.
- YSO Policies and Procedures and Codes of Conduct should include the state’s reporting requirements and clearly state that the YSO expects all staff and volunteers – mandated or not – to immediately report any suspicions, allegations, or disclosures of child abuse.
 - YSO leadership should identify an individual, a team, or department that will act as a designated agent to talk with staff about any concerns, receive reports of alleged abuse, and either make contact with DCF or assist the reporter in doing so.
 - YSOs need to “normalize” reporting as a requirement and support staff and volunteers in their responsibilities. Reporting chains must be clearly defined.
- All YSO employees and volunteers should know how to respond to a child/youth who discloses an abusive situation and YSO policies and procedures should have clear guidance on the steps to follow if this occurs. Guidance and sample flow charts are provided.
- Knowing what happens when a report is made to DCF and the legal protections for reporters can help “demystify” the process and reduce staff reluctance to come forward.
- Reports of alleged sexual abuse involving YSO staff, volunteers or even other YSO children/youth will require additional internal reporting structures, investigation (limited), notification to parents, and communication planning.
- The emerging area of child trafficking requires YSOs to be aware of the additional signs and symptoms of commercially exploited children, and the resources available should it be suspected.

Recommended Implementation and Decision Making Model

STEP 1 - RECOGNIZE: Determine and implement appropriate ways to inform YSO staff and volunteers about the signs and symptoms of child abuse and neglect, and make them aware of their responsibilities under Massachusetts law.

- Introduce to prospective staff and volunteers during the screening and hiring process that the YSO, in addition to providing its services, strives to provide those services in an

environment that is safe and that responds immediately to allegations, suspicions or disclosures of child abuse.

- Include in the YSO's Policies and Procedures and Code of Conduct the requirement for all staff and volunteers to report any allegations, suspicions or disclosures of child abuse.
- Use the information in this section on the Massachusetts definitions of child abuse, the Chart on Physical and Behavioral Indicators of Abuse/Child Trafficking (below), the DCF Reporting Brochure and the Sample Reporting Flow Chart in Appendix 10 as handouts to introduce the facts about child abuse and its symptoms.
 - Keep focus on answering the basics: "What is child abuse?" "How do I recognize it?" and "What am I supposed to do when I see it?"
- Depending on size and number of employees and volunteers, YSO leaders can consider conducting roundtable discussions, "brown-bag" lunches, in-service training or "professional days" on the topic of child/youth safety.
- Consider assigning online training modules to be completed; partnering with other YSOs already conducting training programs; or inviting DCF or other local social service agencies to conduct an on-site workshop or training (Also see Training section below).

STEP 2 - RESPOND: Determine the process by which the YSO will prepare staff and volunteers to respond to a child/youth who discloses abuse. Consider ways to encourage and support staff in coming forward to report child abuse that is suspected, observed, or disclosed.

- Teach staff and volunteers that the way a disclosure of child abuse is handled can affect the impact it has on the victim.
- Reproduce and use the Guidelines for Disclosures below to discuss the ways to respond to children and youth who disclose abuse so that they feel supported and believed.
- Ensure that whoever is talking with staff and volunteers about these topics is comfortable with the subject matter. These are not easy conversations to have, but they are critical – not taboo. The comfort of the presenter can affect the comfort of staff and volunteers.
- Maximize opportunities to talk with staff about child/youth protection issues and policies. Regular conversations will make it easier for staff to discuss behaviors, ask questions and approach situations from a prevention perspective.
- Ensure that staff knows that reporting suspected abuse (even if the reporter is unsure) affords protections for the reporter under Massachusetts law. The protection of the victim is the primary concern. Reluctance to come forward and report is often a result about concerns of personal liability.

STEP 3 - REPORT: Determine the YSO responses to allegations, suspicions and disclosures of child abuse committed by individuals outside the YSO, and by YSO staff or volunteers. Include the specific cases of suspected child-on-child or youth-on-youth abuse, and child trafficking.

- Staff must understand the steps to follow in making a report – and to whom the report must be made.
- In simplest form, a YSO can choose to designate a single person or “officer” to whom all reports are made. The designated reporter then assumes the responsibility (or helps the reporter) to contact the authorities, provide the required information, and follow up with the filing of the 51A Report Form (See Appendix 11).
- Ensure the reporting chain is clearly described. In smaller organizations, the reporting chain could be a single person. In larger organizations, the chain could include supervisors, managers, human resources, communications and legal staff.
- Provide forms that will make it easier for incidents to be recorded by staff and ensure the confidentiality and security of those records (see Sample Incident Report in Resources section).
- If the offender is a YSO staff member or volunteer, an additional internal reporting and investigation process will likely need to happen concurrent with the DCF response. This includes:
 - Interviewing the alleged offender and informing them of the allegations
 - Determining the employment status of the alleged offender
 - Coordinating with DCF the response to the victim and family
 - Notifying the rest of the staff and providing support
 - Assessing the conditions that allowed for the abuse to occur
 - Preparing a response to other parents, and to the media
- Make staff and volunteers aware that abuse can also take place between children or youth, and that children/youth also exhibit the symptoms of being sexually exploited or trafficked. In either case the process is the same – report to the designated reporter and contact DCF.
- These processes should be identified in the YSO’s policies and made clear to all staff and volunteers.

End of Executive Summary

Goal:

To respond quickly and appropriately to allegations, suspicions, observations or disclosures of child sexual abuse.

General Principles:

Organization leadership can help to build and maintain an environment in their YSO that is preventive and proactive in nature – that protects children either by preventing child abuse before it occurs, or by ensuring its detection at the earliest possible time. They can also help to ensure that all employees and volunteers understand the basic issues of child abuse and neglect; how to recognize its signs and symptoms; are familiar with Massachusetts law, policies and reporting procedures; and know the responsibilities of mandated reporters including how, when, and to whom to make a report. These will be covered first in this section, and will be followed by suggestions about how YSOs of various size can address these requirements, how to react to a child who discloses abuse, and the different circumstances YSO personnel may encounter that require reporting including child-on-child and youth-on-youth abuse.

The bottom line is that YSOs need to build and sustain an organizational mindset or *culture* such that if child maltreatment is suspected, observed, or disclosed to any member of the staff, that person will come forward with their concerns as quickly as possible, will know what to do to ensure the child’s safety and well-being, will communicate the situation promptly and effectively to the person(s) identified in the YSOs Code of Conduct and, if necessary, will know how to report the circumstances to the Department of Children and Families (DCF) or to the police. Early reporting is critical and is the key to preventing further harm.

Massachusetts Law

Mandated reporters are required to immediately report suspicions of child abuse and neglect to the Department of Children and Families (DCF) by phone, followed by a written report (called a 51A) within 48 hours, when in their professional capacity they have “reasonable cause to believe that a child is suffering physical or emotional injury resulting from: (i) abuse inflicted upon him which causes harm or substantial risk of harm to the child’s health or welfare, including sexual abuse; (ii) neglect, including malnutrition; (iii) physical dependence upon an addictive drug at birth, or (iv) being a sexually exploited child; or (v) being a human trafficking victim⁴⁵ as defined by section 20M of chapter 233” (Mass. General Laws⁴⁶).

The law states further that “If a mandated reporter is a member of the staff of a medical or other public or private institution, school or facility, the mandated reporter may instead notify the person or designated agent in charge of such institution, school or facility who shall become responsible for notifying the department in the manner required by this section. A mandated reporter may, in addition to filing a report under this section, contact local law enforcement

⁴⁵ Note that for DCF purposes, the term Human Trafficking is used as an umbrella term to include the two new (Feb 2016) allegations of abuse: Human Trafficking – Sexually Exploited Child, and Human Trafficking – Labor. The language above is the MGL definition.

⁴⁶ <https://malegislature.gov/Laws/GeneralLaws/PartI/TitleXVII/Chapter119/Section51A>

authorities or the child advocate about the suspected abuse or neglect.” Mandated reporters who fail to report can be punished by fines of up to \$1,000.

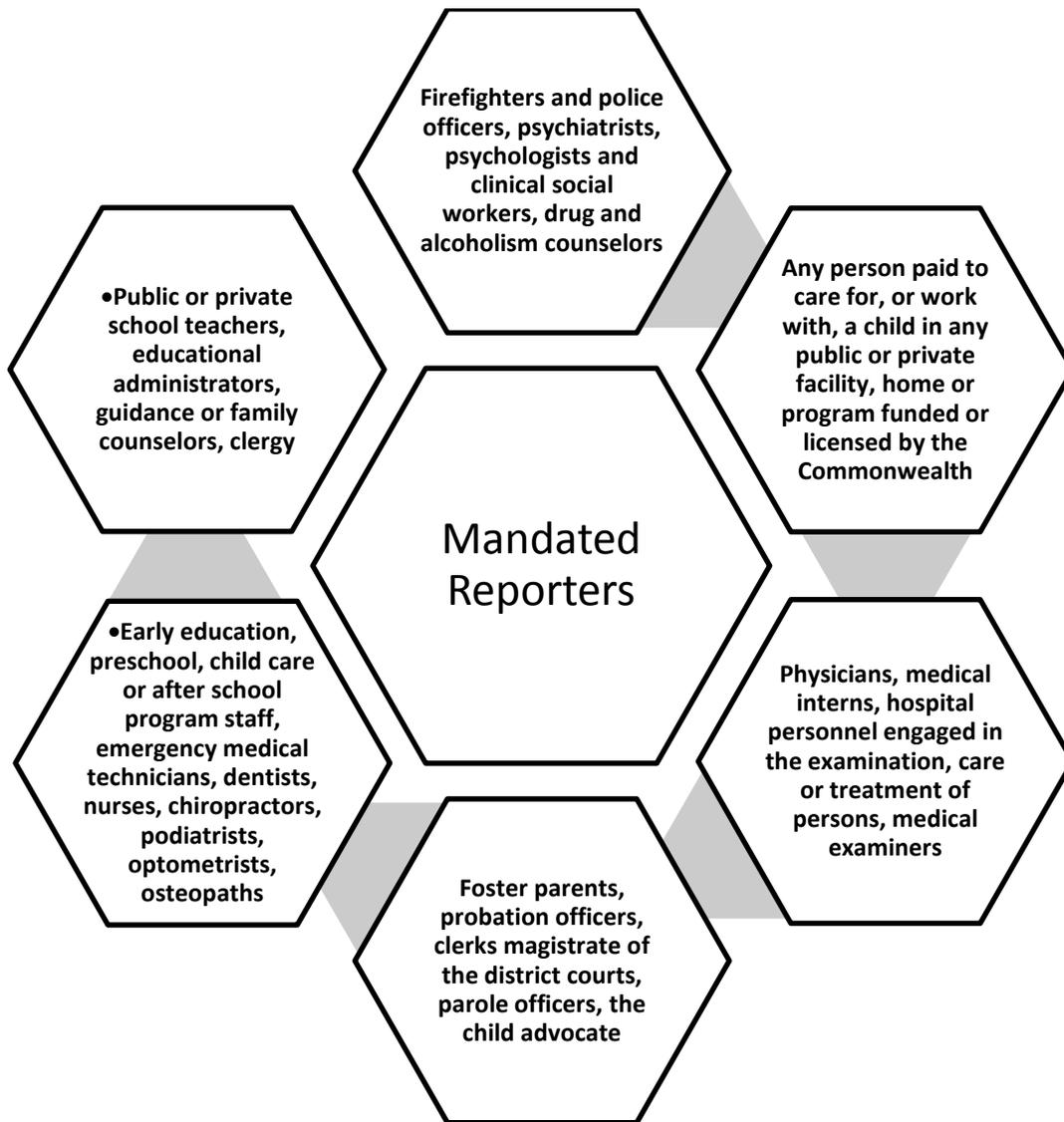
It is important to note that the language above requires the reporting of *suspected* abuse to DCF. No state, including Massachusetts, requires the reporter to have conclusive *proof* that the abuse or neglect occurred before reporting. Reporters are not expected to be investigators. The law clearly specifies that reports must be made when abuse is observed, or the reporter “*suspects*” or “*has reasonable cause to believe*” that a child has been or is being harmed. Asking the child too many questions, or for greater detail in order to feel more confident before filing a report may confuse or re-traumatize the child, convey a sense to the child that they are not believed, or – in the worst case – cause the child to stop talking altogether. The job of investigation should be left to the professionals at DCF and law enforcement who are trained in interviewing children and youth who have been victims of trauma. In all cases the intent is clear: incidents are to be reported as soon as they are noticed or suspected. The benefit of the doubt is always given to the suspected victim. Waiting for conclusive proof may put the child or youth at further risk.

Mandated reporters are also protected under the law. If the report is made in good faith, mandated reporters are protected from liability in any civil or criminal action and from any discriminatory or retaliatory actions by an employer – even if the report is deemed unfounded after investigation. The name of the reporter is not disclosed by DCF to the parents/guardians of a child who is the subject of the report.

Who are Mandated Reporters?

Massachusetts law defines a number of professionals as mandated reporters (for the full list see MGL Chapter 119, Section 51A):

Massachusetts Mandated Reporters



Note that the list of mandated reporters above identifies professionals and other paid staff employed by certain organizations in a variety of roles. **However, there is nothing in the law that prevents anyone from making a report.** Thus, while acknowledging the role of *statutory* mandated reporters in their policies and procedures, YSOs – even those who do not employ mandated reporters – should express the expectation in their policies that *all* staff who interact directly with children and youth (including volunteers and other non-mandated reporters) are required to report any suspected child abuse or neglect, or any situations involving inappropriate

activity with a child/youth, and will be trained in the procedures to do so. There is more detail on training structures and programs in the Training section below.

Further, it is recommended that YSO Codes of Conduct should include the requirement for all staff and volunteers to follow the reporting laws of the Commonwealth and the organization, and declare by means of their signature that they understand the penalties for failing to do so – up to and including dismissal. Non-mandated reporters are accorded the same protections under the law as mandated reporters⁴⁷ (see Policies and Procedures, Code of Conduct, and Training sections in this report).

Recognizing Abuse and Neglect

What are the signs and symptoms of abuse and neglect?

The definitions in Massachusetts law of the various types of child maltreatment, and the physical and behavioral signs that indicate a child/youth may be suffering from abuse have been defined above (see Introduction). But it is important to note here that child abuse, especially child sexual abuse, is rarely observed directly. There are usually three ways in which a potential reporter might recognize that a child is being abused:

- The child/youth demonstrates certain physical or behavioral symptoms;
- Another child, youth or adult indicates that a child/youth is at risk; or
- A child/youth self-discloses the abuse

In the absence of direct disclosure by the child or youth, or communication from another person that a child/youth is at risk, one must rely on the signs and symptoms that children and youth exhibit when they are victims of abuse and neglect. Although these have been discussed in the Introduction above, they are summarized here in chart form for re-emphasis and convenience:

⁴⁷ Non-mandated reporters may also report suspected abuse anonymously if they choose. Mandated reporters must identify themselves.

Physical and Behavioral Indicators of Abuse⁴⁸

Type of Abuse	Physical Indicators	Behavioral Indicators
Physical Abuse	<ul style="list-style-type: none"> • Unexplained bruises (in various stages of healing) • Unexplained burns, especially cigarette burns or immersion burns • Unexplained fractures, lacerations or abrasions • Swollen areas • Evidence of delayed or inappropriate treatment for injuries 	<ul style="list-style-type: none"> • Self destructive • Withdrawn and/or aggressive - behavioral extremes • Arrives at school early or stays late as if afraid to be at home • Chronic runaway (adolescents) • Complains of soreness or moves uncomfortably • Wears clothing inappropriate to weather, to cover body • Bizarre explanation of injuries • Wary of adult contact
Neglect	<ul style="list-style-type: none"> • Abandonment • Unattended medical needs • Consistent lack of supervision • Consistent hunger, inappropriate dress, poor hygiene • Lice, distended stomach, emaciated • Inadequate nutrition 	<ul style="list-style-type: none"> • Regularly displays fatigue or listlessness, falls asleep in class • Steals food, begs from classmates • Reports that no caretaker is at home • Frequently absent or tardy • Self destructive • School dropout (adolescents) • Extreme loneliness and need for affection
Sexual Abuse	<p>Sexual abuse may be non-touching: obscene language, pornography, exposure - or touching: fondling, molesting, oral sex, intercourse</p> <ul style="list-style-type: none"> • Torn, stained or bloody underclothing • Pain, swelling or itching in genital area • Difficulty walking or sitting • Bruises or bleeding in genital area • Venereal disease • Frequent urinary or yeast infections 	<ul style="list-style-type: none"> • Excessive seductiveness • Role reversal, overly concerned for siblings • Massive weight change • Suicide attempts (especially adolescents) • Inappropriate sex play or premature understanding of sex • Threatened by physical contact, closeness
Emotional Abuse	<p>Emotional abuse may be name-calling, insults, put-downs, etc., or it may be terrorization, isolation, humiliation, rejection, corruption, ignoring</p> <ul style="list-style-type: none"> • Speech disorders • Delayed physical development • Substance abuse • Ulcers, asthma, severe allergies 	<ul style="list-style-type: none"> • Habit disorder (sucking, rocking, biting) • Antisocial, destructive • Neurotic traits (sleep disorders, inhibition of play) • Passive and aggressive - behavioral extremes • Delinquent behavior (especially adolescents) • Developmentally delayed

⁴⁸ From the Handbook on Child Safety for Independent School Leaders, by A. Rizzuto and C. Crosson-Tower, Copyright 2012, Reprinted with permission from the National Association of Independent Schools.

What to Do

In General:

With some exceptions, a single incident or observation of any of the above may not necessarily trigger the need for a call to DCF. However, if an indicator is observed, and a decision is made not to contact DCF, it should be a red flag to maintain a watchful eye on the child or youth, confer with fellow staff or supervisors as to whether they have noticed similar physical and/or behavioral symptoms, and keep notes about the behaviors that are causing concern. Certainly, if a pattern emerges, or the symptom becomes more pronounced or severe, a call to DCF must be made.

Most people have never filed a report with DCF, and many people – especially non-professionals – who work or volunteer with children or youth may feel a certain reluctance to do so. Questions about personal liability, being sued, causing trouble to another family or to their employer, mistrust of the authorities like DCF, not knowing exactly what will happen after a report is made, or just the possibility of being wrong may be enough for someone to start “second-guessing” the situation or their own observations and reactions and remain silent. YSO leaders need to take steps to address this reluctance by “demystifying” the reporting process, by showing staff and volunteers that they will be supported in their efforts to keep children and youth safe, and that there will be no negative consequences or repercussions for reporting – even if the report turns out to be wrong.

In addition to the institutions mentioned specifically in the 51A law, any YSO may identify a “designated agent” or individual to receive reports of suspected abuse from staff and volunteers. In this way, staff who believe they have information or observations that indicate a child or youth is at risk have someone to speak with and, as a result, can feel less isolated and vulnerable. In small, single proprietor YSOs with a limited number of employees, owners can designate themselves as the person to whom all reports or suspicions should be communicated. In larger organizations, it could be a supervisor, or the head of a department, the principal of a school, a guidance counselor or even a small multidisciplinary team.

NOTE: It may happen that the designated agent does not agree with the reporter that the situation being brought forward warrants a call to DCF. The fact that this may happen should not prevent a reporter – especially a mandated reporter – from contacting DCF directly if he or she remains convinced, and has reasonable cause to believe that the suspected abuse or neglect did occur. The YSO should also make it clear that it will not discharge or in any manner retaliate or discriminate against any person who, in good faith, submits a report of child abuse or neglect to DCF.

However, the individual or team identified as the designated agent or reporter should be familiar with the local DCF office, with the procedures that need to be followed to make a report, and with what happens once a report is filed. In this way, the person or group “teams” with the reporter, knows what DCF will be looking for in terms of information, knows whom to contact and ask questions, and provides an informed “sounding board” that can help the reporter and YSO take the next steps to protect the child or youth.

To increase awareness among staff and volunteers, YSOs can maintain in abbreviated form, as an appendix to their Policies and Procedures, or as an attachment to their Code of Conduct, instructional materials about child abuse (e.g., the chart above on physical and behavioral indicators) and a 1-page flow chart of the sequence to follow, the people to contact and the numbers to call if abuse is suspected, observed or disclosed (See sample chart in Appendix 11). YSO leaders can use these materials as part of the orientation process for new hires or volunteers, and include them in annual training or professional development efforts.

Larger organizations may also develop or purchase commercially available onsite and online training programs tailored to their specific environments. In some cases, insurers have developed child abuse prevention and reporting education programs as part of their client risk mitigation programs. There is also a publicly available training resource for mandated reporters offered by the Middlesex District Attorney’s Office at <http://51a.middlesexcac.org>. Abuse prevention training programs – including personal safety training programs for children and youth – will be discussed in more detail in the Training section below.

Since the vast majority of abuse cases – including incidents of sexual abuse – take place at the hands of someone a child/youth knows and trusts, most of the situations that will come to the attention of YSO personnel will likely be situations occurring outside of the YSO – in the home, or within the extended family, or the family’s social network. In other cases, however, the allegation may concern a current or past employee or volunteer of the YSO or even another child or youth attending a YSO program. In the latter two instances, additional guidance will need to be drafted that includes the process of internal investigation, notification to parents and a plan for public communication and response. These will be addressed in more detail below.

Responding to a Direct Disclosure

Sometimes, a child or youth might self-disclose an abusive situation to an adult in the organization. These disclosures can be direct, where the child or youth self-identifies as the victim, or more indirect where the child/youth describes the situation as though it is happening to someone else and is asking for advice about helping the “friend”.

Faced with an abuse disclosure by a child or youth, anyone might feel at a loss as to what to say. First, it is vital to communicate several things to them: that you are very glad that they told you, that you believe them, and that they are not to blame. Whether or not you believe the story that the child/youth has told, they have told you for a reason. Until you know why, the child/youth must feel believed (the number of false reports by children/youth are negligible). Research indicates that the adult response to a child's/youth's disclosure can have an impact on their recovery. It may also help the child if you communicate that this happens to other children, and they are not alone. Of course, a direct disclosure from a child/youth requires an immediate report to DCF and/or to law enforcement or the child advocate. The following are some additional tips that will be important in talking with the child:

Guidelines for disclosures

- Do not let the child/youth swear you to secrecy before telling you something. You may need to report.
- If a child/youth asks to speak with you, try to find a neutral setting where you can have quiet and few interruptions.
- Do not lead the child/youth in telling their story. Just listen, and let them explain what happened in their own words. Do not pressure them for a great amount of detail.
- Respond calmly and matter-of-factly. Even if the story is difficult to hear, it is important not to register disgust or alarm.
- Avoid making judgmental comments about the abuser. It is often someone the child or youth loves or with whom they are close.
- Children/youth often feel (or are told) that they are to blame for their own maltreatment and for bringing "trouble" to the family; therefore, it is important to reassure children and youth that they are not at fault.
- Do not make promises to the child/youth that things will immediately get better. In reality, things may get worse before they get better, but conveying this to the child or youth may cause greater anxiety.
- Do not confront the abuser. This may cause more harm to the child/youth.
- Ask the child/youth if they feel safe going home. If they do not, or if you believe that it isn't safe for the child/youth to return home, this should be considered an emergency and handled immediately by contacting DCF and/or the local police department. Do not take the situation into your own hands. Provisions for the child's/youth's safety should be made by an appropriate agency.
- Respect the child's/youth's confidence and limit the number of people with whom you share the information. The child's/youth's privacy should be protected.

- Explain to the child/youth that you must tell someone else in order to get some help. Try to let the child/youth know that someone else may also need to talk with them and explain why.
- Assure the child/youth that you or another staff member will be available for support whenever possible.⁴⁹

Remember that children and youth who disclose are often frightened or anxious and will need reassurance, encouragement, and support throughout the weeks to come. DCF staff can help guide everyone concerned about how they might provide this support.

Should the child's parents be notified about the intention to report?

The issue of how and when to involve parents, especially if it is the parents who are suspected of the abuse or neglect, is always difficult. If the family is told before DCF gets involved, it is always possible that the child could be further harmed before any protection is in place. Although families will sometimes remove children from the organization or flee the area, professionals argue that a family who is told that a report is being made can also be helped to recognize that reporting is a helping rather than a punitive gesture. If the YSO has a good relationship with the family, this is especially true. However, it is characteristic of abusive and neglectful families to isolate themselves and that makes it more difficult to predict how they will react to a report to the authorities. When in doubt, it would be best to call DCF and ask for their direction. The bottom line is that the immediate protection of the child or youth must always be the primary concern.

Reporting suspected child abuse

When YSO staff suspect that a child is being abused and/or neglected, they are required to immediately telephone the local DCF Area Office and ask for the Screening Unit. A directory of the DCF Area Offices and a copy of the 51A report form, can be found in Appendix 11 (below) and on the DCF web site.⁵⁰ Offices are staffed between 9 am and 5 pm weekdays. To make a report at any other time, including after 5 pm and on weekends and holidays, call the Child-At-Risk Hotline at 800-792-5200. Reporters are also required by law to mail or fax a written report to DCF within 48 hours after making the oral report.

⁴⁹ Crosson-Tower, C. (2003). *The Role of Educators in Preventing and Responding to Child Abuse and Neglect*. Washington, DC: U.S. Department of Health and Human Services.

⁵⁰ <http://www.mass.gov/eohhs/gov/departments/DCF/contact-us/dss-directory.html>

Significant updates to the DCF intake and response process were initiated in November 2015, and a new Protective Intake Policy was implemented in March 2016. The new Protective Intake Policy is divided into two phases: (1) the screening of all reports; and (2) a response to any report that is screened in. As a result of these changes, all screened in reports are now investigated, response times for investigation have been shortened, and both staff and case supervision requirements have been expanded. The 51A Report Form has also been revised and updated. A detailed description of what happens when a report is made to DCF, and a description of the investigative process, its timelines, and a step-by-step chart appear below in Appendix 11.

When the call is made, and when filling out the 51A, the reporter should be prepared to provide the following information if known (From: DCF Protective Intake Policy, 2/28/16 and Mandated Reporter's Guide <http://www.mass.gov/eohhs/gov/departments/dcf/child-abuse-neglect/reporting-abuse.htm>):

- Your name, address and telephone number, and your relationship (if any) to the child(ren)/youth.
- All identifying information you have about the child/youth and parent or other caregiver, and information about other children/youth in the household if known.
- The nature and extent of the suspected abuse and/or neglect, and/or human trafficking/sexual exploitation, including any evidence or knowledge of prior injury, abuse, maltreatment, or neglect.
- The identity of the person(s) you believe is/are responsible for the abuse and/or neglect.
- The circumstances under which you first became aware of the child's/youth's injuries, abuse, maltreatment or neglect, and/or human trafficking/sexual exploitation.
- What action, if any, has been taken thus far to treat, shelter, or otherwise assist the child(ren)/youth.
- The child's/youth's visibility within the community (e.g., child care, school attendance. etc.).
- Emergency contact information for the children/youth being reported, and languages spoken in the household.
- Any concerns about alcohol, drug use, misuse by the parent/caregiver.
- Any other information you believe might be helpful in establishing the cause of the injury and/or person(s) responsible, any concerns you have for social worker safety.
- Any information that could be helpful to DCF staff in making safe contact with an adult victim in situations of domestic violence (e.g., work schedules, place of employment, daily routines).

- Any other information you believe would be helpful in ensuring the child's/youth's safety and/or supporting the family to address the abuse and/or neglect concerns (other contributing or high risk factors, the family's strengths and capacities, etc.).

NOTE: IF YOU DO NOT HAVE ALL THIS INFORMATION, DO NOT LET THIS KEEP YOU FROM FILING. FILE WITH WHAT INFORMATION YOU DO HAVE AND LET THE PROFESSIONALS MAKE THEIR DETERMINATIONS.

What if the abuse is being perpetrated by someone within the organization?

It is extremely disturbing for most adults to consider that a colleague or co-worker might be abusing children – but it happens. In these cases, however, children need special protection. A common response when a fellow employee or volunteer is suspected of abuse, especially if the person is popular or has been part of the organization for a long period of time, is to deny, rationalize, or ignore it. Sometimes the alleged abuser is transferred to another organizational location, is allowed to resign, or is fired. But experience has shown that, even with a suspension, reprimand or transfer, the violation is likely to recur in the absence of intervention and monitoring.

Again, Codes of Conduct exist to clearly identify a range of expected and prohibited behaviors for all adults who interact with children and youth. If an employee or volunteer is behaving in a way that causes concern, it would be important for the observer to be able to distinguish violations of the Code that require a report to law enforcement or DCF, from those that may be handled organizationally (e.g., are correctable by supervisors or managers). Employees and volunteers – even those who are not mandated reporters – should be required to address or report any behaviors and practices that may be inappropriate or harmful. Inappropriate behaviors or minor violations of the Code can sometimes be addressed by a fellow employee who brings the violation to the attention of the offending co-worker in order to remind him or her of the rules. If the behaviors persist, however, reporting them to a supervisor or manager for correction would be more appropriate. If the behavior is more serious and raises suspicion that a child or youth is about to be, or is being abused, a report to DCF must be made.

If a child/youth reports being sexually, physically, or emotionally abused by someone in the organization, we should remember that it takes courage for an abused child or youth to talk to someone. After using the guidance above to talk with them, the best course of action for the YSO

is to immediately report the disclosure to DCF. DCF personnel then interview the child/youth or refer the allegations to law enforcement (depending on the situation) to determine the veracity of the allegation, and if the child or youth knows anyone else to whom this has happened. If so, the DCF investigator will likely wish to talk with any other alleged victims.

In the situations where DCF is contacted and begins its investigation, there will also likely be an organizational reporting chain to be notified. Depending on the size of the organization, this internal chain could include human resources, supervisors, organization leadership, the risk management and communications office and the general counsel – possibly even the Board of Trustees. Their tasks might include interviewing and notifying the alleged offender of the allegations, determining whether the alleged offender should be placed on leave (with or without pay) or fired, notifying the rest of the staff, communicating with parents, press releases to notify the general public, determining whether it is safe for the child/youth to continue to utilize the YSO while the DCF investigation is ongoing, and the level of organizational support to the alleged victim and family. Additionally, their task may be to assess the internal conditions or situations that may have allowed the alleged abuse to take place: Were the safety policies and procedures and code of conduct clear enough? Were screening and hiring procedures followed? Was training adequate or inadequate? Were monitoring activities and internal supervisory procedures being followed? When the situation was noticed, how was it addressed?

While this internal process is taking place, it should not interfere in any way with the investigation by DCF or law enforcement. The child or youth should not be interviewed by the internal team. It is also inappropriate to ask victims to tell their stories in front of the alleged abuser. There is a significant difference in power and resources between adults and children/youth, and asking them to relate their story in front of the alleged perpetrator can further victimize them. The best thing for organizations in a situation like this is to cooperate with the investigators and to stay out of their way until the DCF investigative process is completed and the allegations are substantiated or not.

What if the abuse is being perpetrated by another child or youth?

Nationally, it is reported that over one third of reported cases of child sexual abuse are committed by individuals who are under the age of 18 themselves.⁵¹ This can be a difficult issue to address, partly because of the challenge it presents to think of children or youth as capable of

⁵¹ Snyder, H. N. (2000). Sexual assault of young children as reported to law enforcement: Victim, incident, and offender characteristics. Washington, DC: US Department of Justice, Office of Justice Programs, Bureau of Justice Statistics.

sexually abusing other children or youth. In addition, it's not always easy to tell the difference between normal sexual curiosity and behaviors that are potentially abusive.

First, it is important to distinguish between age appropriate and age inappropriate sexual behaviors. Many children engage in sexual behaviors and show sexual interests throughout their childhood years, even though they have not yet reached puberty. However, normal (or expected) sexual behaviors are usually not overtly sexual, occur between children of about the same age and size, are more exploratory and playful in nature rather than planned, do not show a preoccupation with sexual interactions, and are not hostile, aggressive, or hurtful to the child or to others.

However, these behaviors of childhood and adolescence are of concern when they are extensive or suggest preoccupation, or involve others in ways that are not consensual. That is, sexual behaviors in children present a special concern when they appear as prominent features in a child's or youth's life, where there are larger differences in the children's/youths' ages and size, when manipulation or bribery are employed, or when sexual play or behaviors are not welcomed by other children/youth involved in the play. This is the point where "play" crosses the line into sexually harmful and aggressive behaviors.

Often, the types of behaviors that "cross the line" can be warning signs that a child or youth has been exposed to, or had contact with, inappropriate sexual activities or material and is reacting to the experience – particularly if the child/youth expresses or demonstrates knowledge of sexual activity that is normally beyond the understanding of others of similar age. Some may have witnessed physical or sexual violence at home and are acting on what they have seen. Some may have been exposed to sexually explicit movies, video games, or other pornographic materials. In other instances, a child or youth may act on a passing impulse with no harmful intent, but may still cause harm to other children/youth. It is always important to seek help promptly in instances of suspected or observed abuse between children and/or youth.

If a staff member or volunteer in a YSO suspects, observes or receives a disclosure about sexual or sexually abusive activity between children and/or youth, DCF should be contacted and a report filed. In most cases, since the children involved are not in a caregiver role, DCF will not be the primary agency providing services, and will screen the case out, but will act as a referral source to the District Attorneys and the courts who will try to coordinate assessment and treatment services with local Child Advocacy Centers and other providers. Child-on-child or youth-on-youth sexual abuse involves minors who are victims and minors with sexual behavior problems who may also be victims themselves. Children and youth who are abused by another child or youth need help to recover from the trauma, and children or youth who abuse other

children need specialized help and support to stop the behavior. Sexual contact between older youth (adolescents) who are close in age carries the additional complexity of appearing “consensual” but nonetheless needs to be addressed.

Massachusetts laws in this area can be confusing, but are evolving and being discussed at senior governmental levels. In most cases, the desired intervention for minors who sexually abuse other minors is focused on treatment rather than criminal investigation and punishment. Unlike adult offenders, if caught and stopped early, studies report that from 85 to 95% of offending youth never re-offend.^{52,53} Thus, early intervention and treatment from a multidisciplinary perspective can be major factors in preventing sexually abusive behavior into adulthood. Only the most serious cases – depending on the age of the child or adolescent who perpetrated the abuse – may result in legal consequences through the juvenile justice and family court systems.

Sexual activity between children/youth can be prevented in many of the same ways sexual activity between adults and children/youth is addressed. YSOs must prevent situations where children and youth are alone and unsupervised, both onsite and offsite, and ensure that staff and volunteers are trained in the warning signs and symptoms of sexual abuse. As always, vigilance is key, and staff must be even more vigilant during times when children and youth have been shown to be more vulnerable to abuse: non-structured program time, free time between activities, shower time, trips to the restroom, and changing for the pool or other sporting event, etc. No matter where children or youth are, they must always be there with the knowledge of staff – and always under either staff supervision or observation.

Human trafficking and the sexually exploited child/youth

The term Human Trafficking is used by DCF as an umbrella term to include the two newly recognized (as of February 2016) allegations of abuse: Human Trafficking – Sexually Exploited Child, and Human Trafficking – Labor.

Victims of human trafficking in the United States include children and youth, both girls and boys, involved in the sex trade who are coerced or deceived into commercial sex acts, and children and youth forced into different forms of labor or services, for example, as domestic

⁵² Przybylski, R. “Effectiveness of Treatment for Juveniles Who Sexually Offend”, Office of Justice Programs (OJP), Sex Offender Management Assessment and Planning Initiative. (https://www.smart.gov/SOMAPI/sec2/ch5_treatment.html)

⁵³ Righthand, S. and Welch, C. (2001) Juveniles Who Have Sexually Offended: “A Review of the Professional Literature. Office of Juvenile Justice and Delinquency Prevention.” (<https://www.ncjrs.gov/pdffiles1/ojjdp/184739.pdf>)

workers held in a home, or farm-workers forced to labor in exchange for shelter or threats of deportation.

It has been estimated that between 14,500 and 17,500 people are trafficked into the U.S. from around the world each year.⁵⁴ In terms of human trafficking of U.S. citizens within the United States, approximately 244,000 American children and youth are estimated to be at risk of child sexual exploitation, including commercial sexual exploitation.⁵⁵ The National Center for Missing and Exploited Children estimates that there are 100,000 youths under the age of 18 *already* in the commercial sex trade in the U.S.⁵⁶ Examples include the commercial sexual exploitation of boys and girls on the streets or in a private residence, club, hotel, spa, or massage parlor; online commercial sexual exploitation; exotic dancing/stripping; agricultural, factory, or meatpacking work; construction; domestic labor in a home; restaurant/bar work; illegal drug trade; door-to-door sales, street peddling, or begging; or hair, nail, and beauty salons. Traffickers may target minor victims through social media websites, telephone chat-lines, after-school programs, at shopping malls and bus depots, in clubs, or through friends or acquaintances.

As with child abuse and neglect, there are certain signs and vulnerabilities that children and youth exhibit when they are victims of human trafficking:⁵⁷

- History of emotional, sexual, or other physical abuse. Children and youth with such a background could fall prey to this form of victimization again;
- History of running away or current status as a runaway. Traffickers know runaways are in a vulnerable situation and target places such as shelters, malls, or bus stations frequented by such children and youth;
- Signs of current physical abuse and/or sexually transmitted diseases. Such signs are indicators of victimization, potentially sex trafficking;
- Inexplicable appearance of expensive gifts, clothing, or other costly items. Traffickers often buy gifts for their victims as a way to build a relationship and earn trust;
- Presence of an older boy- or girlfriend. While they may seem “cool,” older boyfriends are not always the caring men they appear to be;
- Drug addiction. Pimps frequently use drugs to lure and control their victims;

⁵⁴ U.S. Department of Justice, Report to Congress from Attorney General John Ashcroft on U.S. Government Efforts to Combat Trafficking in Persons in Fiscal Year 2003: 2004

⁵⁵ Estes, Richard J. and Neil A. Weiner. *The Commercial Sexual Exploitation of Children in the U.S., Canada, and Mexico*. The University of Pennsylvania School of Social Work: 2001. Study funded by the Department of Justice.

⁵⁶ Polaris Project Fact Sheet (2014) (www.polarisproject.org/take-action/365-days).

⁵⁷ National Center for Missing and Exploited Children (2010). *The Prostitution of Children in America: A Guide for Parents and Guardians*.

- Withdrawal or lack of interest in previous activities. Due to depression or being forced to spend time with their pimp, victims lose control of their personal lives, and;
- Gang involvement, especially among girls. Girls who are involved in gang activity can be forced into prostitution.

Children or youth who may be at risk of, or who are victims of human trafficking may also show signs of shame or disorientation; demonstrate an inability to attend school on a regular basis and/or have unexplained absences; make references to frequent travel to other cities; exhibit anxiety, or fear; lack control over their schedule and/or identification or travel documents; are hungry, malnourished, deprived of sleep, or inappropriately dressed (based on weather conditions or surroundings); and have coached or rehearsed responses to questions.⁵⁸ Children who exhibit these physical and behavioral symptoms must be brought to the immediate attention of DCF as this form of abuse, even though not generally committed by a caregiver, requires mandatory reporting.

Recommended Implementation and Decision Making Model

STEP 1 - *RECOGNIZE*: Determine and implement appropriate ways to inform YSO staff and volunteers about the signs and symptoms of child abuse and neglect, and make them aware of their responsibilities under Massachusetts law.

- Introduce to prospective staff and volunteers during the screening and hiring process that the YSO, in addition to providing its services, strives to provide those services in an environment that is safe and that responds immediately to allegations, suspicions or disclosures of child abuse.
- Include in the YSO's Policies and Procedures and Code of Conduct the requirement for all staff and volunteers to report any allegations, suspicions or disclosures of child abuse.
- Use the information in this section on the Massachusetts definitions of child abuse, the Chart on Physical and Behavioral Indicators of Abuse/Child Trafficking (below), the DCF Reporting Brochure and the Sample Reporting Flow Chart in Appendix 11 as handouts to introduce the facts about child abuse and its symptoms.
 - Keep focus on answering the basics: "What is child abuse?" "How do I recognize it?" and "What am I supposed to do when I see it?"
- Depending on size and number of employees and volunteers, YSO leaders can consider conducting roundtable discussions, "brown-bag" lunches, in-service training or "professional days" on the topic of child and youth safety.

⁵⁸ U.S. Department of Education, Office of Elementary and Secondary Education, Office of Safe and Healthy Students, Fact Sheet (2013) Human Trafficking of Children in the United States. (www2.ed.gov/about/offices/list/oese/oshs/factsheet.html).

- Consider assigning on-line training modules to be completed; partnering with other YSOs already conducting training programs; or inviting DCF or other local social service agencies to conduct an on-site workshop or training (Also see Training section below).

STEP 2 - RESPOND: Determine the process by which the YSO will prepare staff and volunteers to respond to a child/youth who discloses abuse. Consider ways to encourage and support staff in coming forward to report child abuse that is suspected, observed, or disclosed.

- Teach staff and volunteers that the way a disclosure of child abuse is handled can affect the impact it has on the victim.
- Reproduce and use the Guidelines for Disclosures below to discuss the ways to respond to children and youth who disclose abuse so that they feel supported and believed.
- Ensure that whoever is talking with staff and volunteers about these topics is comfortable with the subject matter. These are not easy conversations to have, but they are critical – not taboo. The comfort of the presenter can affect the comfort of staff and volunteers.
- Maximize opportunities to talk with staff about child and youth protection issues and policies. Regular conversations will make it easier for staff to discuss behaviors, ask questions and approach situations from a prevention perspective.
- Ensure that staff knows that reporting suspected abuse (even if the reporter is unsure) affords protections for the reporter under Massachusetts law. The protection of the child/youth is the primary concern. Reluctance to come forward and report is often a result about concerns of personal liability.

STEP 3 - REPORT: Determine the YSO responses to allegations, suspicions and disclosures of child abuse committed by individuals outside the YSO, and by YSO staff or volunteers. Include the specific cases of suspected child-on-child or youth-on-youth abuse, and child trafficking.

- Staff must understand the steps to follow in making a report – and to whom the report must be made.
- In simplest form, a YSO can choose to designate a single person or “officer” to whom all reports are made. The designated reporter then assumes the responsibility (or helps the reporter) to contact the authorities, provide the required information, and follow up with the filing of the 51A Report Form (See Appendix 11).
- Ensure the reporting chain is clearly described. In smaller organizations, the reporting chain could be a single person. In larger organizations, the chain could include supervisors, managers, human resources and legal staff.
- Provide forms that will make it easier for incidents to be recorded by staff and ensure the confidentiality and security of those records.

- If the offender is a YSO staff member or volunteer, an additional internal reporting and investigation process will likely need to happen concurrent with the DCF response. This includes:
 - Interviewing the alleged offender and informing them of the allegations
 - Determining the employment status of the alleged offender
 - Coordinating with DCF the response to the victim and family
 - Notifying the rest of the staff and providing support
 - Assessing the conditions that allowed for the abuse to occur
 - Preparing a response to other parents, and to the media
- Make staff and volunteers aware that abuse can also take place between children or youth, and that children/youth also exhibit the symptoms of being sexually exploited or trafficked. In either case the process is the same – report to the designated reporter and contact DCF.
- These processes should be identified in the YSO’s policies and made clear to all staff and volunteers.

SECTION 6: Training About Child Sexual Abuse Prevention

Executive Summary

Creating a set of abuse prevention policies and procedures, enhanced screening and hiring practices, safe physical environment and safe technology standards, codes of conduct, and responding and reporting requirements are all necessary steps that help YSOs create comprehensive frameworks to protect the children and youth they serve. But creating these safety elements and handing them out to managers, supervisors, employees and volunteers while announcing that they are in effect is, by itself, inadequate as an implementation strategy. That is why the Task Force recommends that YSOs also provide some form of initial and periodic follow-up training on the organization’s prevention strategies for staff and volunteers (and, for some, this also includes children/youth) at all levels. This section addresses some of the best practices guidance that exists to help YSO leadership think about the elements of effective workplace training programs, and offers guidance about how to adapt and integrate training programs into their environment, culture and circumstances.

There are many types of publicly and commercially available child sexual abuse prevention training resources, materials and programs – from books, to pamphlets and informational fact sheets to 15-30 minute on-line narrated videos; 60-90 minute online state-sponsored training programs for mandated reporters; and 1 or 2- day onsite training courses by public and private

abuse prevention agencies and risk management service providers to name just a few.⁵⁹ Some YSOs have even created their own in-house training curricula.

Any YSO, no matter how large or small, can benefit the children and youth it serves by implementing a child abuse awareness/prevention training program for its personnel. But it can be difficult – particularly for those YSOs without experience, or without personnel with training backgrounds and/or who are familiar with this topic – to determine which training materials and programs are best suited for their mix of staff and volunteers, and most cost-effective for their organizations. Some of the larger YSOs like public and private schools, faith-based organizations and others may also take on (or be mandated to take on) the added responsibility of training children, youth and parents – adding another level of complexity to the decision-making process (more on this below).

Whether the YSO is large or small, one of the best ways to get started is to seek out and consult with local area social service providers like the Department of Children and Families, the regional Child Advocacy Centers, the Children’s Trust, the Office of the Child Advocate and others mentioned in the Resources section below. These agencies and others can provide a wealth of local expertise about training options, informational materials, and curricula that have demonstrated effectiveness – and can help save a lot of time in terms of formulating an appropriate training strategy.

When selecting or designing a training program, it is important to build or to look for products that reflect good teaching and learning practices, and that offer participatory, problem-based learning experiences that are interactive and actively engage the learner. Effective programs present information from a positive viewpoint, encouraging healthy behavior rather than forbidding poor behavior, help participants to feel responsible for dealing with the problem, and teach and encourage intervention behaviors – sometimes even using role playing to help trainees find comfortable and appropriate ways to express their discomfort with another's behavior, or to come forward and report suspected child maltreatment.

The goals, objectives and requirements of the organization’s child abuse prevention policies should also be addressed and made clear in the training program. An introduction by a recognized authority or by company leadership should set the stage by articulating leadership’s commitment to building and maintaining an environment in which employees, volunteers and children/youth are free from adverse behaviors, and feel safe, supported and respected.

⁵⁹ See the website of the Child Welfare Information Gateway for examples of sexual abuse prevention training programs (<https://www.childwelfare.gov/topics/preventing/prevention-programs/sexualabuse/>)

The bulk of the training content should follow the Policies and Procedures and Code of Conduct by including definitions of abuse and neglect and their symptoms as well as acceptable, unacceptable and harmful behavior; how to recognize and report suspicions of abuse in accordance with Massachusetts state law and organizational policy; encouragement for constructive, mutually respectful ways of behaving; the prohibition against retaliation when reports are made; and assurance that the YSO and its leadership will take immediate and appropriate corrective action when it determines that policies have been breached, or a child/youth is in danger. Essentially, in whatever form is implemented, the training should answer some basic questions: What is child abuse? How can I help prevent it? How do I recognize it if it's happening? And What do I do about it?

The section also offers, in chart form, suggestions about the elements that should be included in all sexual abuse prevention training programs, with particular attention paid to describing a continuum of the basic information the training should contain, the knowledge it should provide, and how that knowledge ultimately translates into practice and a set of desired outcomes and skills. Although some YSO's employ a "one size fits all" training program that is provided to all staff – the section offers an approach that differentiates among critical training content for various audiences: employees; contractors, consultants and interns; volunteers; children and youth; and parents/caregivers.

If appropriate (or mandated) because of the size of the YSO, and/or the services it provides, well-designed and developmentally appropriate personal safety and sexual abuse prevention training programs for children and youth may also be required. Such training can teach children and youth basic skills that will help them stay safe in potentially dangerous or abusive situations – particularly with respect to sexual abuse. Of course, the primary responsibility to protect children and youth from sexual abuse always rests with adults. But even though adult caregivers can make every effort to provide a safe environment for children and youth, they can't always be there to protect them from exposure to every potentially harmful situation. The section also discusses the elements to consider when looking at and evaluating training curricula for children and youth, addresses some of the common misperceptions about the effects of sexual abuse prevention instruction on children and youth, and includes a checklist for assessment and selection.

The most effective programs for children and youth also incorporate some form of parental materials designed to keep parents and caregivers "in-the-loop" regarding the safety concepts and skills being taught to their children/youth. In their simplest form, these are represented by short, informational letters that go home with the children and youth and identify the safety concepts being taught during the lessons, and emphasize the partnership between the YSO and

family in the endeavor to keep children safe. In expanded form, the safety concepts are listed along with suggestions as to ways parents can reinforce the topics and skills being taught, with family worksheets containing activities designed to carry on safety-related conversations in the home. Some curricula also include informational films for parents that model ways to communicate with children about personal safety issues in various scenarios. Whichever method is selected, some standard way of communicating with and educating parents is well worth the effort in terms of increasing the effectiveness of such programs.

The bottom line is that whether a YSO is large and provides services all over the state, or is small and has a single storefront location, the children and youth served can be better protected from child sexual abuse by increasing staff awareness about its existence, how to recognize it, and what to do if it is observed, suspected or disclosed. Staff training and education helps to ensure that YSO leadership and staff are prepared to respond if and when it becomes necessary.

Table 7, below, identifies what the Task Force considers to be the minimum required standards for adult training for YSO staff and volunteers.

Table 7

Minimum Required Training Standards and Content for Adults
<ul style="list-style-type: none">• All YSO employees and volunteers need some form of annual awareness training about child abuse and neglect. Options include:<ul style="list-style-type: none">○ Handouts, flyers, brochures, fact sheets○ On-site presentation/discussion (facilitated by in-house personnel or external agency)○ Online training (individual and/or group)○ Partnering with local YSOs/agencies already conducting training• YSO staff and volunteers need to understand the specifics about child abuse and how to recognize it:<ul style="list-style-type: none">○ Definitions○ Statistics about prevalence○ Physical and behavioral symptoms of abuse○ Offender patterns (grooming)○ Long term impact on child development• YSO staff and volunteers need to understand and agree to comply with the YSO's child protection policies and procedures including:<ul style="list-style-type: none">○ Safe environment and safe technology policies○ Code of conduct○ Screening and hiring procedures○ Reporting procedures (including both the Massachusetts mandated reporter requirements and the YSO's reporting chain)• YSO Staff and volunteers need to know how to respond to children and youth they suspect are being abused, and how to handle direct and indirect disclosures.

Key Findings and Recommendations

- Training and education are significant elements of any YSO's child sexual abuse prevention and intervention efforts. Minimum required training standards for YSOs are identified.
- Training programs should be offered at least annually to all administrators, employees and volunteers to heighten awareness of the YSO's commitment to child and youth safety and zero tolerance for their abuse.

- Training objectives should include guidance on how to establish and maintain professional boundaries, how to intervene when boundaries are being violated, understanding the definitions of child sexual abuse and other forms of child maltreatment, recognizing the physical and behavioral signs of abuse, responding to a child's/youth's disclosure, and understanding both Massachusetts law and the YSO's policies regarding the reporting of observed, suspected or disclosed abuse.
- Depending on YSO size and resources, training implementation strategies can include distribution of pamphlets, brochures and factsheets about child sexual abuse followed by in-house discussion; Internet-based training and webinar options; partnering with organizations already conducting training; and onsite training by external consultants or agencies.
- There are multiple strategies to identify, select and implement training materials and programs. Checklists and resources are provided along with an Implementation Toolkit to assist YSOs in identifying appropriate evidence-based curricula.
- Some YSOs, because of size, the services provided, state mandates or other requirements may also be required to train children, youth, parents and other caregivers. Best practices for selection and implementation at all grade levels are provided.
- Training should take place before interactions with children begin (or employee/volunteer should be accompanied by trained personnel until training is completed).
- Training (or refresher training) should be repeated at least annually and include a method for confirming participation and completion.

Recommended Implementation and Decision Making Model

STEP 1: Use the material in Table 7 above and in Appendix 12 to determine how many of the minimum required abuse prevention training standards are present in the YSO.

- The existence of child safety policies and procedures, and a code of conduct that identifies acceptable, unacceptable and harmful behaviors and outlines required reporting procedures is a starting point.
- Determine how many individuals need to be trained and at what levels – focus initially on those who will have direct, unmonitored access to children.
- Assess the resources and expertise on hand (and/or available) to help determine the scope of the training program and an implementation strategy.
- Appoint an individual or group to take responsibility for all aspects of the training program and empower them with the authority necessary to enforce and accomplish compliance with the YSO's training requirements.

STEP 2: Research and select informational materials and programs that can provide the required training in identifying, responding to and reporting child abuse, or provide information to augment and enhance YSO-specific training in policies, procedures and requirements.

- Consult and/or partner with state and local prevention expertise to determine the types of training programs available, as well as their cost, format, length and schedule.
- Determine how best to combine that training with prevention information and requirements specific to the YSO (e.g., Code of Conduct, reporting requirements for all staff, internal points of contact and reporting chains, etc.).
- YSOs can utilize the abbreviated materials in the section-specific appendices to augment or customize the training.
- Explore possible attendance at workshops, seminars, conferences, symposia and other similar child abuse prevention training events that may be accessible through schools, school districts, social services, faith-based or other professional organizations.
- If training children, consider only curricula that are evidence-based and have a record of being evaluated for effectiveness. Utilize criteria for evaluating and selecting effective programs published by the National Center for Missing and Exploited Children.⁶⁰
- Include a component that encourages parental involvement within the child/youth sexual abuse prevention program. This component should inform parents about child sexual abuse topics including but not limited to characteristics of offenders, grooming behaviors, symptoms, and how to discuss this topic with their children.

STEP 3: Implement training using one or more of the training strategies outlined below.

- Set a schedule that allows staff and volunteers multiple opportunities to attend the required training.
- Select a venue and ensure it has the necessary equipment for a training event: projectors, screens, white boards, notepads, sticky notes for “parking lot” issues, round tables for small group discussion, refreshments, etc.
- Ensure that the introduction addresses the reality that the training might be difficult for some, particularly for those who have had experience with personal or family abuse, and that attendees can excuse themselves if they feel the need. Make sure to talk with them later.
- Ensure some method of taking attendance.
- Consider issuing “certificates of completion”.

⁶⁰ Guidelines for Programs to Reduce Child Victimization: A Resource for Communities when Choosing a Program to Teach Personal Safety to Children (<http://www.safechild.org/PDF/Guidelines%20for%20Chid%20Safety.pdf>)

- Consider an evaluation component with measurable outcomes.

End of Executive Summary

Goal: To research, identify and implement effective education and training materials and programs about child sexual abuse prevention for all YSO staff and volunteers and, if appropriate, to research, identify and implement effective, developmentally sequenced, and evidence-based personal safety and abuse prevention education for children, parents and caregivers.

General Principles:

YSOs have the opportunity to support and empower young people to feel confident, protected and safe in their homes and communities. Staff, volunteers, parents and young people who collectively share the responsibility for preventing child sexual abuse, can be provided with the information and skills they need to confidently create safe environments for children and youth. While the scope of training must be adapted to the size and unique characteristics of any particular organization, the universal goal of maintaining safe environments for children and youth is attainable, regardless of an organization's mission, culture or resources.

Organizations that provide comprehensive training to their staff and volunteers let potential offenders know they are keenly aware of the threat of sexual abuse, are committed to talking about it, and are capable of confronting and exposing anyone who abuses or attempts to exploit children and youth. They also send the important message to victimized children and youth that they are not to blame, but are heard, believed and supported, and can serve as models and resources for parents and communities to take positive action.

Informing frameworks: the approaches in the chart below can be used to give your YSO the greatest effect when training adults, youth and/or children. Grounding the development of a training program in one or more of these frameworks will provide better results for the participants trained.

Informing Frameworks

- Adult Learning Theory
(http://www.umsl.edu/~henschkej/articles/a_The_%20Modern_Practice_of_Adult_Education.pdf)
- Age Appropriate Child Development Approaches
(http://lrrpublic.cli.det.nsw.edu.au/lrrSecure/Sites/LRRView/7401/documents/theories_outline.pdf)
- Positive Youth Development Models
(<http://educationnorthwest.org/sites/default/files/resources/factsheet13.pdf>)
- Strengthening Families Framework
(<http://www.cssp.org/reform/strengtheningfamilies>)
- Evidence based / evidence-research informed / promising practice theory based
(https://jfs.ohio.gov/OCTF/Evidence_Based_Evidence_Informed_Promising_Practice_and_Emer.pdf)
- Nine Principles of Prevention Programs
(http://www.azrapeprevention.org/sites/default/files/cdc_nine_principles_0.pdf)

This section will address some of the best practices guidance that exists to help employers and organizations think about the elements of effective workplace training programs. Whether designed in-house, provided by a government or state agency, or purchased from a commercial vendor, workplace training programs can take many forms. On site, face-to-face facilitated training in a small or large group setting; online training that can range from a succession of narrated (or silent) PowerPoint slides to a more dynamic webinar format with a live trainer and real time interaction; or combinations of on-site and on-line delivery, are current methods of delivering training content.

Increasingly, employers are trending more towards the power and flexibility offered by online delivery systems. Although there are limitations to online training (e.g., the lack of interaction with a facilitator, the ability to ask real-time questions, small and large group discussions, etc.) it can provide a cost and time-effective option for both small and large YSOs. Accessible on a YSO's website or via password on a government or commercial site, most online training platforms log in the learner by name and position and collect whatever other information is needed to identify the person being trained and, in some cases, the type and level of training needed, and issue a report to administrators about who has and who has not completed the training. Many online training programs are also self-paced – and keep track of where the learner is in the training and allow the person to pause or stop and resume later.

Besides administering the training, programs can also link to the YSO's policies and procedures and code of conduct, and to state reporting laws for reference. Training modules can also administer periodic section or topic-specific vignettes and quizzes, score them, provide feedback on both correct and incorrect responses, administer a final examination, record the examination results, and either issue a certificate of completion or allow the test to be taken again. YSOs should also check with their insurance providers or risk management agencies to inquire about the abuse prevention training programs they may provide to clients. A list of online and onsite training resources is provided in the Resources section in Appendix 6 and in Appendix 12.

Each YSO is unique and each community has its own set of values, strengths and challenges. Whether online or onsite training options are used, they must be used to maximum effectiveness. To ensure that training is effective, it is important to:

- Set goals that are measurable and match the training with the organization's mission, the services it provides and the ages of children and youth served;
- Select a framework consistent with organizational needs;
- Ensure training is participatory (either by means of an onsite facilitator, or an individual who can be contacted after online training is accomplished);
- Utilize and reflect varied learning styles;
- Build on participants' knowledge;
- Ensure material is accurate, current and clear;
- Use trainers experienced in working with particular groups (staff, community members, families, children and youth, etc.) and with the topic;
- Create a safe environment for learning and discussion;
- Evaluate the training to ensure fidelity and effectiveness - use reliable evaluation tools (Kirkpatrick's⁶¹ Four Levels of Training Evaluation⁶² (in Appendix 12) is one of the best framework for evaluating trainings. Others are also listed)
- Make the training an element of ongoing professional development, and;
- Ensure that the training is:
 - Adaptable and responsive to the needs of different audiences, including employees, volunteers, and families.
 - Culturally responsive and includes the voices of children, youth, families and communities.
 - Trauma-informed in its approach.⁶³

⁶¹ <http://www.kirkpatrickpartners.com>

⁶² http://www.ct.gov/ctdn/lib/ctdn/ttt_14_m5_handouts2.pdf

- Open to providing opportunities for facilitated discussions and role play.
- Reinforced through regular supervision and dialogue.
- Periodically evaluated to ensure goals and standards are met (see several sample questionnaires and surveys from various organizations in Appendix 12).
- Repeated on a regular (annual) basis and updated as necessary

Essential Elements for All Child Sexual Abuse Prevention Trainings

Effective abuse prevention training, once accomplished, provides learners with new information, knowledge and skills. But how this new awareness and skillset are encouraged, applied and become part of the institutional “mindset” of an organization depends on the kind of environment and *culture* leadership builds to support best practice behaviors for the protection of children and youth. Following is a list of some strategies to consider:

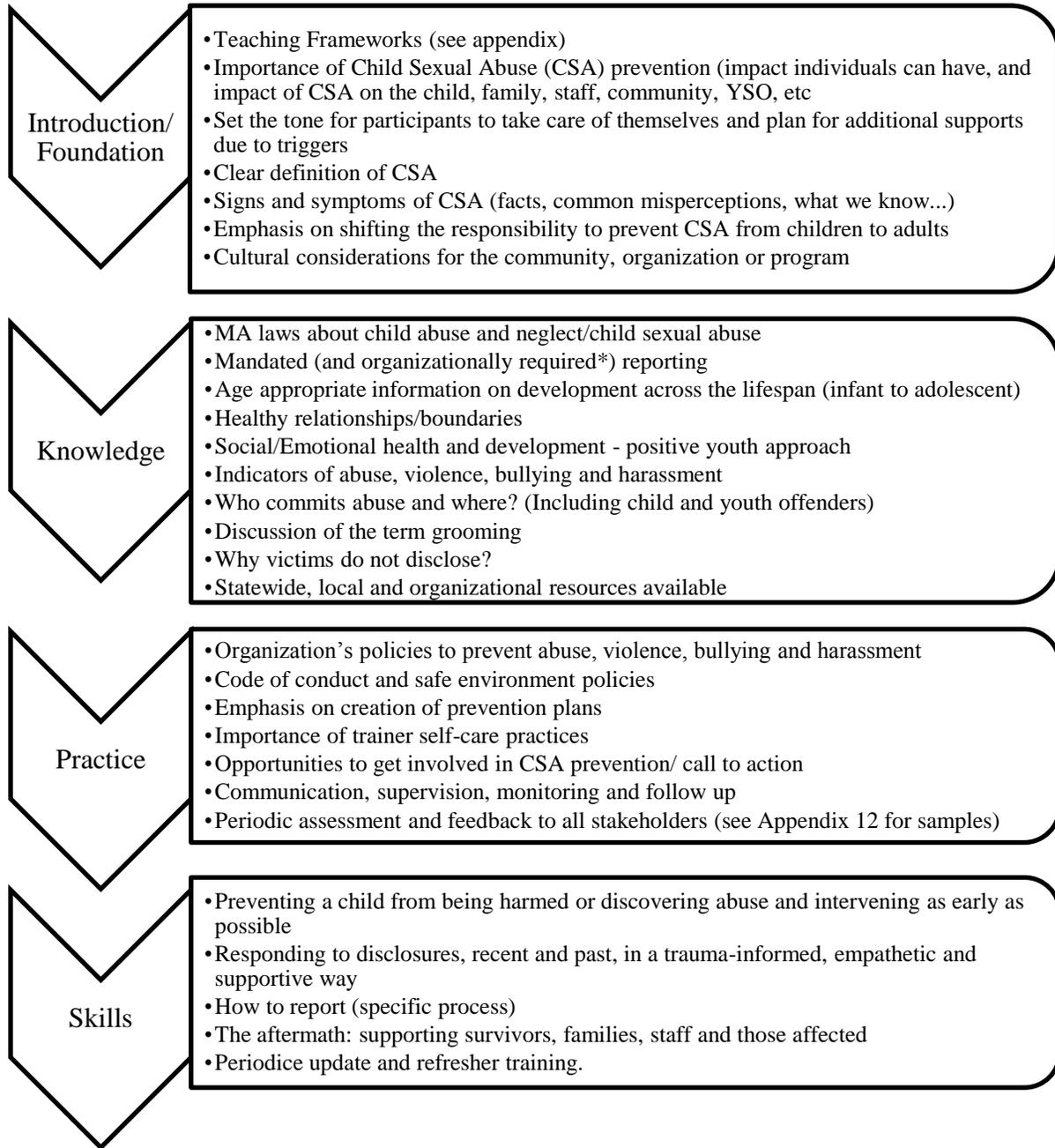
- Ensure that knowledge and skills gained through training are reflected in the daily practices of management, employees, volunteers, children, and youth served.
- As with the Code of Conduct (see Code of Conduct section above), make training content evident in personnel performance measures.
- Meld elements of your organization’s philosophy or mission with the child sexual abuse training (e.g., a faith-based organization may incorporate elements of its beliefs in the training).
- Integrate the training content into new staff or volunteer orientation and connect it to their specific work or service roles.
- Partner with child abuse prevention organizations to connect to resources

The following chart on the “Training Continuum” provides a visual framework for the continuum of information, knowledge, application and skills that well-designed training programs can support. Organizational mandates notwithstanding, trainees need to understand the context of why the training exists, and why it is important – its goals and expected outcomes. Information about indicators, symptoms, boundaries and resources provide the knowledge of what to look for, how to recognize sexual abuse and other forms of maltreatment, and to whom to go when it is suspected or observed.

⁶³ From the MA Sexual Violence Prevention Plan: “Trauma-informed prevention: Prevention strategies must be based in an understanding that any population selected for prevention activities will include people who have already experienced sexual abuse or who have abused others. Prevention programs will therefore commit to avoiding re-traumatizing, blaming victims, or colluding with abusive behavior/attitudes. They should also ensure that those delivering prevention activities have sufficient knowledge, skills, and connection to specialized assessment and treatment services to be effective bridges to those services when disclosures do occur.

Organizational planning, policy and practices should then support the required vigilance, communication and actions necessary to keep children safe, and provide feedback to all stakeholders. Eventually, the combination of information, knowledge and practice leads to the development of a set of skills and behavioral changes and the adoption of personal and organizational responsibility for child sexual abuse (CSA) prevention and intervention.

The Training Continuum



*There are professions & positions defined under state law as being mandated to report. However, there are a host of individuals who provide services to youth who are not ‘statutory’ mandated reporters. Volunteers, in particular, as well as others who are not providing services to children in a ‘professional’ capacity are not covered by the MA statutes. In these cases, the organization issues a policy that it expects ALL employees & volunteers, mandated by law or not, to report suspicions of abuse & neglect to a designated reporter who then (either independently or with the non-mandated reporter) can make contact with the appropriate authorities on behalf of the organization. (See also Recognizing, Reporting and Responding section above).

Training Elements by Audience (all of the above plus specifics for each target group)

Training programs in CSA prevention take many forms and contain varying levels of detail, sophistication, content, and length. Some YSOs employ a “one size fits all” program that is taken by all administrators, supervisors, employees and volunteers. Others have distinct levels of training in terms of the intended audience and duration: a longer training for administrators, supervisors, and program/project directors that includes information on organization policies, procedures, staff screening and hiring practices, supervision responsibilities, state laws and local reporting requirements; and a more streamlined training for “front line” staff and volunteers who engage directly with the children and youth. These latter training programs are less focused on administrative and policy concerns and are more “code-of-conduct” and “boundary” oriented, including guidance on interpersonal behaviors and relationships, how to recognize maltreatment, grooming behaviors, and how to respond to/report suspected maltreatment and inappropriate behavior.

Much depends on the size and resources of the organization, the number of staff, employees, volunteers and clients it has, and the varying functions and responsibilities of its employees/staff. Certainly, a training program for a small business that serves clients who are minors and has a single owner and two or three assistants would look different from a training program for a summer camp, school or other YSO with scores of employees and volunteers and hundreds of children and youth. Even so, there will be common elements in each that present the basic and most critical abuse prevention content the training is designed to provide.

For Employees/Staff/Leadership (includes all paid staff, including managers and senior leadership, board and governance members).

- **Critical Content for Training Employees**
 - All policies and procedures adopted by the organization (link to policies).
 - Child sexual abuse information (definitions, prevalence, indicators, physical and behavioral symptoms).
 - Importance of preventing child sexual abuse (grooming, short and long-term effects, ACES study⁶⁴).
 - Personal conduct and responsibility (See also Code of Conduct section above).
 - Supporting staff around disclosures and mandated reporting (link to MA state law and organizational policy about when, to whom, and how to report).

⁶⁴ See Introduction (Section 1) as well as: <https://www.cdc.gov/violenceprevention/acesstudy/>

- Define the continuum of appropriate, inappropriate, and harmful behaviors from the organization’s perspective (Also see Code of Conduct section above).
- Differentiate internal from external reporting chains for infractions that may be addressed by supervisors/managers rather than reported to DCF/law enforcement.
 - Reporting chains will also need to be defined for circumstances where the alleged perpetrator of a reportable offense is a current or former employee or volunteer (See Recognizing, Responding and Reporting section above).
- Describe risk and protective factors for victimization and perpetration.
- Address common myths about offenders, such as the myth that most people who sexually abuse are strangers to the youth, or that only adults abuse youth.

For Contractors, Consultants, and Interns (link to Codes of Conduct and Policies sections for written procedures)

- **Considerations for Contractors, Consultants and Interns**
 - Written, signed acknowledgement forms from consultants, contractors, and interns hired by the organization regarding adherence to organizational policies upon the start of any formal relationship, regardless of contact level with children and youth.
 - However, if the consultants/contractors hired by the organization are likely to have unsupervised contact or possible unsupervised contact with children/youth, then training should be included as below in “Volunteers” section.
 - Verification from the parent company that contractors, vendors and other service providers engaged by, but not employed by the organization have received appropriate screening and training.
 - Similar verification should be considered for organizations allowed to rent or utilize organization facilities or space for use with children/youth they will bring onto the property

For Volunteers

- **Differences between employees and volunteers**
 - Depending on the organization, education/training for volunteers should differ. Trainings should be based on the volunteer role and the level of their engagement with children/youth.
 - Volunteer-specific training would look very different for volunteers who meet with youth in a supervised site versus on their own in the community.

- The same holds true for interns, consultants, or contractors at an organization.

Who needs training?

- The following volunteers should be trained in child sexual abuse prevention:
 - Anyone who has the opportunity to engage or connect with children and youth informally or formally—whether the contact is supervised or unsupervised
 - Volunteers, interns, consultants, and contractors with access to or supervision over youth, including adults and youth in leadership positions
 - New and current volunteers, interns, consultants, and contractors

Educating Children and Youth

Although the Task Force believes that all children and youth should receive training and education on issues of personal safety and abuse prevention, only some YSOs will be responsible for providing such curricula to them. Both the Child Welfare Information Gateway⁶⁵ and the National Sexual Violence Resource Center⁶⁶ have resources available to help select and evaluate available programs. The Resources section below also contains contact information for national level organizations that have created sex abuse prevention, anti-bullying and anti-harassment curricula. Also see Appendix 12 for recommendations on critical content for training children and youth; a table of age appropriate learning standards and lesson objectives; a list of elements to consider when identifying and selecting training curricula for children and youth; and a list of resources and reports that identify abuse prevention curricula that have been evaluated for effectiveness.

Educating Parents and Other Caregivers

Parents as well as other caregivers need to receive, at minimum, the same level of prevention education as their child or youth. Parents can be strong representatives and advocates in promoting the safety of their child or youth while participating in educational, sport, cultural, religious/faith, or recreational activities. However, parents always bring their own experiences and cultural contexts to this issue, so care should be taken in both educating parents/caregivers and in accommodating their response.

⁶⁵ <https://www.childwelfare.gov/topics/preventing/prevention-programs/schoolbased/>

⁶⁶ http://www.nsvrc.org/sites/default/files/Publications_NSVRC_Guide_Child-Sexual-Abuse-Prevention-programs-for-children.pdf

Keep in mind issues of food, transportation, and childcare when engaging parents/guardians in education about child sexual abuse. For example, when hosting meetings or trainings with parents on a workday evening, childcare and dinner for parents and their children could be considered, as well as transportation for those parents and children who might not be able to access the prevention education otherwise.

Two main areas of education should be emphasized with parents and guardians of youth served by YSOs:

- Education specific to child sexual abuse.
- Education about the organization's child sexual abuse prevention policies and procedures.

Critical Content for Training Caregivers

- Child sexual abuse information
 - Understand child sexual abuse and their role in preventing it.
 - Define child sexual abuse, including grooming and the continuum of appropriate, inappropriate, and harmful behaviors (see section on Code of Conduct).
 - Challenge commonly held myths about child sexual abuse (e.g., that most offenders are strangers and easily identifiable).
 - Describe warning signs for sexually offending behaviors and victimization (i.e., what to watch for).
 - Discuss how to talk to their children, in developmentally appropriate ways, about sexuality and child sexual abuse. Emphasize use of natural teaching moments during family time, meals, playtime, etc.
- Discuss how to talk to other adults about child sexual abuse and behaviors that violate boundaries and privacy.
- Explain caregivers' responsibility to act if they witness or hear about inappropriate or harmful behaviors.
- Identify the person in your organization to whom parents can go for help or questions.
- Identify prevention, treatment and reporting resources outside your organization (See Reporting and Responding section above and "Resources" in Appendix 6).
- Explain the elements of healthy sexual development and play (e.g., what is appropriate and when).

Organization’s child sexual abuse policies and procedures

Caregivers should be informed about the YSO’s child sexual abuse prevention policies and procedures so they know what the organization expects of them and what they can expect of the organization and its employees/volunteers.

- Describe the YSO’s mission and role (see section on mission statements and codes of ethics/conduct).
- Define what activities are appropriate and inappropriate in the organization, such as whether it sponsors overnight trips, mentoring, or one-on-one coaching.
- Delineate responsibilities of the caregiver and the organization. For example, define who is responsible for transporting youth.
- Encourage caregivers to attend sessions and programs whenever they can to make sure youth are being protected and policies are being followed.

Training Implementation Toolkit

The purpose of a Training Toolkit is to support organizations and programs in planning, implementation, and the evaluation and sustainability efforts of their training programs.⁶⁷ The tools, resources and strategies help engage a variety of training participants, maintain a focus on desired competencies, and evaluate for training goals.

Training Implementation Toolkit

Crucial Components

- Planning, Needs Assessment, Organizing
- Design, Development and Delivery
- Evaluation
- Public Awareness Materials / Communication documents
- Information for Parents, Community members, staff and volunteers (brochures, checklists etc.)

Elements to Consider when Identifying Potential Training Curricula for Adults

⁶⁷ See: http://www.floridahealth.gov/programs-and-services/emergency-preparedness-and-response/training-exercise/_documents/trainer-toolkit.pdf

Adult Training Programs

Adult Training Programs strive to educate adults in the community about child sexual abuse prevention and their responsibility for preventing abuse from occurring in the first place. Training programs for adults must be firmly grounded in Adult Learning Theory and must provide participants with strategies and tools that can be easily implemented. Trainings must be offered in a variety of formats and be considerate of scheduling conflict and learning styles.

Training content for adults should include:

- What is child sexual abuse?
- Adult responsibility
- Grooming
- Signs and symptoms
- The impact of child sexual abuse on a child, adult and community
- Strategies for responding to child sexual abuse (local resources, online resources, state and national resources)
- Self-care strategies
- Prevention strategies
- What adults can do to protect children and youth in their communities

Additional Resources

Grooming: <http://www.redwoodsgroup.com/static/media/images/recognize-patterns.jpg>

Protecting children through hiring practices:

<http://www.redwoodsgroup.com/static/media/resources/documents/protecting-children-through-hiring-practices-ymcas.pdf>

Recommendations

- Regular trainings should be offered so that new employees can be trained before having access to children/youth. This could be achieved through a combination of online trainings, and training collaborations among local youth serving agencies.
- Trainings must be available in multiple languages and be culturally relevant. It is not strangers who are the main offenders in child sexual abuse. Children and youth are much more likely to be abused by people they know and trust. Organizational training on CSA prevention can best decrease the chances that a child will be harmed.

- Youth serving organizations should consider partnering locally with other, similar organizations to ensure consistent messaging among them.
- Large local organizations should make trainings and capacity building available to other/smaller youth serving agencies in the area so that resources can be shared to increase the safety of all children and youth within the community. Examples include regional trainings and training partnerships.

Recommended Implementation and Decision Making Model

STEP 1: Use the materials in Table 7 above and in Appendix 12 to determine how many of the minimum required abuse prevention training standards are present in the YSO.

- The existence of child safety policies and procedures, and a code of conduct that identifies acceptable, unacceptable and harmful behaviors and outlines required reporting procedures is a starting point.
- Determine how many individuals need to be trained and at what levels – focus initially on those who will have direct, unmonitored access to children.
- Assess the resources and expertise on hand (and/or available) to help determine the scope of the training program and an implementation strategy.
- Appoint an individual or group to take responsibility for all aspects of the training program and empower them with the authority necessary to enforce and accomplish compliance with the YSO’s training requirements.

STEP 2: Research and select informational materials and programs that can provide the required training in identifying, responding to and reporting child abuse, or provide information to augment and enhance YSO-specific training in policies, procedures and requirements.

- Consult and/or partner with state and local prevention expertise to determine the types of training programs available, as well as their cost, format, length and schedule.
- Determine how best to combine that training with prevention information and requirements specific to the YSO (e.g., Code of Conduct, reporting requirements for all staff, internal points of contact and reporting chains, etc.).
- YSOs can utilize the abbreviated materials in the section-specific appendices to augment or customize the training.
- Explore possible attendance at workshops, seminars, conferences, symposia and other similar child abuse prevention training events that may be accessible through schools, districts, social services, faith-based or other professional organizations.
- If training children and/or youth, consider only curricula that are evidence-based and have a record of being evaluated for effectiveness. Utilize criteria for evaluating and

selecting effective programs published by the National Center for Missing and Exploited Children.⁶⁸

- Include a component that encourages parental involvement within the child/youth sexual abuse prevention program. This component should inform parents about child sexual abuse topics including but not limited to characteristics of offenders, grooming behaviors, symptoms, and how to discuss this topic with their children.

STEP 3: Implement training using one or more of the training strategies outlined above

- Set a schedule that allows staff and volunteers multiple opportunities to attend the required training.
- Select a venue and ensure it has the necessary equipment for a training event: projectors, screens, white boards, notepads, sticky notes for “parking lot” issues, round tables for small group discussion, refreshments, etc.
- Ensure that the introduction addresses the reality that the training might be difficult for some, particularly for those who have had experience with personal or family abuse, and that attendees can excuse themselves if they feel the need. Make sure to talk with them later.
- Ensure some method of taking attendance.
- Consider issuing “certificates of completion”.
- Consider an evaluation component with measurable outcomes.

*******END OF SECTIONS*******

⁶⁸ Guidelines for Programs to Reduce Child Victimization: A Resource for Communities when Choosing a Program to Teach Personal Safety to Children (<http://www.safechild.org/PDF/Guidelines%20for%20Chid%20Safety.pdf>)

ADDITIONAL CONSIDERATIONS

Executive Summary

Up to this point the Task Force report has presented the major building blocks, tools, decisions, strategies and resources that will help YSOs create or strengthen their existing child sexual abuse prevention frameworks. But gathering those things that are needed to do a job – as any mechanic or carpenter knows – is different from using those tools in the ways necessary to make a finished product. *How* the tools are used can make a big difference between a lasting repair and a temporary, band-aid solution.

The same can be said for attempting to make changes to systems and organizations – especially because they bring the human element into the mix and ultimately try to influence and facilitate changes in the ways people behave. Human nature being what it is, an employer can mandate the adoption of a child safety standard or child sexual abuse prevention framework, and require staff and volunteers to behave in certain ways when around or interacting with children, but that alone does not guarantee they will. Nor does it guarantee that even if they do, the mandated behaviors will continue.

This section of the report introduces the concept of organizational change as a *process* that evolves over time rather than as a single event that, once accomplished, can be assumed to be working properly to protect children. The process covers how organizations and the people within them react to change, and assumes that not everyone will move toward the desired goals at the same pace. Successful implementation depends both on the strategy or “roadmap” that YSO leadership employs for the desired change, and the organizational culture (e.g., organizational mindset, history, decision- making style, etc.) within which the desired changes are to take place.

The section also emphasizes the critical role of leadership in introducing, managing, and monitoring the progress toward implementing the abuse prevention programs, and the responsibility of staying involved throughout and beyond the initial stages of implementation - maintaining collaborative, ongoing communication with, and feedback to all stakeholders. Well-intentioned and well-structured programs run the risk of weakening over time if leadership assumes that implementation is equal to accomplishment, and turns attention elsewhere to the many other issues and demands that leadership requires. Suggestions and actions are discussed that can help YSO leaders prevent this from happening.

Another key aspect of sustaining a child abuse prevention program is data. No matter how small or large the YSO is, questions about what is working in its child abuse prevention efforts, what is not working, and what needs improvement will (and should) be asked by leadership as well as by a variety of stakeholders. The answers to these questions can only be derived from some form of data collection, and the section makes suggestions about the different types of data that can be collected for analysis and review. Three different types of sample data collection tools are included in the Resources section to assist YSOs in this effort: a “Child Sexual Abuse Prevention Evaluation Tool”; a “Sample Self-Audit Form for YSOs”; and a “Sample Incident Report.” Annual “self-audits” can provide “snapshots” of the current state of program implementation and help to measure progress and sustain outcomes. These annual snapshots can, in turn, be used to provide ongoing feedback to staff, volunteers, parents and all other interested parties. The Task Force also suggests that the Policies and Procedures themselves should be evaluated every 2-3 years and makes suggestions about how to accomplish this task.

Finally, the section suggests that YSOs need not be isolated in their efforts to build robust child abuse prevention programs, and stresses the importance of community partnerships. These and other collaborative efforts are essential for building relationships, sharing expertise, accessing services and training opportunities, and building legitimacy and advocacy in the communities within which the YSOs operate.

Implementation and Oversight

“The best-laid plans of mice and men often go awry.”

(Robert Burns, 1785)

According to legend, the Scots poet Robert Burns (1759 – 1796) was ploughing in his fields and accidentally destroyed a mouse's nest, which it needed to survive the winter. Moved to write a poem entitled “*To a Mouse*” (some say while his hand was still on the plough) the line above from one of the last stanzas is often used to mean that no matter how carefully a project is planned, something may still go wrong with it. This is not to suggest that something *will* go wrong but, rather, that implementing new ways of doing business in any organization can present a range of unique challenges and potential stumbling blocks – but they are challenges that can be anticipated and thus avoided and/or addressed.

Implementing a new child sexual abuse prevention framework, or even strengthening an existing one, requires significant time and effort in planning and execution. At some point – often after

months of work – the policies and procedures, codes of conduct, screening and hiring protocols, reporting requirements and training programs are ready to be presented to the staff and volunteers in the organization. But sometimes, the presentation may not be met with the expected enthusiasm because new programs require a change in the way things are done – and, in this case, the ways people *behave* as well.

Organizations (like many people) don't particularly like change. Fundamental change takes time, is uncomfortable, and often requires a lot of energy for what seem to be small, forward steps. When confronted with change – either personally or professionally – there is a natural tendency in many to focus on how to defend against it instead of how to use and succeed with it. Because of this, it is inevitable that not all elements of an organization undergoing change will move at the same pace. When a change is introduced to everyone in an organization, some will grasp the new way of doing business immediately, some will take a more considered approach and implement at a slower pace while trying to gauge effects as the change evolves, and some will avoid or resist change – even if mandated – for long periods of time.

This particular change also forces organizations and individuals to consider the uncomfortable issue of child sexual abuse and acknowledge the real possibility that the children they seek to support may also be exposed to risk through participation in the YSO's programs. The idea that "one of us" could sexually abuse a child is hard for many to accept.

Implementing system change is a tall order in any organization. Industrial/Organizational psychologists⁶⁹ suggest by their research that true change in an organization requires strategies and actions that impact the entire structure in positive ways with outcomes that:

1. Are tangible and measurable;
2. Have wide-ranging social appeal;
3. Benefit the lives of people both inside and outside of the organization;
4. Create decision making and communication structures for ongoing dialogue and permanent (sustainable) change;
5. Bring about change by changing traditional practice and, most importantly, by changing traditional behaviors into new ways of thinking and doing that create buy-in and a motivation to succeed.

These elements, however, must exist within a *process* that brings the conversation between leadership and staff/volunteers to a very different level than that of a set of mandates about new policies, procedures, programs and timelines. Two important factors in this process are the

⁶⁹ Rogers, E. M. (1995) *Diffusion of Innovations*. 4th ed. The Free Press, NY.

strategy for change (the roadmap for defining and implementing the changes management considers necessary for the organization's growth or development) and the culture (organizational mindset, history, decision making style, behaviors, accountability structures, etc.) within which the leadership desires the change to occur.

Natural conflicts exist between strategy and culture, and these conflicts – if left unaddressed – predict that significant change to any organization will not be a smooth, linear process or a one-time event, and that in times of crisis (or even when a crisis is past), organizations undergoing a change process that is not yet complete tend to “slide backward” and go back to traditional ways of behaving. Consequently, a sustained level of vigilance, encouragement and support by senior management is necessary for all levels of the organization undergoing change.

Consider, for example, a YSO attempting to implement a child sexual abuse prevention program for the first time. The administration appoints several staff members to create a new set of policies and procedures, new screening and hiring practices, and new training and awareness programs for staff. The boss also publishes a letter to all staff letting them know about the importance of protecting children, what's coming, periodically attends the planning meetings for updates, and talks about the effort at the quarterly “all hands” staff meetings. The strategy makes sense, seems to be a logical, orderly way to approach the task, has a list of products, and enjoys the boss' attention and support. After several months of work, the framework is ready, the boss announces that the changes are in effect immediately, and even attends the first training class to set the example and emphasize that the new requirements apply to everybody.

As time goes by, the training programs for all current staff are completed, training for new employees and volunteers happens in small groups as they are hired, the new organizational processes are in place, and there have even been a few anecdotal instances where the safety framework appears to have worked in terms of facilitating the children's safety. There is a growing sense of accomplishment and confidence that the children are now safer and, as that sense increases over time, the staff members who drafted the strategy resume their regular job responsibilities, and management turns its attention to other pressing matters. A year later, a child is harmed under circumstances that the strategy should have prevented. How could this happen?

A safety program may be adopted but not retained or sustained. After the initial set of activities to create and implement the safety structure fades into the past, and communication about it becomes less frequent, organizations and people have a tendency over time to view the policies, programs and initiatives as having addressed the situation – thus allowing them to turn their attention to the many other tasks, activities and daily problems that normally demand their attention. It is when that happens that the “corporate memory” about *why* these programs exist

begins to weaken and vigilance can suffer. If an organization lets that happen, it does so at great risk.

Turnover of staff and volunteers can also add to this effect, as each succeeding “generation” of managers, employees and volunteers is further removed from the energy and enthusiasm of the initial effort. Unless there is regular and widespread communication to the organization about the importance of the abuse prevention programs, policies, and procedures, why they are in place, what they are intended to do, and how they are working, the *practice* of maintaining safe environments can weaken. In other words, a YSO can invest significant time and effort to implement a new safety framework, but it must also pay attention to the longer processes of adapting, revising, evaluating, providing feedback and sustaining the implementation over time as it becomes a new part of the organizational culture.

Communication

Two important keys to helping organizations change and sustain behaviors are the amount of communication that occurs about the new expectations and the number of people involved in the communication. Open and extensive lines of communication ensure that more people know about a new initiative sooner. In attempting organizational change, leadership must make the case - and provide mechanisms for enabling the change and its assessment. Top leadership must then hold itself, all management, and all employees accountable to “be” the desired change in all their attitudes and actions. An important element for sustaining forward momentum in child abuse prevention initiatives is communication about how the effort is evolving, and feedback from leadership reflecting its ongoing commitment to the process. This feedback should include:

- Regular reminders (newsletters, bulletins, newspaper articles, etc.) of the responsibilities associated with maintaining safe physical and virtual environments, how the YSO is complying with those responsibilities, and the results associated with doing so;
- Periodic statements by the organization’s leadership concerning the ongoing commitment to its child protection policy and to the vigilance necessary to protect children and youth;
- Organization-wide distribution of policies and procedures for child protection, the code of conduct, abuse reporting procedures and lines of communication, results of recent internal safety “audits”, etc.;
- Organizational updates about the status of programs, schedules for training, lists of the categories of people to be trained;
- Checklists about what is necessary to have in place or to have accomplished to be considered in compliance with the YSO’s safe environment policies, and ready for an on-site, off-site, or overnight activity;

- A regular flow of information and data from departments and communication with individuals about their particular experiences with the requirements (perhaps, as stated in the Code of Conduct section above, as part of regular supervision and performance reviews);
- Safety awards, certificates or recognition for individual or group efforts to ensure the safety of the children/youth in the organization’s care;
- Internal audits and data collection concerning outcomes that demonstrate whether and how the desired results are being achieved and maintained (more below);
- Periodic evaluation of the overall policies (more below), and;
- Identification of an individual or small team to continue facilitating and monitoring the change process and become a resource to others in the organization.

Frequent communication from YSO leadership to all constituencies (including parents) about its commitment to child abuse prevention and to child/youth safety helps to ensure that supervisors, staff and volunteers are not only aware of the requirements, but also helps to build ongoing awareness, sustain vigilance, and create an environment where unsafe practices are noticed because they are not the norm, and where they can be corrected before a child or youth is harmed. Communication and support from leadership helps to transform *policy* into *practice*.

With the elements above in place, organization leaders help to build a *culture* of safety that maintains a strong and permanent vigilance over the well-being of the children entrusted to their care – not because it is some “requirement” imposed by “people up the chain”, but because it is part and parcel of an ongoing personal and communal behavioral commitment to keep the children safe and protected. Sustaining a new child abuse prevention program depends on empowering all managers, supervisors, employees and volunteers and growing their sense of ownership and responsibility.

A positive organizational culture should require (among other things) adherence to a clear code of conduct, and education for all its members about child sexual abuse. It should facilitate the reporting of abuse by normalizing conversations about child maltreatment, encouraging all members to monitor and to speak up when infractions occur or unsafe situations are observed, helping people to overcome their natural reluctance to report or to “get involved”, and ensuring that all suspicions or allegations involving potential harm to children and youth are taken seriously and that no one is considered exempt from an investigation due to his or her prestige, seniority, or status. In any organization, there is a great difference between leadership that exerts “*power over*” their subordinates in trying to get something done, and leadership that gives subordinates the “*power to*” be participants in the change process with the opportunity to help it

evolve over time. The requirements for true system and behavioral change require a high level of sustained commitment and a relentless effort.

Analysis, Review, and Self-Audit: Measuring Progress and Sustaining Outcomes

“Mathematics” and “measurement” are words that send many people scurrying to find cover, but in the world of organizational change, numbers play an important part in helping YSOs to gauge progress toward their goal of keeping children and youth safe. Consider, for example, beginning a weight loss or fitness program. Without periodically collecting numbers like weight, inches, or heart rate and blood pressure, how would a person determine if he or she was making consistent progress toward the goal of better health? Similarly, without any type of measurement, it would be difficult to figure out if a person’s efforts to make changes in diet and/or exercise were having the intended effects. Numbers collected over time can tell us if we’re heading in the right direction and – later – once we (hopefully) reach the desired goal weight, waist size or heart rate, *sustaining* the accomplishment into the future is likely to depend on continued, periodic measurement. The same can be said for the programs, changes and goals that YSOs set in place to keep children safe.

The overall goal of the initiatives described in this report is one of primary prevention, *i.e.*, to create and help to facilitate an environment in the youth-serving organizations, businesses and institutions of Massachusetts that, once in place, would serve to protect children and youth by preventing child sexual abuse before it occurs. A second goal is that if a child or youth in the care of a YSO becomes the target of sexual abuse or human trafficking/sexually exploited child, that child or youth would have knowledge sufficient to distinguish safe from unsafe touching and relationships, and know what to do if unsafe touch occurs – including how and when to seek assistance from a trusted adult – and have the skills and language to report the abuse. A final goal is that, should child abuse or neglect be suspected, observed or disclosed to any administrator, supervisor, staff member, employee, or volunteer, that individual would possess the knowledge, information, and resources to ensure it is reported to the appropriate organizational and civil authorities according to the reporting laws of the Commonwealth of Massachusetts.

Given these goals, the investment in time and effort necessary to put a safety framework together, and the need to provide feedback to the organization, the following questions will naturally come up:

- How do we know if it’s working?

- Are children and youth in the YSO any safer now than they were before these new programs and structures were put into place?
- Is the YSO more capable of keeping children safe?
- If they are safer, what were the primary factors that had the greatest effect?
- If they are not safer, what factors lead to this conclusion and what needs to be changed, corrected, strengthened or eliminated?
- How effective are the YSO's existing compliance and audit efforts?

An essential element of developing, implementing, and sustaining a successful child abuse prevention framework is data – data about the ongoing programs, how they are being integrated into the YSO, what is working, what is not working, and what needs to be improved. The questions can be “qualitative” (as above) seeking answers that are more subjective, or “quantitative” (as below) seeking objective information like numbers, percentages and quantities that can help to gauge progress.

- How many people are there in the organization (and in each job classification) who require the safety training?
- How many have received the required training?
- How many are left to train?
- Have the safety materials been distributed?
- Has everyone who received the required training also received a background and criminal history check?
- Are the safety curricula (if appropriate) being taught to the children/youth?
- Have all staff, employees and volunteers received and signed the Code of Conduct?
- How many reports of suspected or alleged abuse and neglect have been filed?
- Have the reports been handled correctly (i.e., within the required timeframes)?

Depending on the size of the YSO, the data to be collected and analyzed – or even simply summarized – could be considerable. Therefore, no matter what the size of the organization is, it is important in the early stages of building a child safety framework to also think about the kinds of questions that need to be periodically answered, and the data that need to be collected to answer those questions.

Organizations can use simple checklists with “yes” or “no” responses, and a tally of the numbers of employees and volunteers who have attended the required training, signed the code of conduct, and complied with other requirements set by the leadership. This allows a YSO to gather basic, numbers-oriented information about the implementation of the safety program, and

then use those numbers to provide feedback to both leadership and staff about progress, and the level of compliance with the new program requirements.

The numbers can also be used to keep parents and others informed about what the YSO does to ensure their child's safety before enrolling them. A YSO that does basic data collection can say to parents *"We are committed to child safety: We have a set of published safety policies and procedures, and all our staff and volunteers are screened. All members have a signed code of conduct on file, and have been trained in child/youth safety, the prevention and recognition of maltreatment, and in their abuse reporting responsibilities under Massachusetts law"*. Hearing a statement like this, and/or seeing a statement to this effect on YSO brochures and materials can help to put parents more at ease. A sample "Child Sexual Abuse Prevention Evaluation Tool" that can be used to tally the required safety elements in a comprehensive safety program is provided in the Resources section below.

Changes in staff practices and behaviors are a bit more complicated to measure and rely more on ongoing observation and monitoring to assess improvements (see also the section on Code of Conduct above). A good rule of thumb to remember is that all improvement requires change, but not all changes lead to improvement. Unless there is an ongoing commitment to gauge staff attitudes about the desired changes, and to gather information about the behaviors that will indicate whether those attitudes are being translated into the desired actions, YSOs may be tempted to stop measurement altogether when the policies are published and everyone has been trained. This does little to determine if the changes have been adopted into the culture of the YSO.

Some basic tools – both introductory and advanced – that exist for the measurement and evaluation of child abuse prevention programs are listed on the website of the Child Welfare Information Gateway.⁷⁰ An annual data collection process or "self-audit" can help all YSOs to understand (and explain) the basics of how the implementation is progressing. A simpler variation of the Child Sexual Abuse Prevention Evaluation Tool mentioned above entitled "Sample Self-Audit Form for YSOs" is included in the Resources section below. More comprehensive data collection can also enable them to measure organizational, cultural, and behavioral change, and whether or not what is being implemented supports the desired outcome of making the environment safer.

Some YSOs may want only to collect information about program implementation, and basic information about the number and types of "internal" allegations encountered during the year

⁷⁰ www.childwelfare.gov/preventing/evaluating/tools.cfm

(i.e., the number of reports filed involving staff, volunteers or other children and youth) and how they were handled. Other YSOs may want (or need) to take a broader look to answer questions about the effectiveness of their programs from a wider variety of stakeholders like funders, insurers, boards of trustees, etc.

For example, a broader perspective would consider that since the YSO has been working to build or improve its child protection policies and procedures, modify organizational structures to respond effectively to abuse reports, update codes of conduct, and educate adults (and children if appropriate) about how to recognize dangerous situations and report them, that *all* types of abuse and neglect are likely to be reported – including domestic, extended family, dating, and neighborhood situations.

In terms of measuring the effectiveness of what the YSO has instituted, initial assessments could focus on gathering data on the numbers and types of reports being filed, how (and through whom) they came to the attention of the YSO (observed, suspected, self-disclosed), how quickly they were reported to the YSO's reporting authority and/or to DCF, whether those to whom the abuse was reported knew what to do, and any information about outcomes of cases. The data can be collected without using the names or other identifying information, but should be treated as confidential and kept in a secure location. Asking respondents to also supply examples of observed "safe" behaviors among children and youth, or increased awareness of the safety rules, would underscore their response with additional anecdotal information. An example of a basic "Incident Report" is included in the Resources section below.

In terms of behaviors and desired outcomes, one could argue that by collecting data of this type on an annual basis, a YSO could have an ongoing awareness of the numbers and types of abuse and neglect cases its children are experiencing, and could at least have some indication that children are learning the skills, have used those skills to report to a trusted adult within the YSO community, and that the adult knew what to do and did it within the required timeframes as trained. Again, the focus is on the behaviors and skills that we would hopefully expect to be outcomes of the safe environment efforts. Certainly, there are more sophisticated analytic and research-oriented methods for determining program effectiveness, but the data described above can be collected with minimal effort. The more complex program effectiveness analyses should not be attempted without appropriate expertise and guidance.

In addition to an annual self-audit, it is strongly recommended that the policies and procedures themselves be evaluated periodically (every 2-3 years). This comprehensive analysis is primarily qualitative and is designed to interview individuals and groups who have carried out the various responsibilities described in the policies, and to get their feedback about how what is written

(and intended) is actually working in practice. The product of this analysis will be a document that assesses each functional area of the policies and makes recommendations for changes and updates to the policies and procedures that:

- Reflect the way a policy area or procedure has evolved in its practice that is contrary to what is written, but is working successfully
- Restructure the text to address weaknesses or failures in a policy and/or procedural area and make them more effective or efficient
- Strengthen and/or clarify policy sections or procedures
- Develop policies and procedures for new issues that emerge from the analysis

In this way, a YSO can identify the policy's strengths and weaknesses, uncover issues that were not anticipated or addressed adequately, and change/update them accordingly. Once updated, the areas of recommended improvement can be followed and observed for a period of time (say, 6 months) to determine their effect (and quality improvement) on the overall policy implementation.

In summary, measurement/data collection recommendations in a YSO's child protection framework can also serve to help to sustain the programs over time and should include:

- An annual self-audit to assess current state of the implementation, to include a checklist of the data to collect
- A comprehensive analysis of the organization's policies and procedures every 2 - 3 years designed to identify what is working in practice, what needs improvement, or what needs to be added to the policies and procedures in order to strengthen them
- A "continuous quality improvement" initiative that takes a subset of any identified policy or practice improvements, addresses them, follows their implementation for a period of time and issues a report.

Community Partnerships

Collaboration is "a mutually beneficial and well-defined relationship entered into by two or more organizations to achieve results they are more likely to achieve together than alone."⁷¹

Collaborative efforts between individual YSOs and local service providers in the community can be an effective means of preventing child maltreatment. Community partnerships for the welfare

⁷¹ Winer, M., & Ray, K. (1994). *Collaboration handbook: Creating, sustaining, and enjoying the journey* (p. 24). Saint Paul, MN: Amherst H. Wilder Foundation.

of children, and child protection coordinating committees or task forces, provide an organizational structure that allows community organizations like YSOs to work together with other local resources involved in meeting the needs of maltreated children and their families. A community-based effort can define roles and responsibilities, increase communication, provide guidance, identify gaps in services, and avoid duplication of effort, which enhances the efficient use of existing services and resources.

YSO efforts to create child abuse prevention programs can be strengthened by including an emphasis on building collaborative relationships with education and training, social service delivery, investigative/law enforcement, and child/youth advocacy expertise in the community. Some of these activities and agencies may include:

- Cooperative training and staff development programs for those who work with children and youth. These programs stress identifying, reporting, and preventing child/youth maltreatment; furnish information on professional roles and responsibilities; and offer opportunities for discussion of mutual interests and problems among professionals in various disciplines. YSOs that are building or strengthening their child abuse prevention frameworks can look to these community organizations to advise them on the training programs that will best meet their needs. In many cases, they can provide (or conduct) online and/or on-site staff and volunteer training, and are usually aware of existing programs in the local community where the YSO may be able to send its employees and volunteers to participate.
- Public schools also participate in various public awareness programs through parent-teacher groups and other school-community organizations. By increasing public sensitivity to child maltreatment, schools help to develop a cadre of concerned citizens who advocate for resources and programs for child abuse and neglect prevention. School personnel are among the many groups normally called upon to work together along with multiple agencies and professional disciplines to maximize the services available to the community. YSOs can contact their local school district, become familiar with these collaborations, increase their knowledge of local services, and participate in the efforts in the local community to protect children.
- Community partnerships are essential for building relationships, sharing expertise, accessing services, and building legitimacy and advocacy within the community. Some of the relevant Massachusetts organizations are the Department of Children and Families; regional Child Advocacy Centers; the District Attorneys Association; the Children's

Trust; the Department of Education; the Office of the Child Advocate; and local colleges, universities, community health centers and children's hospitals.

Community partnerships also foster more effective communications. In terms of considering a communications strategy for incidents or allegations of child abuse and neglect, it is important to remember that when actual instances of child abuse are uncovered, particularly child sexual abuse, they are seldom isolated. Experience (and research) shows that individuals who victimize children do so consistently and over long periods of time. When discovered, and within the bounds of any legal investigation and the privacy and reputation of the individuals involved, communications should promote the development of cooperative and open relationships. To that end, YSOs should communicate appropriately with the communities they serve, the general public, and members of the media regarding complaints of child abuse. Effective, transparent communication serves not only to legitimize the commitment to building safe environments, but also may enable others who suffered (or are suffering) similar abuse to come forward and identify themselves.

The Child Welfare Information Gateway has an excellent set of free user manuals dedicated to the creation of community partnerships to prevent child abuse and neglect on its website: (www.childwelfare.gov/pubs/usermanuals/partners/index.cfm). The preface of its introductory document speaks to the importance of community partnerships and the evolving nature of what we know about child abuse:

"The User Manual Series offers a foundation for understanding child maltreatment and the roles and responsibilities of various practitioners in its prevention, identification, investigation, and treatment. Through the years, the manuals have served as valuable resources for building knowledge, promoting effective practices, and enhancing community partnerships. Since the last update of the User Manual Series in the early 1990s, changes have occurred that dramatically affect each community's response to child maltreatment. The changing landscape reflects increased recognition of the complexity of issues facing children and families, new legislation, practice innovations, and systems reform efforts. Significant advances in research have helped shape new directions for interventions, while ongoing evaluations help us know "what works."

YSOs working to build or strengthen their child protection programs do not need to "go it alone." Because YSOs are part of the fabric of the communities in which they reside, community partnerships are one of the best ways to stay informed and to utilize the resources and expertise the partnerships represent – not only in terms of building safer environments in their own organizations, but also in partnering with the larger, societal efforts that address the issues of child abuse and neglect as a shared concern.

APPLYING THE FRAMEWORK: A FIVE-YEAR PLAN

APPLYING THE FRAMEWORK: A FIVE-YEAR PLAN

As a prevention strategy, the implementation of policies and practices that promote greater child safety in YSOs throughout the Commonwealth is both critical and achievable, and will rely on a multi-pronged approach over the next 5 years.

The Legislative charge to the Task Force calls for “...*the development of a 5-year plan for using community education and other strategies to increase public awareness about child sexual abuse, including how to recognize signs, minimize risk and act on suspicions or disclosures of such abuse.*” Since the focus of this report is on primary prevention (i.e., creating organizational and community interventions that can prevent abuse before it happens) and on building the capacity in YSOs throughout the state to not only prevent, but also to recognize, respond to, and report instances of child sexual abuse, it presents a logical framework within which to realize these longer-term implementation-oriented goals.

YSOs in their various forms exist in every community in the Commonwealth and serve their community’s children, youth and families. Therefore, the Task Force’s focus on developing guidelines and tools for the development of sexual abuse prevention and intervention plans; policies and procedures for the implementation and oversight of those guidelines; and strategies to incentivize organizations in doing so, fits in well with this approach. Better-informed YSOs can help to create better-prepared and safer communities.

Public awareness activities have always been an important part of an overall approach to addressing child abuse and neglect issues because such activities have the potential to reach diverse community audiences: parents, prospective parents, children, mandated reporters, YSOs and the community at large. In designing prevention education and public information activities, national, state, and local organizations have used a variety of media and methods to promote these activities. These include public service announcements on radio and television; Internet-based videos and educational programming; press releases; public events and meetings focused on various aspects of awareness and prevention; information kits and brochures, and posters.

The Task Force will use these and other tools to develop an implementation strategy designed to reach the multiple community audiences concerned with services to children and the prevention of their maltreatment. The accumulated evidence shows that neighborhood-based, child/youth-centered, family-focused child/youth protection and intervention strategies supported by strong YSO engagement and interagency collaboration work.

However, the challenge presented by the fact that YSOs range from small, single owner storefront businesses that function in a single community, to statewide, multi-site and multi-function organizations requires additional consideration. The following is a list of some, but not

all, of the YSOs operating in Massachusetts and serving the state's 1.4 million minor children and youth:

- After School Programs
- Youth Sports Programs
- Mentoring programs
- Residential School Programs
- Cultural Arts Programs
- Licensed Child Care
- Special Olympics
- Special Education Programs
- Girl and Boy Scouts
- YMCAs
- Boys and Girls Clubs
- Big Brothers and Big Sisters
- Public and Private Schools
- Schools (e.g., Parochial) Administered by Faith-Based Organizations
- Day and Overnight Camping Programs
- Academic Camps (e.g., robotics, writing, math)
- Religious Education Programs
- Tutoring Programs
- Dance and Gymnastics Programs
- Martial Arts Programs
- Hobby, Craft and Gaming Clubs

Although children and youth can be at risk in any one of these organizations or programs, their diversity precludes the possibility that a single prevention or intervention strategy will apply to all their safety and prevention needs. The Task Force has tried to account for this by presenting a comprehensive set of child and youth safety standards, practices and tools in each of the primary focus areas of the Report (policies and procedures, screening and hiring, codes of conduct and monitoring, safe physical and technology environments, responding and reporting, and training and education); establishing a set of minimum required safety standards in each area; and outlining a decision making process designed to aid YSOs of various sizes in determining how to craft child abuse prevention and intervention programs that best fit their needs, function, culture and responsibilities.

But the question of *how* such a diverse set of Massachusetts YSOs – many, presumably, without any legal or contractual requirement to, or experience in establishing a child or youth protection

program – will be able to access and implement the recommendations of this report remains a significant challenge. To meet this challenge, the Task Force proposes the following initiatives be accomplished over the next 5 years:

Community-Based Outreach

- Both prior to, and after this Report is released to the Legislature, the Task Force will conduct a series of regional outreach meetings/community forums with local YSO communities throughout the state. Efforts are already underway to contact appropriate community leadership, find an appropriate venue, and facilitate an initial “Pilot” meeting (currently being planned for June 2017 in the Northeast Region).
- Each community forum will invite representation from a variety of programs that serve children and youth in the region’s communities. Community leaders will partner with the Task Force representatives to send targeted invitations to a mixed group of attendees (e.g., large/medium/small YSOs, private businesses, small non-profit programs, independent programs, etc.) with different levels of knowledge, budgets and experiences.
- The purpose of the Pilot community forums will be for Task Force representatives to make a brief presentation to the attendees about the Report and its intent and recommendations and, by means of a facilitated listening session, ask them about initial impressions, feasibility, potential facilitators and barriers to implementation, and what they would need from the Task Force in terms of initial and ongoing support and availability to help with decision making and implementation.
- Due to the unprecedented scale of what we are proposing, the Task Force anticipates that the very small YSOs and small businesses may need the greatest amount of support and guidance. Their potential state-wide population, and unique needs and challenges – including the fact that many of them have likely never implemented a safety structure like this before – will undoubtedly require additional attention and focus during the first year of implementation and possibly beyond. Being aware of this, the Task Force will make a concerted effort to identify this specific target population in the community forums and reach out to them to gauge and support their specific needs.
- Each community forum will also provide an opportunity for initial training and education, and will contain a short presentation on child sexual abuse. However, the bulk of the time will be spent in small group discussion and feedback. Sessions are anticipated to run for 2-3 hours. Two pilot community forums should be enough to help inform the content, structure and efficiency of the forums that will follow throughout the state.

Accessibility of the Report

Another focus of the 5-year plan is to ensure that the Task Force Report is accessible to, and useable by a wide variety of end-user YSOs. As stated above, the Task Force Report is intended to address the development and sustainment of child abuse prevention and intervention plans and programming by a diverse set of YSOs throughout the state. This diversity will require distribution by a variety of means and publication in a variety of formats. The intent is to maximize the usefulness of the report – or sections of the report – for YSOs attempting to create an initial child protection structure (or attempting to assess their present safety structure against the recommendations and standards it contains).

- In addition to distribution of the complete legislative report, the Task Force will work to ensure that the Report is published in various, useable formats like handbooks, pamphlets and manuals, targeted at specific YSO communities and specific to their needs.
- Another way for the Report to be available to a diverse set of YSOs is to ensure it is put online on a state-of-the-art, instrumented software platform that allows users not only to look at the entire report, but also to identify the type of YSO they represent. The system can then use that information to automatically point the user to the pertinent sections of the report, and “customize” the presentation of the material, along with links to external organizations, sample forms and policies, tools, and training.

Statewide Child Abuse Prevention Training for YSOs

Expanding on the concept of the regional, community-based outreach model currently being developed to meet with the YSO communities throughout the state, and eventually utilizing the information generated by them, the Task Force will develop and pilot a child/youth sexual abuse prevention training program specific to YSOs.

- The pilot trainings will be used to refine the presentation materials, format, length and content of the training. After revision, the Task Force will work with community leadership to administer the training onsite in a series of regional training sessions.
- The Task Force will also consult with organizations that have produced effective, easy to use, high quality, online abuse prevention training resources and work to develop an online version of the training program. The goal will be to build a multi-level program that will be appropriate for YSOs of various sizes.
 - Upon signing in, a state-of-the-art platform can collect the demographic data needed for statistical analysis and reporting, and will allow learners to select the type of YSO they represent as well as their function (administration, manager, supervisor, employee, volunteer, parent, etc.).

- The training software can then “customize” the presentation with information relevant to the learner’s position, along with sample scenarios, state reporting requirements, links to relevant documents and external resources, a final exam and, upon completion, issue a certificate of training.

Incentivization and Accreditation

The Task Force will explore the feasibility and make recommendations about whether the Commonwealth should adopt formal requirements for the implementation of the child safety and sexual abuse prevention practices outlined in this report in YSOs throughout the state. A state-wide voluntary or mandated accreditation system for “Child-Safe Organizations” would be an unprecedented abuse prevention tool for Massachusetts, and would assist in building communities of practice where children and youth are less likely to be sexually abused. Likewise, if abuse is already taking place, such a system would make it more likely that the abuse will be discovered early and stopped.

- A visible symbol or certificate that indicates a YSO is implementing a set of child-safe policies and practices, to a recognized standard, is likely to be an incentive for organizations to comply with the requirements, and would serve to provide greater assurance and confidence to children, youth, parents and caregivers. Administration of the accrediting system would need to be accomplished by an agency using the guidelines, resources and tools contained in this report.
- Alternatives to state accreditation or certification will also be explored. For example, after a YSO participates in a regional outreach session and completes training, its leadership could be presented with a “YSO Pledge for Child Safety” that expresses, by means of their signature, the intent to comply with the safety and abuse prevention vision and standards expressed in the Task Force report (See Resources Section for example).

Public Awareness Campaign

Whether mandated to report suspected child abuse or not, child sexual abuse prevention is the responsibility of every adult in every community in the Commonwealth. However, many adults have no idea about what to do when they suspect a child is being harmed. Others may know what to do, but are hesitant to get involved or to say anything for fear of being wrong. Whatever the reason, the resulting silence allows the harm to continue, almost always with devastating consequences. Increasing public awareness about the existence of child sexual abuse, how it occurs, and what ordinary citizens can do to prevent or to stop it can help to lay the foundation for community and cultural change where the sexual abuse of children is less likely to occur.

To support this statement, comprehensive child sexual abuse prevention information must be as widespread and available as possible. As stated above, public awareness activities have always been an important part of an overall approach to addressing child abuse and neglect issues because such activities have the potential to reach diverse community audiences: parents, prospective parents, other caregivers, children, youth, and the community at large. Knowledge about child sexual abuse at the grass roots level provides a critical and necessary piece of the foundation for abuse prevention efforts.

- To enhance public awareness and support potential adult intervention where instances of inappropriate or harmful behavior towards children are observed or child abuse is suspected or disclosed, the Task Force will work to create a child sexual abuse prevention public awareness campaign with an emphasis on recognizing, responding and reporting.
- The campaign will utilize Public Service Announcements (PSAs) on radio, television and the Internet; short videos and educational programming; press releases; public events focused on various aspects of awareness and prevention; and other strategies to reach as much of the state's adult population as possible.

Sustainability Issues

The key to sustaining the desired outcomes of the 5-year plan is the extent to which Massachusetts YSOs, their families and their surrounding communities incorporate the child safety and abuse prevention principles contained in this Report as a shared responsibility. YSOs, community leadership and parents/caregivers must engage deliberately with one another in local prevention efforts for these initiatives to become self-sustaining at the community level. Parents must be incorporated as full partners in any YSO changes that involve the safety and well-being of their children, and all must remain persistent in the belief that the better the children and youth are protected, the more their community will thrive.

- The Task Force will work with YSOs, community leadership and parent/caregiver representatives to explore ways to support, strengthen and sustain this level of mutual engagement.
- As new YSOs and new parents emerge as part of the normal evolution of Massachusetts communities, the continued availability of training, education, and information concerning child maltreatment and its prevention will be critical and must be maintained.
- The Task Force will explore and make additional recommendations about the types and levels of continued state monitoring, implementation assistance, training support and oversight that would be appropriate to this task.

Outstanding Issues

There are some issues mentioned in this Report that the Task Force did not address fully, or addressed with caveats, or did not have time to address. As part of the 5-Year Plan, the Task Force will work to address these issues more fully and to issue them as an addendum to this Report. These issues include:

- Shifting the emphasis when addressing instances of Child-on-child and Youth-on-Youth sexual abuse and “consensual” sexual encounters among minors (so-called “Romeo and Juliet” relationships) from a judicial process focused on criminality and punishment to a multidisciplinary team approach focused on therapeutic intervention, family support and rehabilitation. The predominant research on recidivism in this area indicates that if identified and addressed early, and with this latter emphasis, 85-95% of the offending children/youth never reoffend. Thus, such an approach offers great promise as a preventive measure.
- The emerging area of the commercial sexual exploitation of children (CSEC).
- Children and youth with physical and intellectual disabilities and other special needs that render them more vulnerable to abuse and exploitation.
- A fuller treatment of children and adults in mentoring and other one-on-one relationships that would require special provisions in many of the Report’s requirements to accommodate.

Legislative Recommendations

It is the recommendation of this task force that legislation specific to the prevention of sexual abuse of children be pursued. While there are statutes specific to this purpose, there is need for deliberate refinement that will enable and equip those serving and working with children to help protect them from sexual abuse. Specifically, we recommend legislation in the following areas:

- The posting of abuse prevention information and actions in clearly visible and public locations in all public, and open-enrollment charter schools in the languages of those served.
 - Examples would include the school’s Code of Conduct and step-by-step instructions explaining what students and staff should do if inappropriate behavior or abuse is experienced, suspected, observed or disclosed.
- The inclusion or incorporation of a personal safety and sexual abuse prevention curriculum in all primary, middle school, and high schools (Pre-K to Grade 12) as part of their health education frameworks.

- Curriculum should be evidence based and developmentally sequenced (age appropriate) and selected or adapted with appropriate consultation.
- Focus should be on recognizing, responding to, and reporting boundary violating and other sexually offending behaviors to a trusted adult.
- The development and implementation of an online training program for the prevention, identification and reporting of child abuse, child sexual abuse, and the commercial sexual exploitation of children (CSEC) for all mandated reporters.
 - Training should be administered annually and augmented with information specific to the role and profession of the learner.
 - The training system should administer an examination to test content understanding and, upon successfully passing the examination, issue a certificate of completion.
 - Completion of mandated reporter training should be a prerequisite for renewal of licensure.
- The creation of a senior multidisciplinary team (MDT), focused on the review of any Massachusetts child abuse case where the child(ren) or family has/have experienced repeated entry into the care of the Department of Children and Families within any 12-month period.
 - The MDT should be chaired by the Office of the Child Advocate (OCA) and include DCF, the Children’s Trust, senior social workers and others the OCA determines as necessary.
- Strengthening collaborations between public and private child and youth serving agencies to expand in-home visiting and parent coaching programs for families with children from conception to age 5.
 - This type of programming is prevention-oriented and has been shown to reduce child maltreatment numbers while increasing the numbers of parents who have knowledge of positive parenting and child development.
 - Collaborations should be oriented toward expanding the evidence base by producing annual reports that evaluate the outcomes of these interventions and use them to develop the standards and regulations necessary for implementing high quality, effective in-home, parent coaching and home visiting programs.
- Every youth serving organization in Massachusetts (non-profit and for-profit) should ensure that they have a set of policies and procedures that are in accord with the contents of this Report.

- Policies should include ongoing training and education for administrators, supervisors and managers, staff, employees, contractors and volunteers; screening of prospective employees and volunteers; codes of conduct that identify appropriate and boundary-violating behaviors; monitoring, measurement and feedback to all staff; and assessment and modification of physical spaces and facilities to reduce opportunities for sexual abuse
- YSOs should make the information about their abuse prevention programs available to parents, guardians and other interested persons in the community.
- Before hiring, all schools and YSOs should obtain written permission and authorization for disclosure (along with records release, and a release from liability) by the applicant's current and former employers.
 - The disclosure should include inquiries about whether the applicant was the subject of any abuse or sexual misconduct investigation; has ever had a license revoked or suspended while (or after) being investigated for sexual misconduct; or was ever disciplined, discharged or non-renewed, asked to resign; or was otherwise separated from employment while (or after) allegations of sexual misconduct were being investigated.

APPENDICES

1. Definitions/Acronyms/Glossary
2. Legislative Mandate
3. Task Force Committees and Membership
4. Guest Presenters
5. Schedule of Meetings
6. Resources

Section Specific Appendices:

7. Policies and Procedures
8. Screening, Hiring and Licensing
9. Code of Conduct and Monitoring
10. Ensuring Safe Physical Environments and Safe Technology
11. Recognizing, Responding To, and Reporting Allegations and Suspicions
12. Training

APPENDIX 1

DEFINITIONS/ACRONYMS/GLOSSARY

Abuse: The non-accidental commission of any act by a caretaker upon a child under age 18 which causes, or creates a substantial risk of physical or emotional injury; or constitutes a sexual offense under the laws of the Commonwealth; or any sexual contact between a caretaker and a child under the care of that individual. This definition is not dependent upon location (i.e., abuse can occur while the child is in an out-of-home or in-home setting).

CAN: Child Abuse and Neglect

Caregiver: A child's parent, stepparent, guardian, or any household member entrusted with the responsibility for a child's health or welfare; or any other person entrusted with responsibility for a child's welfare, whether in the child's home, a relative's home, a school setting, a child care setting (including babysitting), a foster home, a group care facility, or any other comparable setting. As such "caregiver" includes, but is not limited to: school teachers, babysitters, school bus drivers, and camp counselors. The "caregiver" definition should be construed broadly and inclusively to encompass any person who at the time in question is entrusted with a degree of responsibility for the child. This specifically includes a caregiver (such as a babysitter) who is under age 18.

Child: a person under the age of 18. However, when a distinction needs to be made that differentiates younger and older minors by age or developmental stage, a child is defined in this report as an individual between newborn and age 11, and a youth is defined as an individual between age 12 and the attainment of their 18th birthday.

Code of Conduct, Professional Boundaries: A set process, procedure, policy or protocol regarding personal activity and responsibility as it pertains to the care of and interaction with children, youth and coworkers regarding the protection of children and youth from sexual abuse.

CORI: Criminal Offender Record Information

CSA: Child Sexual Abuse

CSAP: Child Sexual Abuse Prevention

CSEC: Commercial Sexual Exploitation of Children

DCF: Department of Children and Families

Emotional Injury: Is an impairment to or disorder of the intellectual or psychological capacity of a child as evidenced by observable and substantial reduction in the child's ability to function within a normal range of performance and behavior.

Employee: Anyone paid to work in an organization in any capacity, hourly or otherwise, on a regular basis, including part-time, summer, and administrative and maintenance staff.

Human Trafficking:⁷² A person who is subjected to harboring, recruitment, transportation, provision, obtaining, patronizing, or soliciting for the purpose of:

- Sex trafficking (i.e., inducement to perform a commercial sex act, forced sexual services and/or sexually explicit performance).
- Labor trafficking (i.e., forced services, involuntary servitude, peonage, debt bondage or slavery).

Inappropriate Conduct: Conduct which violates the physical or emotional boundaries of another, or puts the person or others at risk for violation or accusation of violation, whether intentional or unintentional.

Institutional Abuse or Neglect: Abuse or neglect which occurs in any facility for children, including, but not limited to, group homes, residential or public or private schools, hospitals, detention and treatment facilities, family foster care homes, group day care centers and family day care homes.

Neglect: Failure by a caretaker, either deliberately or through negligence or inability, to take those actions necessary to provide a child with minimally adequate food, clothing, shelter, medical care, supervision, emotional stability and growth or other essential care; provided, however, that such inability is not due solely to inadequate economic resources or solely to the existence of a handicapping condition. This definition is not dependent upon location (i.e., neglect can occur while the child is in an out-of-home or in-home setting).

Perpetrator: Any individual acting with deliberation to have a sexual encounter with a child/youth that is unwanted, coerced, forced or nonconsensual. This term also includes those who, by virtue of age, developmental disability, or other extenuating factor including

⁷² based on MGL c. 233, § 20M and MGL c. 265, §§ 50 and 51

diagnosable mental disease or defect, has sexually violated another person. This definition does not include those who are cognitively unaware of their actions.

Physical Injury: Death, or fracture of a bone, subdural hematoma, burns, impairment of any organ, and any other such nontrivial injury; or soft tissue swelling or skin bruising, depending on such factors as the child's age, circumstances under which the injury occurred, and the number and location of bruises; or addiction to a drug or drugs at birth; or failure to thrive.

Reporting: The requirement of an individual to report behavior which is not in alignment with the Code of Conduct to internal and/or external authorities.

Sexually Exploited Child:⁷³ Any person under the age of 18 who has been subjected to sexual exploitation because such person:

- Is the victim of the crime of sexual servitude pursuant to section 50 of chapter 265 or is the victim of sex trafficking as defined in 22 United States Code 7105.
- Engages, agrees to engage or offers to engage in sexual conduct with another person in exchange for a fee, in violation of subsection (a) of section 53A of chapter 272, or in exchange for food, shelter, clothing, education or care.
- Is a victim of the crime of inducing a minor into prostitution under section 4A of chapter 272.
- Engages in common night walking or common streetwalking under section 53 of chapter 272.

SORI: Sex Offender Record Information

Suspicious Behavior: Behavior that causes a reasonable, informed person to question the motives and intentions of the person involved.

Victim, Alleged Victim: Any individual who, as a child/youth, had a sexual encounter that was unwanted, coerced, forced or nonconsensual

Volunteer: Any person providing services to an organization in any capacity who does not receive pay, regardless of duration or frequency.

Youth: For purposes of this report and a youth is defined as an individual between age 12 and the attainment of their 18th birthday.

⁷³ as defined in MGL c. 119, § 21

Youth-on-Youth: Sexual activity between children, between youth, or between children and youth.

Youth Serving Organization (YSO): Establishments, organizations, facilities, small businesses and clubs that provide services and activities for children and youth. They include schools, medical and treatment facilities, youth groups, faith-based organizations, recreational and sporting clubs, mentoring services, and privately owned studios that provide instruction and skill-building (e.g., dance, karate, gymnastics, art, etc.) to name a few.

APPENDIX 2

LEGISLATIVE MANDATE⁷⁴:

SECTION 34. Chapter 431 of the acts of 2014 (as amended): AN ACT ESTABLISHING A TASK FORCE TO PROTECT MASSACHUSETTS CHILDREN AGAINST CHILD SEXUAL ABUSE.

Be it enacted by the Senate and House of Representatives in General Court assembled, and by the authority of the same as follows:

There shall be a task force on child sexual abuse prevention. The task force shall be co-chaired by the child advocate and the executive director of the Children's Trust and shall include: the attorney general or a designee; the lieutenant governor or a designee; the house and senate chairs of the joint committee on children, families and persons with disabilities; the house minority leader or a designee; the senate minority leader or a designee; the commissioner of public health or a designee; the commissioner of early education and care or a designee; the commissioner of children and families or a designee; the executive director of the Massachusetts office of victim assistance or a designee; the executive director of the Massachusetts District Attorneys Association or a designee; the director of the victim services unit of the sex offender registry board or a designee; the commissioner of elementary and secondary education or a designee; and representatives from each of the following child and youth service providers and advocacy organizations who shall be appointed by the governor: the Alliance of Massachusetts YMCAs, Inc.; the Massachusetts Society for the Prevention of Cruelty to Children; the Massachusetts Children's Alliance, Inc.; the Massachusetts Citizens for Children, Inc.; the Children's League of Massachusetts, Inc.; The Mass Mentoring Partnership, Inc.; the Girl Scouts; the Massachusetts Alliance of Boys & Girls Clubs, Inc.; the Massachusetts Association for the Treatment of Sexual Abusers, Inc.; the Massachusetts After School Partnership, Inc.; the Roman Catholic Archdiocese of Boston; and the Massachusetts Adolescent Sexual Offender Coalition, Inc. The governor may appoint additional representatives from agencies serving children, law enforcement, religious organizations and others as necessary to fulfill the purpose of the task force.

The task force shall develop guidelines and tools for the development of sexual abuse prevention and intervention plans by organizations serving children and youths. The task force shall recommend policies and procedures for implementation and oversight of the guidelines as well as strategies for incentivizing such organizations to develop and implement sexual abuse prevention and intervention plans. The task force shall also develop a 5-year plan for using community education and other strategies to increase public awareness about child sexual abuse, including how to recognize signs, minimize risk and act on suspicions or disclosures of such abuse.

⁷⁴ See: <https://malegislature.gov/Laws/SessionLaws/Acts/2014/Chapter431>

The task force shall periodically report on its activities and recommendations to the governor, the clerks of the house of representatives and senate, and the chairs of the joint committee on children, families and persons with disabilities and shall submit a final report on or before June 30, 2017.

APPENDIX 3

TASK FORCE COMMITTEES AND MEMBERSHIP:

Screening & Hiring & Licensing Committee

- * Nancy Scannell - Massachusetts Society for the Prevention of Cruelty to Children
- Marty Martinez – Massachusetts Mentoring Partnership
- Tara McGuire – Massachusetts District Attorneys Association
- Joan Tabachnick – Massachusetts Adolescent Sex Offender Coalition
- Tom Weber – Massachusetts Department of Early Education and Care
- Ardith Wieworka – Massachusetts Afterschool Partnership
- Diane Coffey – Massachusetts Office of Victim Assistance
- Jennifer Franco – Massachusetts District Attorneys Association
- Laurie Myers – Sex Offender Registry Board
- Judy Norton – Sex Offender Registry Board

Code of Conduct Committee

- *Charity Bell-Lewitt – Massachusetts Department of Mental Health
- Peter Doliber – Alliance of Massachusetts YMCA's
- Maureen Ferris – Children's Trust
- Rep. Susannah Whipps
- Chelsea Aquino – Massachusetts Mentoring Partnership
- Seth Yorra

Safe Environment Committee

- *Meghan McGuirk – Massachusetts Society for the Prevention of Cruelty to Children
- Carlene Pavlos – Massachusetts Department of Public Health
- Nancy Scannell – Massachusetts Society for the Prevention of Cruelty to Children
- Taneekah Johnson – Massachusetts Department of Public Health

Respond & Reporting Committee

- *Tom King – Massachusetts Children's Alliance
- Lori Ann Bertram – Department of Children and Families
- Edie Rathbone – Office of the Child Advocate
- Girl Scouts will give input

Training Committee

- *Anitza Guadarrama-Tiernan – Children's Trust
- Jack Miller – Children's Trust

Jetta Bernier – Massachusetts Citizens for Children
Marty Martinez – Massachusetts Mentoring Partnership
Diane Gauthier – Girl Scouts of Eastern Massachusetts
Tammy Mello – Executive Director, Domestic Violence, Lt. Governor’s Office
Patrice Provitola – Massachusetts Office for Victim Assistance (no longer serving on
Task Force)
Mark Bergeron-Naper – Department of Public Health

Youth-on-Youth Sexual Abuse (New Committee Established November 2016)

Shannon Moore – Senator Flanagan’s Office
Mark Bergeron-Naper – Department of Public Health
Joan Tabachnick – Massachusetts Adolescent Sex Offender Coalition
Abby Taylor – Office of the Attorney General

Legislative (New Committee Established November 2016)

Peter Doliber – Alliance of Massachusetts YMCA’s
Maria Mossaides – Office of the Child Advocate
Maureen Ferris – Children’s Trust
Anthony Rizzuto – Consultant to the Children’s Trust

*Committee Chair

APPENDIX 4
GUEST PRESENTERS (In order of consultation)

1. David Finkelhor, PhD, Director, Crimes Against Children Research Center, Co-Director of the Family Research Laboratory, and Professor of Sociology, University of New Hampshire.

Date: June 25, 2015

Topic: The Prevention of Child Sexual Abuse

2. Laurie Guidry, Psy.D., President, Massachusetts Association for the Treatment of Sexual Abusers.

Date: July 23, 2015

Topic: The Assessment, Treatment and Risk Management of Sexual Offenders

3. Lisa A. Fontes, PhD, University of Massachusetts Amherst Senior Lecturer & author.

Date: October 15, 2015

Topic: Cultural Competency

4. Sharman C. Nathanson, LICSW, Director of Mental Health and Advocacy Services, Children's Advocacy Center of Suffolk County;
Yvonne Spurling, Director of Clinical Services, DYS;
David Sullivan, Northwest District Attorney;
Ron Molin, Ph.D., Director, Forensic Services, Children's Charter, a division of Key, Inc.

Date: April 21, 2016

Topic: Panel Presentation and Discussion on Youth-on-Youth Sexual Abuse

5. Joan Duffell, Executive Director, Committee for Children, Seattle, WA

Date: May 5, 2016

Topic: Use of On-line Training and Technology in the Prevention of Child Sexual Abuse

6. Lisa Goldblatt-Grace, LICSW, MPH, Co-founder and Director of My Life, My Choice.

Date: November 17, 2016;

Topic: Preventing the Commercial Sexual Exploitation of Children.

**APPENDIX 5
SCHEDULE OF MEETINGS**

<u>Full Task Force Meetings*</u>			<u>Task Force Chairs Meetings</u>		
<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>2015</u>	<u>2016</u>	<u>2017</u>
30-Apr	21-Jan	19-Jan	9-Sep	7-Jan	5-Jan
28-May	18-Feb	16-Feb	7-Oct	4-Feb	2-Feb
25-Jun	17-Mar	16-Mar	4-Nov	3-Mar	2-Mar
23-Jul	21-Apr	18-May	2-Dec	6-Apr	3-Mar
20-Aug	19-May			5-May	6-Apr
24-Sep	15-Jun			2-Jun	4-May
15-Oct	18-Aug			1-Sep	1-Jun
22-Oct	15-Sep			6-Oct	
19-Nov	20-Oct			3-Nov	
10-Dec	17-Nov			15-Dec	
* Task Force Subcommittees met off-site, and at their own discretion					

**APPENDIX 6
RESOURCES**

CSA PREVENTION EVALUATION TOOL FOR ORGANIZATIONS⁷⁵

Child Protection Policy & Procedures

Sandy K. Wurtele, Ph.D. © 2014

General Standards	Yes
a. Policy is written in a clear and easily understood way. (Evidence: Copy of policy)	
b. Policy contains definitions of key terms (e.g., Sexual Abuse; Minor)	
c. Policy is publicized, openly displayed, promoted, and distributed to everyone involved with an organization. (Evidence: Circulation list to show distribution)	
d. States Purpose: Agency's commitment to create safe environments for children and protect them from harm (welfare/safety of youth is paramount; values children, youth)	
e. States Principles underlying standards: (e.g., all children have the right to protection and safety; equal rights to protection from harm; to an environment free from violence, abuse, harassment, and discrimination; treat each other with respect; Everyone has a responsibility to support the care and protection of children)	
f. Abuse-free, non-sexualized work environment. Zero tolerance for any form of abuse of youth, whether emotional, physical, or sexual.	
g. Policy is approved and endorsed by relevant management/oversight body (Evidence: signed statement of approval; excerpt from minutes of relevant meeting to show approval)	
h. Policy specifies to whom standards apply (e.g., mandatory for staff and volunteers)	
i. Developed in collaboration with many stakeholders (e.g., children, parents, law enforcement, legal counsel, experts, child protective services)	
j. Encourages collaboration between parents and program staff to keep children safe.	
k. Policy is reviewed/updated on regular basis. (e.g., every three years or whenever there is a major change in the organization or relevant legislation) (Evidence: Timetable for review)	
l. Processes/mechanisms are in place to consult children and parents as part of the review of safeguarding policies and practices. Steps are taken to seek users' views on policies and procedures and how they are working.	
m. Identifies personnel with clearly defined role and responsibilities in relation to child protection. Person(s) responsible for implementing/reviewing policy and procedures.	

⁷⁵ Reproduced in this Report with Author's permission

n. Information about where to go for help and contact details for designated contact person, local social services department, police, and emergency medical help are readily available.	
Standard 1: Safe Screening and Hiring Practices	
a. There are policies and procedures for recruiting personnel and volunteers and assessing their suitability to work with children. (Evidence: Copy of Recruitment Policy & Procedure)	
b. Agency has a standard written application form. (Evidence: application form)	
c. Criteria for acceptance/rejection have been identified. Lists non-negotiable minimum standards for rejection/which offenses automatically disqualify applicants. (e.g., history of CSA? violence? substance-related problems? use of child pornography? major mental disorders? prior inpatient psychiatric treatment?)	
d. Person(s) responsible for screening, interviewing, reference checks, hiring, etc. have been identified.	
e. Policies and processes for screening and selection are stated and systematically followed.	
f. All adults who have the opportunity for regular contact with children, or who are in positions of trust, are screened.	
g. Applicant signs a permission form for contacting at least 2 personal references and performing a criminal background check.	
h. Applicants are asked to disclose previous criminal histories of sexual offenses, violence against youth, and other criminal offenses. All candidates are asked if there has ever been any investigation or action taken against them for any ethical, moral, legal, or malpractice action. Have you ever been censured, disciplined, dismissed, expelled from, been put on probation, or been requested to resign or withdraw from any professional school, internship, volunteer program, employment, or training program?	
i. Reference checks are conducted, with all work/volunteer experience carefully verified.	
j. Verbal contact is made not only with the people listed on the application, but also people mentioned by those references.	
k. Criminal background checks are conducted with fingerprinting if applicable, and Sex Offender Registries are checked.	
l. Agency keeps the results of criminal background checks confidential (secure storage location, limited access to files).	
m. Informal Internet searches are conducted as a way to find additional relevant information about an applicant.	
n. Code of Conduct is shared with all applicants.	
o. Applicants' home environments are assessed (for mentoring programs where youth meet with mentors at their homes)	
p. No contact with youth is allowed until applicant has been approved.	
q. Agency lets applicants know (verbally and in writing) that the program's priority is the safety and well-being of children.	

r. There is an induction process for all staff and volunteers which includes familiarization with the child protection policy and procedures.	
Standard 2: Code of Conduct	
a. Contains input from constituents: Staff, parents, youth are consulted in developing codes of behavior. Specifies disrespectful/unsafe/harassing behaviors (i.e., makes it clear that discriminatory behavior or language in relation to any of the following is not acceptable: race, culture, age, gender, disability, religion, sexual orientation, or political views). Evidence: Code of Conduct specifically prohibits certain behaviors (hitting or physically assaulting children; having intimate, romantic, or sexual relationships with children; showing porn to children; exploiting children to meet emotional or sexual needs; asking youth to keep secrets)	
b. Written Code of Conduct, which provides clear guidance on acceptable/expected standards of behavior of adults toward children. (Evidence: Code of Conduct for adult-child behavior and for child-child behavior)	
c. Agency lists ethical conduct/appropriate behaviors (behaviors to be encouraged). (Evidence: Guidance on acceptable/appropriate behaviors)	
d. Agency lists unethical conduct/inappropriate behaviors or boundary violations.	
e. Clear statement of the need to set and maintain professional/appropriate boundaries with youth.	
f. Policy addresses one-on-one interactions with youth (e.g., being alone with a child in an area that cannot be seen or observed by other adults; taking children to your own home, to restaurants, or traveling alone with a child in a car)	
g. If applicable, policy addresses high-risk situations (e.g., bathing, changing, bathroom activities, sleep-overs)	
h. Policy addresses out-of-program contact restrictions (e.g., socializing with youth outside of agency-sponsored activities).	
i. Addresses discipline practices (that do not involve physical punishment or any other form of degrading or humiliating treatment). States responsibility of adults and children to treat one another with dignity and respect.	
j. Adequate adult/child ratios. Clear guidelines that specify under what circumstances--if any--staff are allowed to be alone with a child.	
k. Describes responsible use of the Internet	
l. Addresses taking photographs/videos of youth (including mobile phones with cameras)	
m. Provides guidelines on contacting/communicating with youth via technology (use of social media, emails, mobile phones)	
n. Guidelines regarding communication/language with children. (e.g., self-disclosure; personal/intimate topics; secrecy; sexual topics), and conduct (inappropriate gift giving)	
o. Prohibits the display or distribution of sexually suggestive or pornographic material	
p. Policy regarding transporting students/youth.	
q. Policy outlaws use, possession, or distribution of illegal or unauthorized drugs. Furnishing or encouraging minors to use, possess or unlawfully distribute alcohol,	

tobacco, illegal or unauthorized drugs.	
r. Code contains guidelines relating to adult-child physical contact.	
s. Code outlines Sanctions for Breaching: (e.g., Contains a statement "I have read and understand the Policy and agree to be bound by the provisions contained within. I understand that violations involving sexual relations with a student, sexual abuse of a student, or communication with a student of a sexual or romantic nature, shall result in dismissal, prompt notification of law enforcement and social services if required by state law, and in the case of an employee or volunteer licensed by a Board of Professional Licensing, the initiation of a complaint against the license.")	
t. Applicant signs/dates statement "I agree to abide by/adhere to Code of Conduct".	
u. Arrangements are in place to monitor compliance with child protection policies and procedures.	
Standard 3: Implementation and Monitoring	
a. Written plan showing what steps will be taken to keep children safe, who is responsible for implementing these measures, and when/how often monitoring will occur. (Evidence: Copy of the Child Protection Plan)	
b. Defines roles and responsibilities for implementing Plan and for monitoring both implementation and interactions between youth and adults.	
c. Audit procedures are in place for monitoring the extent to which policies and procedures and all training programs are being implemented (method of demonstrating accountability and transparency).	
d. Documentation that monitoring has occurred (using written records).	
e. Uses formal supervision including periodic evaluations (e.g., annual appraisal of staff, review of volunteers)	
f. Uses informal supervision (random observations)	
g. Institutional climate encourages professionals and volunteers to keep their eyes open for potentially problematic adult-youth interactions and share their concerns with and confront a colleague about those concerns.	
h. Agency provides therapeutic supervision (i.e., encourage and support the recognition of personal needs like loneliness and how they may be affecting professional relationships; acknowledging emotional/sexual feelings toward clients; climate of trust in which staff feel free to disclose feelings and experiences to their supervisors)	
i. Agency provides multiple opportunities for youth and staff to give/obtain feedback and seek support (e.g., peer mentoring)	
j. All incidents, allegations of abuse and complaints are recorded and monitored. (Evidence: Summary of number of incidents of abuse and number of complaints)	
Standard 4: Ensuring Safe Environments	
a. Ensure spaces are open and visible (windows in doors; "no-closed door" policy)	
b. Provide youth with privacy when toileting, showering, changing clothes.	
c. Install surveillance cameras in difficult-to-supervise public areas.	

d. Parents are allowed/encouraged to visit the agency unannounced at any time	
e. Policies in place for field trips/off-site activities.	
f. Transportation policies established and monitored.	
g. Zero-tolerance/abuse-free/anti-bullying policies are advertised throughout environment. Youth safety is priority.	
h. Child protection policy is openly displayed and available to everyone, and is included in staff handbooks along with student and parent handbooks.	
i. Children are aware of their right to be safe from abuse and who to speak to if they have worries or concerns.	
j. Agency creates a climate that encourages guardians/staff to question concerning or confusing behaviors or practices.	
Standard 5: Investigating & Reporting Concerns, Disclosures, Allegations	
a. Purpose: Provides clear guidance on what to do when a child protection concern arises.	
b. Goal: to respond quickly and appropriately to 1) inappropriate or harmful behavior, 2) violations of any policies, and 3) allegations and suspicions of harassment and sexual misconduct.	
c. All employees and adult volunteers are aware of their obligation to report suspected abuse or neglect. (e.g., Priests are clear that the Seal of Confession does not apply to disclosures of abuse or abusive behavior.)	
d. All employees and adult volunteers are trained in recognizing obvious signs and symptoms of abuse but also more subtle signs (crossing boundaries; grooming behaviors)	
e. All adults are trained in how to respond to a child who discloses abuse or questionable behavior. (List of do's and don'ts)	
f. Staff, parents, and youth know how to report concerns, suspicions, and allegations about unacceptable behavior.	
g. Youth have opportunities to report/describe concerning behavior directly and indirectly (e.g., a suggestion box to make complaints). Children are provided with information on where to go to for help and advice in relation to abuse, harassment and bullying. (Evidence: Copies of information for children about sources of support)	
h. Clear written procedures provide step-by-step guidance on what action to take if there are concerns, allegations, suspicions, or disclosures of abuse (historic or current).	
i. There is a designated person/person(s)/officer (Designated Officer and Deputy Officer if possible) (key point of contact) with clearly defined role and responsibilities for receiving complaints, reports, suspicions, or concerns.	
j. Chain of Reporting clearly described. Includes Designated Officer passes information on to Civil authorities. Contact details for local social services and police are included. (Evidence: Flow chart)	
k. Designated Officer consults with Child Protective Services/Law Enforcement about all allegations/disclosures.	

l. Process for recording all incidents, allegations, concerns, suspicions and referrals and storing these securely and maintaining confidentiality. (Evidence: Child Protection Recording Form; General Incident Reporting Form)	
m. Process for dealing with complaints made by parents and children about unacceptable and/or abusive behavior, with clear time tables for resolving the complaint.	
n. There is guidance on confidentiality and information-sharing which makes clear that the protection of the child is the most important consideration.	
o. Clearly stated guidelines for conducting an internal evaluation of complaint (of limited scope). Delineates what behaviors the agency will respond to internally and what behaviors require reporting to authorities.	
p. Maintain Records: Every referral should be documented, and a file should include a log of actions, events and information received. Any information/observations in connection with the case should be documented and included in the personnel file.	
q. Identifies who has responsibility for contacting the family of alleged victim and describes if, how, when, and by whom all families are notified.	
r. Provides guidance on how to respond to a child who is suspected to have been abused.	
s. Arrangements for providing supervision and support to staff and volunteers during and following an incident or allegation. Provides information and support to individuals both during and following an incident or allegation of abuse. Provides referrals, reimbursement for counseling, restorative justice, a list of professionals and organizations that provide assistance. (Evidence: List of contacts for advice, information, therapy)	
t. Clear guidance for responding to media/press.	
u. Clear plan for making public apologies.	
Standard 6: Training/Educational Programs	
a. Agency has developed and implemented educational programs specifically designed for youth, parents, professionals in training, and staff/administrators and volunteers who have significant contact with children. (Evidence: Copy of training plans/programs)	
b. All groups are educated about all forms of child maltreatment and in-depth coverage on sexual exploitation (causes, signs and symptoms, debunk myths about offenders, consequences of abuse, grooming behavior)	
c. Training includes discussion of need for and guidance in how to establish and maintain professional boundaries with youth. (Almost all serious ethical infractions emerge from a context of escalating boundary violations.)	
d. Training of professionals includes discussion of how personal problems, needs, deficits, can result in over-involvement (boundary violations) with needy youth. Acknowledge power differential between adults and youth.	
e. Provides guidance in spelling out/setting boundaries and limits with youth. Trainees have opportunities to discuss and role play risky situations.	
f. Discussions about how sexual misconduct can have its beginnings in good intentions (need to save a child from pain, risk of taking on the role of various or parent surrogate), easy to cross boundaries. Help trainees recognize ethical conflicts and provide practice	

in responding to sexual behaviors of youth.	
g. Opportunities for careful self-examination/training in recognizing when personal needs or unresolved problems are affecting work (e.g., addictions, pressures of work/home, loneliness, need for physical contact, for belonging, adoration, connecting)	
h. Recognizing the rationalizations/cognitive distortions adults use to construe deepening involvement as something other than sexual misconduct (e.g., good for the child). Victim sensitization approaches can make it difficult for trainees to deny the harmful effects that sexual relationships have on clients/mentees.	
i. Provide candid testimonials from respected faculty/administrators who have encountered strong (sexual) feelings for their clients (serve as models for how to engage in an open, professional discussion of sexual issues)	
j. Discuss the need to prevent sexual feelings from evolving into ethical infractions. (Draw the line between feelings and actions)	
k. Help staff recognize and intervene when they observe a co-worker crossing professional boundaries (e.g., taking a student to lunch or dinner, giving gifts).	
l. All groups are informed about duty to report sexual misconduct.	
m. Training includes a means of confirming participation and completion.	
n. Training is given before interactions with children begin, and is repeated every _ years.	

Contact information: Sandy K. Wurtele, Ph.D.
University of Colorado, Colorado Springs
Phone: (719) 255-4150; E-mail: swurtele@uccs.edu
Website: www.sandywurtele.com

OTHER COMPREHENSIVE RESOURCES

“Preventing Child Sexual Abuse Resources” (2016). The National Sexual Violence Resource Center. This collection of online resources provides information and tools for caretakers, organizations and communities assuming the responsibility of preventing child sexual abuse. (<http://www.nsvrc.org/projects/child-sexual-assault-prevention/preventing-child-sexual-abuse-resources#Organizations%20Schools%20Communities>).

“Safe-Child Standards Resource Bank” (2013). New Jersey Department of Children and Families. (<http://www.nj.gov/dcf/about/divisions/dfcp/safe.child.standards.NJ.Resource.Bank.pdf>).

SAMPLE SELF-AUDIT FORM FOR YSOs
(Adapt as Needed)

1. Does the YSO have a safe environment policy in place that includes key strategies addressing increased visibility, adequate supervision and controlled access – and are the policies and procedures for child and youth safety publicized to all personnel?

YES NO

- **If Yes, describe the types and frequency of publication.** (Examples might include publication in agency bulletins, information provided at staff meetings, brochures and/or posters in the vestibules of agency buildings.)
- **If No, provide explanation.**

2. a) Do all YSO leaders, employees, and volunteers know when, how, and to whom to report suspicions or allegations of abuse of a minor?

YES NO

- **If No, provide explanation.**

b) Reporting procedures also exist for cases in which the alleged abuser is not, or is no longer affiliated with the school.

YES NO

- **If No, provide explanation.**

3. a) Does the YSO have a Code of Conduct in place that outlines clear expectations for interactions between adults and students?

YES NO

b) Are copies of the code of conduct made available to YSO staff, volunteers and any other paid or non-paid personnel in positions of trust who have regular contact with children and youth?

YES NO

- **If No, provide explanation.**

c) Are copies of the Code of Conduct made available to parents and other members of the YSO community?

YES NO

- **If No, provide explanation.**

d) Have all staff, employees and volunteers signed a Statement of Receipt and Agreement indicating that they have read the Code of Conduct and agree to comply with the policies?

YES NO

- **If No, provide explanation.**

4. Is safe environment training provided to all YSO staff and volunteers to help them recognize, respond to, and report child abuse and neglect?

YES NO

- **If No, provide explanation.**

5. a) Does the YSO have a screening and hiring process in place that includes a written application, personal interview, reference check, criminal background check, and sex offender registry check?

YES NO

- **If No, provide explanation.**

b) Does the YSO repeat the criminal background and sex offender registry checks at least (insert “annually” or another agreed upon/required timeframe in accordance with MA state law)?

YES NO

- **If No, provide explanation.**

c) Does YSO leadership verify that background and criminal history checks are conducted by organizations for contractors, vendors, consultants and others who provide goods and services to the YSO (in the presence of minors) or who bring minors onto YSO property?

YES NO

- **If No, provide explanation.**

6. Families are provided with materials on a regular basis to let them know about child abuse and neglect, and the YSO’s abuse prevention plan that is designed to protect their children.

YES NO

- **If No, provide explanation.**

7. Partnerships with local child protection agencies are developed and active.

YES NO

- **If No, provide explanation.**

8. The YSO’s child protection plan is audited on a regular basis (at least annually), results are communicated to all stakeholders, and each audit’s results inform plans for continuous improvement.

YES NO

- **If No, provide explanation.**

Name of the person completing this agency self-assessment: _____

Title: _____

Date: _____

SAMPLE CHILD SAFETY INCIDENT AFTER-ACTION REPORT

This form is intended to collect information about incidents in violation of the (Name of YSO) Policies and Procedures for child and youth safety, boundary violations, disclosures of abuse, child/youth safety concerns or other behaviors or allegations of behavior that led to the suspicion that a child/youth in our care was being or was in danger of being harmed. The information in this report will be used in the ongoing analysis of our policies, training, and responsibilities to keep our children and youth safe. As such, the children or youth that are the subject(s) of the information do not need to be identified by name.

NOTE: This form is for statistical analysis only and does not substitute for an individual's responsibility to report incidents of suspected child abuse or neglect to (Organization name) or to DCF.

1. Date of incident(s)/behavior(s): _____

2. Number of children/youth involved _____

3. Ages and gender of children/youth involved _____

4: Description of incident(s)/behavior(s): (attach additional sheets as needed)

5. How did the situation come to your attention?

Child self-disclosed _____

Employee observed _____

Employee suspected _____

Volunteer observed _____

Volunteer suspected _____

Other individual disclosed, observed or suspected _____

Who? _____

6. Who did the report/incident involve?

Family member _____

Another child/youth _____

Staff member _____

Volunteer _____

Stranger _____

Other_____

7: Was the incident reported to (Name of internal reporting authority)?

Yes_____

Immediately_____ Within 24 hours_____ Other_____

No (please explain) _____

8. Was phone contact with DCF made?

Yes_____

Immediately_____ Within 24 hours_____ Other_____

No (please explain) _____

9. Was a written report (51A) filed within 24 hours of the phone contact with DCF?

Yes_____

Immediately_____ Within 24 hours_____ Other_____

No (please explain) _____

10: Is there any way we at (Name of organization) can improve our response in situations like this?

Yes_____

Refresher training_____, Assist with parents_____, More on-site technical assistance_____,
Other (please explain) _____

No_____

11: Is there any way we can prevent situations like this from happening in the future? _____

12: Any other comments/observations? _____

YSO Pledge for Child Safety

For the Prevention of Child Sexual Abuse in Youth Serving Organizations in the Commonwealth of Massachusetts

I pledge to associate my youth serving organization with the best practices for forming and providing ongoing awareness of the prevention of child sexual abuse, drawing upon the vision and standards as expressed in the report of the Massachusetts Legislative Task Force on the Prevention of Child Sexual Abuse entitled “*Guidelines and Tools for the Development of Child Sexual Abuse Prevention and Intervention Plans by Youth-Serving Organizations in Massachusetts.*”

I pledge to use the tools and sample documents provided, and/or to develop to the best of my ability, in collaboration with my staff, volunteers and parents:

- a set of child safety policies and procedures
- a code of conduct for staff and volunteers
- screening, hiring and supervisory practices consistent with the report’s recommendations
- guidelines for a safe physical environment and safe technology use
- guidelines for responding to and reporting suspected, observed, or disclosed instances of abuse and neglect
- access to training and education programs and materials about child sexual abuse

All documents will be posted, or available for review by staff, volunteers, clients, and parents.

I commit myself, my staff and my organization to do all in our power to protect the children in our care against child maltreatment, and to comply with all actions required by the child abuse reporting laws of the Commonwealth of Massachusetts.

Signed: _____ Title: _____ Name of Organization: _____ _____ Date: _____	Co-chairs of the Massachusetts Legislative Task Force on the Prevention of Child Sexual Abuse: _____ _____ Date: _____
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REPORTING CHILD ABUSE AND NEGLECT

(See also the 51A Report Form and DCF contact information in Appendix 11 below)

Child Welfare Information Gateway

Children's Bureau/ACYF
Eighth Floor
1250 Maryland Avenue, Southwest
Washington, DC 20024-2141
Toll-free: 1-800-394-3366
Telephone: 703-385-7565
Fax: 703-385-3206
Internet: <http://www.childwelfare.gov>

Provides toll-free and local telephone numbers for reporting child abuse and neglect in each state. In most cases the toll-free numbers listed are only accessible from within the state. Also listed are links to state web sites, which may provide additional information.

Childhelp USA

Suite B
15757 North 78th Street
Scottsdale, Arizona 85260-1629
Hotline: 1-800-4-A-CHILD (1-800-422-4453)
Telephone: 480-922-8212
Fax: 480-922-7061
Internet: <http://www.childhelp.org>

Staffed 24 hours daily by professional crisis counselors, this confidential Hotline is accessible throughout the U.S., its territories, and Canada. Through interpreters, communication is possible in 140 languages.

National Center for Missing & Exploited Children® (NCMEC)

Charles B. Wang International Children's Building
699 Prince Street
Alexandria, Virginia 22314-3175
Hotline: 1-800-THE-LOST® (1-800-843-5678)
TTY: 1-800-826-7653
Telephone: 703-224-2150
"Phone free" from Mexico: 001-800-843-5678

From other countries: 001-703-522-9320

Fax: 703-224-2122

Internet: <http://www.missingkids.com>

CyberTipline: <http://www.cybertipline.com>

NetSmartz: <http://www.NetSmartz.org>

The National Center for Missing & Exploited Children serves as a clearinghouse of information about missing and exploited children. It provides technical assistance to the public and law-enforcement agencies; distributes photographs of and descriptions about missing children worldwide; and coordinates child-protection education and prevention programs, training, and publications.

National Center for Victims of Crime (NCVC)

Suite 480

2000 M Street, Northwest

Washington, DC 20036-3307

Toll-free: 1-800-FYI-CALL (1-800-394-2255)

TTY: 1-800-211-7996

Telephone: 202-467-8700

Fax: 202-467-8701

Internet: <http://www.ncvc.org>

E-mail: gethelp@ncvc.org

NCVC offers help, information about options, and referrals to local services anywhere in the country.

NetSmartz (www.netsmartz.org)

The National Center for Missing & Exploited Children's website about internet and technology safety — for parents, teens, and educators.

Adverse Childhood Experiences (ACE) Study.

The ACE Study is one of the largest investigations ever conducted to assess associations between childhood maltreatment and later-life health and well-being. The study is a collaboration between the Centers for Disease Control and Prevention and Kaiser Permanente's Health Appraisal Clinic in San Diego. <http://www.cdc.gov/ace/index.htm>

PREVENTION ORGANIZATIONS

National Alliance of Children's Trust and Prevention Funds (ACT)

Michigan State University Department of Psychology

East Lansing, MI 48824-1117

Phone:(517) 432-5096

Fax:(517) 432-2476

e-mail:millsda@msu.edu

Web site: www.ctfalliance.org

Assists state children's trust and prevention funds to strengthen families and protect children from harm.

National Children's Alliance

516 C Street, NE

Washington, DC 20002

Phone: (202) 548-0090 or (800) 239-9950

FAX: (202) 548-0099

Web site: www.nationalchildrensalliance.org

Provides training, support, technical assistance and leadership on a national level to local children's and child advocacy centers and communities responding to reports of child abuse and neglect. A children's advocacy Center is a child-focused, facility-based program in which representatives from many disciplines, including law enforcement, child protection, prosecution, mental health, medical and victim advocacy, and child advocacy, work together to conduct interviews and make team decisions about investigation, treatment, management and prosecution of child abuse cases.

Committee for Children

568 First Avenue South, Suite 600

Seattle, WA 98104-2804

Phone: (800) 634-4449 ext. 200

Fax: (206) 438-6765

E-mail: info@cfchildren.org

Web site: www.cfchildren.org

Provides award-winning social skills curricula for the prevention of child abuse, bullying, and youth violence, as well as family education, training and technical assistance to educators throughout North America.

Crimes Against Children Research Center

University of New Hampshire

20 College Rd.

#126 Horton Social Science Center

Durham, NH 03824

e-mail: kelly.foster@unh.edu

Phone: (603) 862-1888

Fax: (603) 862-1122

Web site: www.unh.edu/ccrc/

The mission of the Crimes against Children Research Center (CCRC) is to combat crimes against children by providing high quality research and statistics to the public, policy makers, law enforcement personnel, and other child welfare practitioners. CCRC is concerned with research about the nature of crimes including child abduction, homicide, rape, assault, and physical and sexual abuse as well as their impact.

The Safer Society Foundation

P.O. Box 340, Brandon, VT 05733-0340

Office: 802.247.3132

Fax: 802.247.4233

Website: www.safersociety.org

Call for a referral to a local treatment provider for a child, adolescent or adult with sexual behavior concerns. (M-F, 9–4:30 p.m. ET). Also provides publications for youth or adults with sexual behavior problems, their families, survivors, treatment providers, and mandated reporters. Call for a free catalogue.

Child Molestation Research and Prevention Institute

P.O. Box 7593, Atlanta, GA 30357

Office: 404.872.5152

Website: www.childmolestationprevention.org

Online directory for sex-specific therapists for evaluation and treatment. Extensive reading lists for parents of children with sexual behavior problems and parents of victims, for professionals, adults with sexual behavior concerns, adults molested as children and their partners.

The Association for the Treatment of Sexual Abusers (ATSA)

4900 SW Griffith Drive, Suite 274, Beaverton, OR 97005

Office: 503.643.1023

Fax: 503.643.5084

Email: atsa@atsa.com

Website: www.atsa.com

A national organization developing and disseminating professional standards and practices in the field of sex offender research, evaluation, and treatment. Call or email for a referral to a local treatment provider.

National Center on Sexual Behavior of Youth

940 N.E. 13th St., 3B-3406, Oklahoma City, OK 73104

Office: 405.271.8858

Website: www.ncsby.org

Information concerning sexual development and youth with sexual behavior problems.

National Center for Victims of Crime (NCVC)

2000 M St., NW, Suite 480, Washington, DC 20036

Office: 202.467.8700

Fax: 202.467.8701

Toll-free: 1.800.FYI.CALL (1.800.394.2255)

TDD: 1.800.211.7996

Email: webmaster@ncvc.org or gethelp@ncvc.org

Website: www.ncvc.org

An information and referral center for victims. Through its database of over 30,000 organizations, NCVC refers callers to services including crisis intervention, research information, assistance with the criminal justice process, counseling, support groups, and referrals to local attorneys in victim-related cases.

Childhelp USA

National Child Abuse Hotline: 1.800.4.A.CHILD
(1.800.422.4453)
Website: www.childhelpusa.org

Provides a broad continuum of programs that directly serve abused children and their families. Adults and children can request local telephone numbers to report cases of abuse or access crisis intervention, information, literature, and referrals to thousands of emergency, social service, and support resources. All calls are anonymous and confidential.

The Centers for Disease Control and Prevention

1600 Clifton Road Atlanta, GA 30329-4027
800-CDC-INFO (800-232-4636), TTY: 888-232-6348
Email CDC-INFO
Website: www.cdc.gov

CDC works 24/7 to protect America from health, safety and security threats, both foreign and in the U.S. Whether diseases start at home or abroad, are chronic or acute, curable or preventable, human error or deliberate attack, CDC fights disease and supports communities and citizens to do the same.

Massachusetts Prevention, Assessment, Treatment and Reporting Resources

[Massachusetts Department of Children and Families](#)

600 Washington Street, 6th Floor
Boston, MA 02111
Phone 617-748-2000
Fax 617-261-7435
Child-At-Risk-Hotline (24-hour)
800-792-5200
(www.mass.gov/DCF)

[Office of the Massachusetts Child Advocate](#)

One Ashburton Place, Fifth Floor
Boston, MA 02108
Phone: (617) 979-8374
Complaint Line: (617) 979-8360
Toll Free: (866) 790-3690
Fax: (617) 979-8379
Email: childadvocate@state.ma.us
(www.mass.gov/childadvocate/)

[The Children's Trust](#)

55 Court Street, 4th Floor
Boston, MA 02108
Phone: 617-727-8957
Toll Free: 1-888-775-4KID
Fax: 617-727-8997
(www.childrenstrustma.org)
Parenting information: www.onetoughjob.org
Email: info@childrenstrustma.org

[Higher Education Center for Alcohol and Other Drug Prevention Educational Development Center](#)

55 Chapel Street
Newton Massachusetts 02458
Phone: 800-676-1730
Fax: 617-928-1537
(higheredcenter.ed.gov)

[Jane Doe, Inc. The Massachusetts Coalition Against Sexual Assault and Domestic Violence](#)

14 Beacon Street, Suite 507
Boston Massachusetts 02108
Phone: 617-248-0922
Fax: 617-248-0902
Information on Sexual Assault Centers: http://www.janedoe.org/find_help/search
(www.janedoe.org)

[Stop It Now!](#)

351 Pleasant Street - Suite B #319
Northampton Massachusetts 01060
Phone: 413-587-3500
Fax: 413-587-3505
(www.stopitnow.org)

[Wellesley Centers for Women \(WCW\)](#)

106 Central Street
Wellesley Massachusetts 02481
Phone: 781-283-2500
Fax: 781-283-2504
(www.wcwonline.org)

[Massachusetts Adolescent Sex Offender Coalition \(MASOC\)](#)

70 North Summer Street
Holyoke, MA 01040

Phone: (413) 540-0712
Fax: 413-540-1915
info@masoc.net
(www.masoc.net)

[The Massachusetts Association for the Treatment of Sexual Abusers \(MATSA\)](#)

PO Box 975
Montague, MA 01351
Phone: (413) 427-6903
E-mail: lregdry@gmail.com
(www.matsa.info)

[Children's Charter Trauma Clinic](#)

Out-patient clinic for victims of trauma and their families.
77 Rumford Ave.
Waltham, MA 02453
(781) 894-4307
(www.key.org/childrencharter.asp)

[The New England Adolescent Research Institute \(NEARI\)](#)

70 North Summer St.
Holyoke, MA 01040
Office: (413) 540-0712
Fax: (413) 540-1915
Website: www.nearipress.com

Massachusetts Children's Alliance and Regional Children's Advocacy Centers

Mission:

The Massachusetts Children's Alliance is a membership organization that promotes an integrated, multidisciplinary team response to child abuse. The Chapter is committed to strengthening collaboration and fostering systemic and societal change to protect children. Through support of member organizations, the Chapter ensures that children and families have access to high quality, comprehensive, specialized and culturally competent services of a Children's Advocacy Center.

State Chapter

Massachusetts Children's Alliance
14 Beacon Street, Suite 504
Boston, MA 02108
Phone: 617-573-9800
Fax: 617-573-9832

www.machildrensalliance.org

Thomas King, Executive Director

tking@machildrensalliance.org

The Cape and the Islands (Barnstable, Nantucket & Dukes Counties)

Children's Cove: The Cape & Islands Child Advocacy Center

PO Box 427

Barnstable, MA 02630

Phone: 508-375-0410

Fax: 508-375-0409

www.childrencove.org

Stacy Gallagher, Director

sgallagher@childrencove.org

Berkshire County

Berkshire County Kids' Place and Violence Prevention Center

63 Wendell Avenue

Pittsfield, MA 01201

Phone: 413-499-2800

Fax: 413-496-9327

www.kidsplaceonline.org

Heather Williamson, Program Director

hwilliamson@kidsplaceonline.org

Bristol County

Children's Advocacy Center of Bristol County

58 Arch Street

Fall River, MA 02724

Phone: 508-674-6111

Fax: 508-674-6441

www.cacofbc.org

Michelle Loranger, Executive Director

mlc@cacofbc.org

Essex County

Essex Children's Advocacy Center

Eastern District Attorney's Office

10 Federal Street, 5th Floor

Salem, MA 01970

Phone: 978-745-6610 Ext. 5096

Fax: 978-744-2161

www.mass.gov/essexda/EssexCAC

Pat Snyder-Mathews, Program Manager
Pat.Snyder-Mathews@state.ma.us

Franklin County

Children's Advocacy Center of Franklin and North Quabbin Area
PO Box 1099
Greenfield 01302
Phone: 508-843-7306
www.cacfranklinNQ.org
Irene Woods, Executive Director
Info@cacfranklinnq.org

Hampden County

Baystate Family Advocacy Center
50 Maple Street, 3rd Floor
Springfield, MA 01102
Phone: 413-794-9816
Fax: 413-794-4945
www.baystatehealth.org/fac
Rebekah Paredes, Practice Administrator
Rebekah.Paredes@baystatehealth.org

Middlesex County

Middlesex District Attorney's Office
15 Commonwealth Avenue
Woburn, MA 01801
Phone: 781-897-8400
Fax: 781-897-8401
www.middlesexcac.org
Katharine Folger, Chief, Child Protection Unit
katharine.folger@state.ma.us

Norfolk County

Norfolk Advocates for Children
12 Payson Road
Foxborough, MA 02035
Phone: 508-543-0500
Fax: 508-543-1728
www.norfolkadvocatesforchildren.com
Farah Hill, NAC Director
nacdirector@norfolkadvocatesforchildren.com

Hampshire County

Northwestern Children's Advocacy Center
Northwestern District Attorney's Office
PO Box 1247
Easthampton, MA 01027
Phone: 413-522-2946
Fax: 413-584-3635
www.northwesterncac.org/
Susan Loehn, Esq., Executive Director
nwcapinfo@gmail.com

Plymouth County
Plymouth County Children's Advocacy Center
309 Pleasant Street
Brockton, MA 02301
Phone: 508-580-3383
Fax: 508-580-0128
www.mass.gov/daplymouth/cac/cac.html
Nicole Richardi, Executive Director
Nicole.Richardi@state.ma.us

Suffolk County
Children's Advocacy Center of Suffolk County
989 Commonwealth Avenue
Boston, MA 02215
Phone: 617-779-2146
Fax: 617-779-2196
www.suffolkcac.org/
Susan Goldfarb, Executive Director
cac@suf.state.ma.us

Worcester County
Children's Advocacy Center of Worcester County
180 Main Street, 5th Floor
Worcester, MA 01608
Phone: 508-792-0214
Fax: 508-756-8675
www.worcesterda.com
Tracy DeFusco, Director
Tracy.Defusco@state.ma.us

Massachusetts Rape Crisis Programs

Funded in part by: Massachusetts Department of Public Health ~ Sexual Assault Prevention & Survivor Services
250 Washington Street, 4th floor; Boston, MA 02108-4619 ~ Phone: 617-624-5457 ~ TTY: 617-624-5992

All Rape Crisis Center Hotlines are available 24/7, every day of the year.

WESTERN MASSACHUSETTS

Elizabeth Freeman Center Hotline (866) 401-2425
Sexual Assault Prevention & Survivor Program TTY (413) 499-2425
43 Francis Avenue office (413) 499-2425
Pittsfield MA 01201-5063 fax (413) 443-3016
[additional sites in Adams, North Adams, & Great Barrington]

New England Learning Center for Women in Transition (NELCWIT) Hotline (413) 772-0806
479 Main Street TTY (413) 772-0815
Greenfield MA 01301 office (413) 772-0871
[additional site in Orange] fax (413) 772-2743

Center for Women and Community Hotline (413) 545-0800
University of Massachusetts – Amherst TTY (413) 577-0940
New Africa House, 180 Infirmary Way office (413) 545-0883
Amherst MA 01003 fax (413) 545-3649

YWCA of Western Massachusetts Hotline (800) 796-8711
Sexual Assault Prevention & Survivor Program TTY (413) 733-7100
1 Clough Street office (413) 732-3121
Springfield MA 01118-2213 fax (413) 747-0542
Statewide Spanish Rape Crisis Hotline (Llámamos) (800) 223-5001
[additional sites in Holyoke, Westfield & Huntington]

CENTRAL MASSACHUSETTS

Pathways for Change Hotline (800) 870-5905
588 Main Street TTY (888) 887-7130
Worcester MA 01608-2014 office (508) 852-7600
[additional site in Fitchburg] fax (508) 852-7870

Wayside Trauma Intervention Services Hotline (800) 511-5070
Valley Rape Crisis Program TTY (508) 478-4205
10 Asylum Street office (508) 478-6888
Milford MA 01757 fax (508) 478-9042

Voices Against Violence Hotline/TTY (800) 593-1125
South Middlesex Opportunity Council Hotline/TTY (508) 626-8686
7 Bishop Street office (508) 620-0834
Frammingham MA 01702-8313 fax (508) 872-4264

NORTHEAST MASSACHUSETTS

The Center for Hope and Healing Hotline (800) 542-5212
TTY (978) 452-8723
144 Merrimack Street, Suite 304 office (978) 452-7721
Lowell MA 01852-1710 fax (978) 458-2822

YWCA of Greater Lawrence Hotline (877) 509-9922
Sexual Assault Prevention & Survivor Program TTY (978) 686-8840
38 Lawrence Street office (978) 682-3039 x 2123
Lawrence MA 01840-1409 fax (978) 691-5286

*[additional site in Lynn – YWCA North Shore Rape Crisis Center
Hotline: 800-922-8772
office: 781-477-2313
20 Central Avenue, Suite 510, Lynn, MA 01901]*

SOUTHEAST MASSACHUSETTS

A Safe Place Hotline (508) 228-2111
Sexual Assault Prevention & Survivor Program TTY (508) 228-7095
5B Windy Way office (508) 228-0561
Nantucket MA 02554 fax (508) 228-8825

The Women's Center Hotline (888) 839-6636
New Bedford Women's Center TTY (508) 996-1177
405 County Street office (508) 996-3343
New Bedford MA 02740 fax (508) 999-7139
[additional site in Fall River]

A New Day Hotline (508) 588-8255
Health Imperatives TTY (508) 894-2869
960 West Chestnut Street office (508) 580-3964
Brockton MA 02301-5567 fax (508) 588-0034
[additional sites in Quincy & Plymouth]

Independence House Hotline (800) 439-6507
Cape Cod Rape Crisis Center TTY (508) 771-6782
160 Basset Lane office (508) 771-6507
Hyannis MA 02601 fax (508) 778-0143
[additional sites in Falmouth, Orleans & Provincetown]

CONNECT to end violence Hotline (508) 696-7233
Martha's Vineyard Community Services TTY (508) 684-8176
111 Edgartown Road office (508) 684-8074 x 103
Vineyard Haven MA 02568 fax (508) 684-8178
[additional site in Oak Bluffs is not wheelchair-accessible]

New Hope Hotline (800) 323-4673
Sexual Assault Prevention & Survivor Program TTY (800) 323-4673
140 Park Street office (508) 226-4015
Attleboro MA 02703 fax (508) 226-6917
[additional sites in Taunton & Webster]

BOSTON & 128 AREA

Boston Area Rape Crisis Center (BARCC) Hotline (800) 841-8371
99 Bishop Allen Drive TTY (617) 492-6434
Cambridge* MA 02139-3425 office (617) 492-8306
*[*additional site in Boston has full wheelchair access]* fax (617) 492-3291

The Rape Crisis Centers listed above offer **free**, confidential services for adolescent and adult survivors - and for people who care about survivors of all ages. Trained rape crisis counselors at local programs:

- Answer 24/7 hotlines for phone counseling, questions, and referrals
- Will meet a sexual assault survivor 24/7 at a hospital or a police station
- Will go with a sexual assault survivor to court
- Offer in-person counseling sessions at no cost (some rape crisis centers also offer support groups)
- Provide prevention education, professional training, outreach

Statewide Spanish Hotline

Llámamos: Statewide Spanish Rape Crisis Hotline (800) 223-5001
Operated by the YWCA of Western Massachusetts

Coalition (Note: not a service provider*)

Jane Doe Inc.: Massachusetts Coalition Against Sexual Assault and Domestic Violence *no hotline services
Jane Doe Inc. office (617) 248-0922
14 Beacon Street, Suite 507 TTY (617) 263-2200
Boston MA 02108 fax (617) 248-0902

For more information see: <http://www.mass.gov/dph/sexualassaultservices>



updated 1/29/15

SECTION SPECIFIC APPENDICES

APPENDIX 7: Policies and Procedures

The Centers for Disease Control (CDC)⁷⁶ suggests that implementing a child sexual abuse prevention policy and making the changes necessary to protect youth from child sexual abuse in organizations are not easy tasks, but that organizations should take on as many individual strategies to prevent child sexual abuse as they are able. They also offer several steps (paraphrased below) for organizations to take to effectively create, implement and measure child sexual abuse prevention strategies.

- Create a safe space
 - Create an open environment in which employees/volunteers feel comfortable discussing child sexual abuse.
- Have clear goals
 - Know why a certain strategy, policy, or practice is being considered and/or adopted to ensure that the most effective means are used to obtain goals.
- Create a process for developing child sexual abuse prevention policies and practices
 - Obtain buy-in from all levels of the organization so that policies and practices are accepted and owned by everyone.
 - Develop the policy. For example, gather a group of stakeholders, such as caregivers, employees/volunteers, and attorneys, to do the work.
 - Approve the policy, which includes making sure it complies with organizational policies, state and national laws, and child protective services and law enforcement.
 - Adopt the policy.
 - Develop a system to track allegations of child sexual abuse and outcomes of cases.
 - Inform your organization about the policy.
 - Implement the policy.
 - Evaluate the policy to continuously measure whether goals are being met. For example, the goal of setting criteria for screening and selection of employees/volunteers may be to make sure that employees/volunteers are appropriate for working with the youth within an organization. Once that goal is agreed upon and the screening and selection policies are adopted, the organization

⁷⁶ Saul J, Audage NC. *Preventing Child Sexual Abuse Within Youth-serving Organizations: Getting Started on Policies and Procedures*. Atlanta (GA): Centers for Disease Control and Prevention, National Center for Injury Prevention and Control; 2007.

needs to reassess on a regular basis if that goal is being met. If it is not, what needs to be changed to meet the goal? If it is, consider more efficient ways to meet the goal.

- Include appropriate child sexual abuse policies and practices in the prevention plan
 - In choosing child sexual abuse prevention policies and practices to adopt, your organization should gather information from several sources.
 - Consider the strategies raised in this document.
 - Use other organizations' experiences in this area. For example, look at the resources (Appendix 6) and sample policies (Below). YSOs may also consider discussing prevention policies with other organizations.

SAMPLE POLICIES AND PROCEDURES

National Policy Statements. American Youth Soccer Organization.
(<http://www.ayso.org/AssetFactory.aspx?did=7309>)

Model Policies and Procedures for Response to Allegations of Sexual Abuse. National Catholic Services, LLC
(<https://www.virtus.org/virtus/AllegationResponse.pdf>)

Model Policies for the Protection of Children and Youth from Abuse. The Church Pension Group, in partnership with The Nathan Network.
(<https://www.cpg.org/linkservid/3F743B4C-06F1-5DFF-86FFB64C8B79DE07/showMeta/0/>)

Sample Sexual Abuse and Misconduct Prevention Policy. The Glatfelter Healthcare Practice.
(<http://www.vfis.com/Portals/1/repository/sexual-abuse-sample-policy-ghp.b2c12ef6-dfef-4f3d-b467-b3ba7327e3e6.pdf>)

Sample Child Protection Policy for an Organization. Cal Ripken, Sr. Foundation.
(http://www.acacamps.org/sites/default/files/resource_library/CRSF-Template-National-Child-Protection-Policy.pdf)

Sample Child Abuse Awareness/Prevention Policy. Clemson University.
(<https://www.clemson.edu/extension/newberry/4h/files/volunteer-files/childabuseprevention.pdf>)

Child Abuse Prevention Policy and Procedures. YMCA of the Oranges.
(https://secure.ethicspoint.com/domain/media/en/gui/19089/Child_Abuse_Prevention_Policy.pdf)

Child Abuse & Maltreatment Prevention Policy. The Juilliard School, NY.
(<https://www.juilliard.edu/campus-life/institutional-policies-procedures/child-abuse-maltreatment-prevention-policy>)

2015 Staff Child Abuse Policies. Camp Ozark, AZ.
(<http://campozark.com/camp-ozark/summer-camp/2015-staff-child-abuse-policies>)

Rotary Youth Protection Guide: Sample District Youth Protection Policy (Page 17). Rotary International, IL.
(<https://my.rotary.org/en/document/rotary-youth-protection-guide>)

APPENDIX 8: - Screening Hiring and Licensing

SIDEBAR⁷⁷

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 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 below and Appendices 6 and 7.)

- ***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. Ask how they see the organization providing feedback for their work. If there is no healthy response, this could be problematic.
- ***What age/gender of youth do you want to work with? How would you feel about working with a different age/gender?***
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 determine if there is cause for concern.
- ***Is there anyone who might suggest, or has there ever been a situation in the past, where there was concern expressed that you should not work with children or youth? Why or why not? If yes, please explain the circumstances and how it was handled.***
- ***Why do you want the job?***
- ***What would you do in the following 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 or disagree with the organization’s policies and procedures or handle a situation poorly. In these cases, delve deeper into the situation to gauge whether or not they understand the organization’s culture, and/or if they exhibit difficulty in understanding the importance of establishing good boundaries with those in their care.

⁷⁷ Adapted from Saul J, Audage NC. Preventing Child Sexual Abuse Within Youth-serving Organizations: Getting Started on Policies and Procedures. Atlanta (GA): Centers for Disease Control and Prevention, National Center for Injury Prevention and Control

- ***Tell us about a time you disagreed with the rules at work. What did you do? What was the outcome?***
 - ***What makes you a good candidate for working with youth? What would your friends or colleagues say about how you interact with youth?***

Be concerned about responses describing the importance of developing strong, personal, exclusive connections with youth, or about relationships with youth (rather than with adults) being the most important in their lives.
 - ***What other hobbies or activities do you enjoy? How much time do you spend with children vs. adults outside of work?***

Determine if applicants have mature, adult relationships—not just relationships with children and youth.
-

Sample Questions and Statement of Suitability for Employment/Volunteer Applications

The application form may also include the following:

- Full name and any prior names used by the applicant, including any legal name changes;
- Current and previous address;
- All previous work and volunteer experiences;
- Professional credentials or licenses held (relevant to the position being sought);
- A request for disclosure of criminal history, reported and supported allegations of child abuse and/or disciplinary actions taken by a licensing or certifying authority including:
 - Disclosure of prior job loss due to inappropriate contact or conduct with children or youth
 - Disclosure of prior school suspension or expulsion (as a student) due to inappropriate contact or conduct with children or youth
 - NOTE: Many organizations also make it clear that after an applicant is hired, it is expected that subsequent arrests or criminal convictions while a member of the organization will be immediately disclosed
- If no criminal history is disclosed, applicant signature on a statement (referred to as a Statement of Suitability) that certifies the applicant knows of no reason that would prevent them from working safely with children and youth;
 - *SAMPLE: I hereby affirm that my answers to questions on this application are true and correct, and that I have not knowingly withheld any fact or circumstances that would, if disclosed, affect my application unfavorably, or prevent me from working safely with children and youth.*
- List of personal and professional references (see the section on reference checks for more information)
- Consent for contacting references and a signed Authorization Form allowing the organization to perform a criminal background check (See MA CORI and SORI Authorization Forms below) and;
- A clear statement that any information provided by the applicant that is later determined to be misleading or false may preclude the applicant from further consideration (or subject them to termination if the information is discovered after hire).
 - *SAMPLE: I understand that any false or misleading information submitted in this application is cause for denial of this application or termination of my employment or volunteer services regardless of when or how discovered and that my services are subject of (the organization's) review and the completion of a criminal history check.*

Sample Questions for Previous Employers

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 children and youth?
- Why would this person be a good candidate for working with children and youth? Is there any reason this person should not work with children and youth?
- Have you seen the applicant discipline youth (other than his or her own children)?
- Is the applicant able to receive constructive feedback, particularly relevant to safety issues when working with children or youth?
- Did the applicant demonstrate appropriate boundaries with children and youth? If not, please explain.
- Would you hire this person again? Would you want him or her in your organization in the future?
- Is there anything you would want to say about the applicant that I have not asked?

CORI Request Form



**THE COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF PUBLIC SAFETY AND SECURITY
Department of Criminal Justice Information Services**
200 Arlington Street, Suite 2200, Chelsea, MA 02150
TEL: 617-660-4640 | TTY: 617-660-4606 | FAX: 617-660-5973
MASS.GOV/CJIS



SUBJECT INFORMATION

Please complete this section using the information of the person whose CORI you are requesting.
The fields marked with an asterisk (*) are required fields.

* First Name: _____ Middle Initial: _____

* Last Name: _____ Suffix (Jr., Sr., etc.): _____

Former Last Name 1: _____

Former Last Name 2: _____

Former Last Name 3: _____

Former Last Name 4: _____

* Date of Birth (MM/DD/YYYY): _____ Place of Birth: _____

* Last **SIX** digits of Social Security Number: _____ -- _____ No Social Security Number

Sex: _____ Height: _____ ft. _____ in. Eye Color: _____ Race: _____

Driver's License or ID Number: _____ State of Issue: _____

Father's Full Name: _____

Mother's Full Name: _____

Current Address

* Street Address: _____

Apt. # or Suite: _____ *City: _____ *State: _____ *Zip: _____

SUBJECT VERIFICATION

The above information was verified by reviewing the following form(s) of government-issued identification:

Verified by:

Print Name of Verifying Employee

Signature of Verifying Employee

Date

Nationwide and State Criminal-History Checks

One of the most vital layers of a comprehensive screening program is a nationwide criminal-history check. There are essentially two types of criminal-history checks: fingerprint-based and name-based. Fingerprint-based checks offer one advantage as they can help properly identify someone who is using an alias and attempting to avoid detection. Name-based checks offer their own advantages; most notably—greater accessibility and timeliness of results.

The nationwide fingerprint check is a search of the FBI's master fingerprint file, which can be accessed through state law enforcement agencies. The check involves searching the official state repositories of criminal-history information. These state repositories are maintained in a database called the Integrated Automated Fingerprint Identification System (IAFIS). IAFIS is a national fingerprint and criminal-history system that responds to requests 24 hours a day, 365 days a year. IAFIS searches include arrest records, convictions, juvenile records (if provided by the state), dismissed charges or not-guilty verdicts, warrants, Sex Offender Registry information, physical characteristics (i.e., height, weight, hair, tattoos, and eye color), and aliases. All arrest data included in an Identification Record is obtained from fingerprint submissions, disposition reports, and other information submitted by agencies with criminal justice responsibilities.

Some state search checks allow you to access these records through either a fingerprint or name-based check by submitting the applicant's name, sex, and date of birth; however, the check may only include a search of the state where the information was submitted. State laws and regulations govern access to these records, and they vary significantly. Therefore, it is important to contact your state repository to determine if these records are accessible when creating background-screening policies. If a nationwide search is not an option, then it is important to check every state in which the applicant has resided. A list of the State Identification Bureaus is available on the FBI Criminal Justice Information Service's website at: <https://www.fbi.gov/services/cjis/identity-history-summary-checks/state-identification-bureau-listing>. The State Identification Bureau for Massachusetts is: Massachusetts State Police State Identification Section, 59 Horse Pond Rd., Sudbury, MA 01776 (508-358-3170).

Private Companies: Another way to obtain a criminal-history check is through a private company. These are name- or social security number- based searches of public court records, state correctional facilities, and state criminal history record repositories. These companies buy the information from the states and create their own proprietary databases. You supply the applicant's name, date of birth, and/or social security number, and they will provide your results in a report. It is important that the search includes a social security number, if possible, which will provide a history of past and present addresses and names associated with the individual's SSN, including aliases.

Private vendors return the results rather quickly; and can tailor the depth of a search (and, therefore, cost) based on the risk associated with a position. However, it is important to remember not all states sell their criminal-history information to commercial databases, even if the report says it is a nationwide check. When choosing a private company, it is recommended to inquire about the sources of their information and how often the data is updated. The commercial databases may also be missing important disposition information that is relevant to determine whether an individual was only *arrested for* versus *convicted of* a particular offense. It is also important to speak to legal counsel as there are certain legal requirements that organizations must meet in order to protect an individual's privacy rights and ensure fair use of the information, including compliance with the Fair Credit Reporting Act and state consumer reporting laws. (For further information, visit the Federal Trade Commission, Bureau of Consumer Protection website at [www.business.ftc.gov/ documents/bus08-using-consumer-reports-what-employers-need-know](http://www.business.ftc.gov/documents/bus08-using-consumer-reports-what-employers-need-know).)

There are pros and cons to both fingerprint-based and name-based checks. It is therefore recommended that you use a combination of these resources (when available) to minimize the challenges inherent to both types of searches.

What if a Criminal Record is Discovered?

As mentioned above, unless provided otherwise by law, the existence of a criminal record does not necessarily automatically disqualify an applicant from employment or volunteer services with children and youth. In general, if a background check indicates that there is adverse or criminal activity in the applicant's background, the office (or person) responsible for screening must be able (and have the authority) to determine if the offense prevents or does not prevent the applicant from working safely with children and youth.

It is important to establish assessment criteria defining what will constitute automatic disqualifiers for anyone who works directly with children and youth, and make these criteria known to the applicant. Organizations may wish to consider including the criteria below in their screening policy as factors that may disqualify an applicant. (This list is not exhaustive; an organization may wish to consider additional factors in their screening policy.)

- Failure to complete the entire screening process (applicant voluntarily withdrew the application, refused to submit to a criminal history check, etc.)
- Past history of sexually abusive or violent behaviors toward children or adolescents (regardless of whether the individual completed therapy)
- Conviction for any crime in which children or adolescents were involved (regardless of successful completion of probation or incarceration)
- History of violence or any sexually exploitative behavior including acts against adults
- Termination from a paid or volunteer position for misconduct with a child
- Refusing to follow a clear Code of Conduct
- Lying about criminal history
- Suspension or expulsion from a school as a student

Assessment criteria should be relevant to the needs of the organization and type of work the applicant may be performing. All hiring decisions should be based upon a complete review of the candidate's qualifications and characteristics.

In Massachusetts, the DCJIS has published guidance on this process and provided the criteria by which to evaluate a criminal record. There are two basic types of disqualification - presumptive and discretionary – and three lists of criminal offenses separated into tables – A, B and C.⁷⁸

If a criminal offense on a CORI is listed on Table A, the most egregious and violent offenses, the applicant is *presumptively* disqualified from employment or service. The screening or hiring

⁷⁸ See: <http://www.mass.gov/eopss/docs/dps/inf/inf-amuse-cori-valuation-criteria-table-a-c.pdf>

authority should notify the applicant immediately and share the findings. The applicant then has the opportunity to rebut the presumption that they are ineligible to work in an environment with children or other vulnerable parties.

If the individual believes that their CORI Report is inaccurate, the office or individual conducting the screening must provide the individual with a copy of the DCJIS packet “Information Concerning the Process in Correcting a Criminal Record.” If the individual’s criminal record is thereafter corrected, the individual can be provided with an opportunity to undergo another CORI check.

If an applicant has a criminal offense that is listed on Table B, the individual is *discretionarily* disqualified from employment or service. This means that the screening or hiring authority can exercise a measure of discretion in deciding whether the individual is capable of working safely with children and youth. As with offenses listed on Table A, the applicant must be notified immediately and be given the opportunity to rebut the finding of ineligibility by providing additional information (i.e., a letter of reference from a probation officer, the prosecuting district attorney, judge, or a treating mental health professional stating that the individual is unlikely to pose harm to the young or vulnerable).

In these discretionary situations, the individual reviewing the CORI information can also consider and weigh several additional factors on a case-by-case basis. These factors include:

- a. The relevance of the criminal offense to the nature of the employment or volunteer service being sought;
- b. The nature of the work to be performed;
- c. The seriousness and specific circumstances of the offense;
- d. The age of the candidate at the time of the offense;
- e. The number of offenses;
- f. The length of time since the offense occurred;
- g. Whether the applicant has pending charges
- h. Any relevant evidence of rehabilitation or lack thereof

If, after this process, the individual is either hired or is allowed to serve as a volunteer, or is not, it would be important to identify and document the factors and rationale that went into that decision, and to keep them with the individual’s personnel record.

If an applicant has a criminal offense that is listed in Table C, the individual is also discretionarily disqualified from employment or service. As in both circumstances described

above, the applicant must be notified immediately and be given the opportunity to rebut the finding of ineligibility by providing additional information. The information the screener may consider for additional review is the same information contained above in items a – h above, with the addition of item “i”: “Any other relevant information, including information submitted by the candidate or requested by the hiring authority, such as letters of reference from the applicant’s probation officer or a treating mental health professional.”

The difference between the process in terms of the offenses listed in Tables B and C is that Table C offenses (although serious) are considered to be the least egregious category of offenses, and do not necessarily require letters of reference to overturn the initial finding as Table B offenses do. Again, the factors that go into the final decision should be documented and kept with the individual’s personnel records. More information on this process can be found on the website of the Department of Criminal Justice Information Services:

<http://www.mass.gov/eopss/agencies/dcjis/> and on the MA Public Safety website at:
<http://www.mass.gov/eopss/agencies/dps/cori-policy.html>

APPENDIX 9: Code of Conduct and Monitoring

Sample Code of Conduct

(Name of Organization) Code of Conduct Involving Interactions with Children and Youth

(Name of Organization) is committed to the safety and protection of children and youth. This Code of Conduct, along with the (Name of Organization) child safety policies and procedures applies to all staff, employees, and volunteers who represent the (Name of Organization) and who interact with children or youth in both a direct and/or unsupervised capacity.

The public and private conduct of staff, employees, and volunteers acting on behalf of (Name of Organization) can inspire and motivate those with whom they interact, or can cause great harm if inappropriate. We must, at all times, be aware of the responsibilities that accompany our work.

We should be aware of our own and other persons' vulnerability, especially when working alone with children and youth, and be particularly aware that we are responsible for maintaining physical, emotional, and sexual boundaries in such interactions. We must avoid any covert or overt sexual behaviors with those for whom we have responsibility. This includes seductive speech, jokes or gestures as well as physical contact that exploits, abuses, or harasses. We are to provide safe environments for children and youth at all times.

We must show prudent discretion before touching another person, especially children and youth, and be aware of how physical touch will be perceived or received, and whether it would be an appropriate expression of greeting, care, concern, or celebration. (Name of Organization) personnel and volunteers are prohibited at all times from physically disciplining a child.

Physical contact with children can be misconstrued both by the recipient and by those who observe it, and should occur only when completely nonsexual and otherwise appropriate, and never in private. One-on-one meetings with a child or young person are best held in a public area; in a room where the interaction can be (or is being) observed; or in a room with the door left open, and another staff member or supervisor is notified about the meeting.

We must intervene when there is evidence of, or there is reasonable cause to suspect, that children and youth are being maltreated in any way. Suspected abuse or neglect must be reported to the appropriate organizational and civil authorities as described in the (Name of Organization) child safety policies and procedures.

Staff and volunteers should refrain from the illegal possession and/or illegal use of drugs and/or alcohol at all times, and from the use of tobacco products, alcohol and/or drugs when working with children. Adults should never buy alcohol, drugs, cigarettes, videos, or reading material that

is inappropriate and give it to young people. Staff members and volunteers should not accept or give gifts to children without the knowledge of their parents or guardians.

Communication with children by staff and volunteers is only allowed for (Name of Organization) business. For the protection of all concerned, the key safety concept that will be applied to these interactions is *transparency*. The following steps will reduce the risk of private or otherwise inappropriate communication between staff, volunteers, and minors:

- Communication between (Name of Organization) personnel (including volunteers) and children/youth that is outside the role of the professional or volunteer relationship is prohibited.
- Where possible, email exchanges between a minor and a person acting on behalf of the organization are to be made using a (Name of Organization) email address.
- Electronic communication that takes place over a (Name of Organization) network or platform may be subject to periodic monitoring.
- Staff, and volunteers who use text messaging or any form of online communications including social media (Facebook, Twitter, etc.) to communicate with children/youth may only do so for activities involving (Name of Organization) business.

The organizational contact for questions about or reports of breaches of this Code of Conduct is (enter name of the staff member's/volunteer's immediate supervisor). If the supervisor is not available, or if the behavior involves a direct supervisor, (Name of designated alternate or Human Resources) should be contacted.

In the event that a child or youth is in immediate danger, and a supervisor (or designated alternate or human resources) is not available, call the Department of Children and Families (Day and evening/weekend phone numbers) or the local Police Department (number) and notify your supervisor as soon as possible.

The (Name of Organization) will not discharge or in any manner retaliate or discriminate against any person who, in good faith, submits a report to DCF, expresses a concern, or reports a breach of any of the behaviors contained in this Code.

All incidents will be investigated within (a stated timeframe) by (name of designated individual, supervisor or manager), and the employee/volunteer reporting the incident will be informed of the outcomes.

Sample (Code of Conduct) Statement of Receipt and Agreement

I promise to strictly follow the rules and guidelines in this Code of Conduct as a condition of my employment or volunteer service to the children and youth of (Name of YSO).

I will:

Treat everyone with respect, loyalty, patience, integrity, courtesy, dignity and consideration.

Never be alone with individual children and/or youth at organizational activities without another adult being notified.

Use positive reinforcement rather than criticism, competition or comparison when working with children and/or youth.

Maintain appropriate physical boundaries at all times, and touch children – when necessary – only in ways that are appropriate, public, and non-sexual.

Comply with the mandatory reporting laws of the Commonwealth of Massachusetts and with the (Name of Organization) Policies and Procedures to report suspected child abuse. I understand that failure to report suspected child maltreatment to civil authorities is against the law.

Cooperate fully in any investigation of abuse of children and/or youth.

I will not:

Touch or speak to a child and/or youth in a sexual or other inappropriate manner.

Inflict any physical or emotional abuse such as striking, spanking, shaking, slapping, humiliating, ridiculing, threatening, or degrading children and/or youth.

Smoke or use tobacco products, or possess, or be under the influence of alcohol or illegal drugs at any time while working with children and/or youth.

Give a child who is not my own a ride home alone.

Accept or give gifts to children or youth without the knowledge of their parents or guardians.

Engage in private communications with children or youth via text messaging, email, Facebook, Twitter or other similar forms of electronic or social media.

Use Profanity in the presence of children and/or youth at any time.

I understand that as a person working with and/or providing services to children and youth under the auspices of (Name of YSO) I am subject to a criminal history background check. My signature confirms that I have read this Code of Conduct and agree to follow the standards it contains. I understand that any action inconsistent with this Code of Conduct, or failure to act as mandated by this Code of Conduct may result in disciplinary action up to and including removal from my position.

Name (Print): _____ Signature/Date: _____

Dance Studio Policies and Student Handbook – A Guide to Writing and Revising the Necessary Operating Terms of Your Business⁷⁹

It is important to have a set of guidelines, rules, or code of ethics that your dancers can refer to as a way to hold them to a level of professionalism as young dancers representing your dance studio. There is no right way to do this - it's up to you as a studio owner and what you value. Here is one example that you could use or adapt for your students.

A handbook can help your students and parents better understand your policies while also orienting them to the studio. This is where you can write a welcome message; share your studio mission, vision, and your expectations around general conduct. If you do testing or evaluations make this known as well as your teaching philosophy, methodology and criteria for classroom etiquette.

Section outline on dress code, class attire, student/parent conduct, studio rules & regulations:

- Dress code and class attire expectations by class, genre, or level
- Where to purchase dancewear if applicable
- Class etiquette, performance etiquette (interpersonal behavior)
- Student Expectations (conduct)
- Parent Expectations (conduct)
- Lost and found
- Visitor Information
- Studio facility specific information:
 - Entering, exiting, parking, safety, no smoking, securing valuables, lockers, video surveillance, closed circuit monitoring, etc.

⁷⁹ Extracts of suggested elements from DanceStudioOwner.com - used with permission.

Examples⁸⁰ of Organizational Mission Statements and Ethics Statements

National Level:

- **Girl Scouts of America:** Girl Scouting builds girls of courage, confidence, and character, who make the world a better place.
- **Boys & Girls Clubs of America:** To enable all young people, especially those who need us most, to reach their full potential as productive, caring, responsible citizens.
- **Prevent Child Abuse America:** To prevent the abuse and neglect of our nation's children

Local Level

Smaller, more locally affiliated organizations can also develop mission statements. An example of the mission statement of a small, privately owned business (a dance studio) reads:

- **Academy DMT⁸¹:** At the Academy of Dance, Music & Theatre we are dedicated to providing the tools necessary for children to grow, learn, and succeed through a love of the arts.

Goals in Support of Mission Statements:

Immediately following its Mission Statement, the Boys and Girls Clubs of America (above) provides a set of statements about what it intends to provide to the children it serves in order to attain the goal its Mission Statement outlines:

- **A Boys & Girls Club Provides:**
 - A safe place to learn and grow;
 - Ongoing relationships with caring, adult professionals;
 - Life-enhancing programs and character development experiences;
 - Hope and opportunity

The dance academy also combines its Mission Statement with a set of similar goals:

⁸⁰ 50 example mission statements: <https://topnonprofits.com/examples/nonprofit-mission-statements/>

⁸¹ <http://www.academydmt.com/Pages/default.aspx>

- **We offer respect and a high-quality education for all of our students:**
 - Teachers work hard to challenge and support students to achieve their best.
 - Every staff member will demonstrate the highest standards of professionalism.
 - We communicate with parents about their child's progress
 - We are committed to offering diverse and inspiring programs

Ethical Principles that organizations may wish to reflect within a Code of Conduct:

- Respect
 - Dignity is the right of all those subject to the Code. Respect for one's colleagues and for the children served by the YSO supports that right.
- Equality
 - Equal treatment for all, including equal opportunity, and support for diversity.
- Integrity
 - Those subject to the Code must not allow themselves to be placed under any circumstance that would inappropriately influence the performance of their duties with respect to the safety of the children/youth under their care. The safety of the children/youth in our care is a primary responsibility.
- Recognition of Excellence
 - Encourages effort and innovation
- Accountability
 - All are accountable for their decisions and actions and must voluntarily submit to the scrutiny necessary to ensure this.
 - The organization is accountable to its staff and clients for the tools, training, and guidance needed to perform their duties.
- Openness
 - Decisions must be made in an open, transparent manner. Information about the safety of children/youth should never be withheld under any circumstances.
- Honesty
 - All who are subject to the Code must be truthful

Additional Guidance on Constructing Codes of Ethics and Conduct

Code of Ethics

Explanation and Background

A Code of Ethics provides general principles to guide the behavior and decision making of staff, volunteers, and participants. It represents the standards to which the organization and the individuals working within it pledge to hold themselves. It can be as simple or as complicated as an organization chooses to make it.

It does not provide specific dos and don'ts but rather a philosophy by which decisions can be made. So, if an organization is “committed to providing children and youth with a safe and welcoming opportunity to gain soccer skills, participate on a team, and experience healthy competition” then staff can use those guidelines to make decisions about things like entering a highly competitive tournament, playing in unsafe weather, or dealing with a bullying situation.

In writing a Code of Ethics:

- Involve a variety of stakeholders, including staff, clients, parents, and others if possible
- Although Codes from other organizations can and should be reviewed, an organization's Code of Ethics should be specific and tailored to that organization
- A Code of Ethics should clarify the following points:
 - The goals of the organization
 - How the organization works to attain them
 - The culture the organization seeks to maintain
 - Who the organization's clients are
 - The organizations values and principles
- The Code of Ethics should be shared widely, with staff, participants, parents, partners, community members.
 - Consider adding the Code to the organization's website, providing written materials to staff, and posting internally
 - Ensure that all staff are trained on the Code of Ethics and understand its value in guiding decision making
- A Code of Ethics does not contain practical information on the day-to-day operations of the organization, on dealing with issues or problems, or on mandating behavior

Vignette:

*Jorge was hired as a basketball coach in September. He was trained on both the Code of Ethics and the Code of Conduct for the organization. One month into the season, a parent approached him asking if her child could join the team. She told him that the child had autism and loved basketball. However, he was not good at following rules. Jorge did not know what the leagues policy was on inclusion. However, the Code of Ethics for the organization that he had laminated to the clipboard he used at each practice stated, “The goal of the **** Basketball League is to teach young people the value of teamwork, of supporting one another, and of hard work.” From this, Jorge construed that the League would support him in taking this youth onto his team.*

For example, sports leagues can have the statement, “We seek above all else to produce teams that win championships at every level” or one that says, “We seek to provide a fun, low-stress, and inclusive environment”. Coaches would get a great deal of guidance on their decision making about team formation, practice scheduling, etc., from either one of those statements. However, neither of these includes a commitment to keeping participants safe from sexual abuse.

The statement “We seek to produce teams that win championships at every level while ensuring that participants are safe from abuse, bullying, and other harm” provides coaches, parents, and youth with a standard far more important than winning games.

Consider what your organization stands for, what it values, and how the organization supports its values through its staff, volunteers, and participants.

- A Code of Conduct provides staff, volunteers and others responsible for children and youth with very specific guidelines that will govern behavior including:
 - Adult interactions with youth/children
 - Interactions between youth/children
 - Interactions between staff/volunteers
 - Interactions with family
 - Approval, requirements, and monitoring of partners/volunteers/providers
 - Safety and security
 - Required responses to witnessing breaches to code
- A Code of Conduct must be specific to each organization and take into account the ways in which it operates that present risk or protective factors. Different types of organizations will have different risks.
 - Organizations should also consider the specifics of culture, experience, vulnerabilities, and other characteristics that may be unique to the population they serve.

- Creating a Code of Conduct
 - Completing a Strengths and Risk Assessment is a great way to begin creating a Code of Conduct specific to an organization. An assessment should consider the following questions:
 - i. What is the purpose of the organization?
 - ii. How should the purpose be carried out?
 - iii. Who does the organization interact with?
 - iv. Who does the work?
 - v. Who interacts with youth/children?
 - vi. How do youth interact with one another?
 - vii. What are the risks for this organization?
 - viii. What are the best practices for similar organizations?
 - The risk assessment will help an organization identify some of the main elements its Code of Conduct needs to cover including:
 - i. Personnel (staff, volunteers, mentors, and anyone else who may interact with and be responsible for young people)
 - 1. Appropriate/Inappropriate/Harmful conduct
 - 2. Ratios of personnel to participants
 - 3. Intimacy/familiarity
 - 4. Touch
 - 5. Information sharing
 - ii. Premises & Technology
 - 1. Areas where a child could be isolated
 - 2. Clear view at all times
 - 3. Appropriate social media policy
 - 4. Texting/outside interactions
 - iii. Participants
 - 1. Vulnerabilities, both overall and particular to the population served
 - 2. Culture, including cultural norms that may impact vulnerability to abuse
 - 3. Supports
 - 4. Potential for harmful interactions between participants
 - iv. Parents and Visitors
 - v. Partners, Supporting agencies, vendors, etc.
 - vi. Reporting Procedures
 - Institutionalizing Your Organization's Code of Conduct

- Gaining buy-in from leadership and staff
- Training all staff, leadership, volunteers etc.
 - i. Training should be in person (ideal), interactive, and annual
 - ii. Webinar or online training is acceptable as long as there are opportunities for interaction/questions/follow-up
 - iii. Signatures on statements of receipt and agreement should be required for each staff/volunteer and kept in employee files
- Sharing your Code of Conduct with youth (in an age appropriate way) and with parents/caregivers to increase bystander/participant support
- Posting major points in clear view, in all relevant languages
- Enforcing/Implementation
 - Setting clear protocols for responding to and investigating allegations
 - Ensuring that the protocol is followed in every instance, by every staff member, and by every young person. “Exceptions require authorization”
 - Providing transparency in the process of supporting/investigating involved parties
 - Using observed or reported issues not covered in code to improve, “Living Document”
- Monitoring, and Organizational Practice
 - Staff are regularly reminded of Code of Conduct policies relevant to their roles or as programming changes by season/focus
 - Staff are regularly reminded of their obligation to report breaches in code
 - Supervisors will support staff and volunteer understanding of monitoring, improving, and disciplining staff around boundary issues.

“Vignette”- When Joe arrived at BGCB, he was trained on the organization’s Code of Conduct. It led him through situations he may encounter and provided appropriate actions he could take. On his first day on the job, one of the girls asked if she could “friend” him on Facebook. The Code of Conduct he signed gave him specific language to use when refusing to interact with a youth on social media. “If I had not been trained, I might have said no anyway because it felt wrong, but I also would have wondered if I was wrong to hurt her feelings.”

Organizations will have Codes of Conduct that differ significantly based on size, purpose, location, staffing, age served, additional vulnerabilities of youth served, and many other

variables. All organizations should consider all of these variables in creating or adapting a Code of Conduct for their organization.

What are the activities the organization engages in that provide opportunities for inappropriate interactions and sexual abuse?

These might include:

- One-on-one interactions, use of social media, few staff members, use of volunteers, activities that require clothing changes
- Serving vulnerable populations including non-verbal/limited communication skills, very young children, GLBTQ youth, and others

What are the boundaries that we can set that will provide staff with clear guidelines for interactions and provide others with ways to evaluate their actions? These may include:

- No (or limited and monitored) social media contact
- Never being alone with youth or, if the staff function requires it (e.g., counseling, tutoring, etc.), with appropriate training and precautions
- Keeping a regular schedule of interactions with youth and families
- Not allowing youth of significantly different ages to be alone together or, if required (e.g., tutoring, mentoring, etc.) with appropriate recruitment screening, training, supervision, ongoing support and safe program practices)

Again, each organization must evaluate its own operations and goals and decide what to include based upon the risks and benefits of each interaction. Organizations will also benefit from reviewing the documents created by other organizations.

A large youth serving organization in which all activities take place on site may have as a part of their Code of Conduct:

Personal contact information

(Organization) does not expect that staff will share their personal contact information with members. In the event that cell phone numbers need to be shared to ensure communication during a field trip or other event, cell phones are available from the Executive Director. Note that all communication should be program related. On the rare occasions staff members share personal contact information with a member or parent, a supervisor must be notified. *Please see “Cell Phone Policy” in Employee Handbook “*

However, a mentoring organization in which frequent personal communication between mentor and mentee is expected would have a different guideline on sharing personal information. In both cases, the expectation is set that there are appropriate and inappropriate ways to communicate with youth, they are clearly spelled out, and are shared widely.

Some additional circumstances to be aware of include, but are not limited to:

- Risk of inappropriate youth-on-youth interactions.
 - Organizations need to monitor 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 are interacting with each other. Of course, be concerned with situations where youth may tease, bully, harass, or 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.
 - Encourage pro-social activities and integrate them into events and programs, etc., so that youth are aware of, and can help to ensure a safer environment for everyone.
- Prohibitions and restriction 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 the organization's building.

- The second type is contact between youth and people not affiliated with the organization that occurs while youth are under its care.
- Develop a system for monitoring the comings and goings of all youth and adults who enter and leave the facility. This system might include procedures for signing in and out. Be clear about when children or youth are no longer the responsibility of the organization and when they are clearly the responsibility of the parent or guardian (e.g., bus drop off for a summer camp).
- Develop specific policies about interactions between youth and people not affiliated with the organization – particularly if it is located in a building that houses more than one program, or if the organization’s activities take place in public areas (e.g., a sports field).

SAMPLE TRAINING SCENARIOS FOR CODE OF CONDUCT

Scenario 1

Mike is a second-year camp counselor at your camp. He is sensitive and connects easily with those campers who are unsure of themselves and hold back from the rest of the crowd. You are a first-year counselor, but are very sensitive to the code of conduct and the importance of maintaining appropriate boundaries between adults and children. Mike’s presence, personality and help with the marginal children help the camp to be a fun and formative time for all those who attend. You also learned that Mike has stayed in touch with one of the more troubled girls from last year’s camp. However, you have also observed that Mike seems to be unable to hear directions about proper boundaries between camp staff and campers. On two or three occasions Mike has been reminded by his supervisor that it is inappropriate for girls to sit on his lap. Yet Mike continues with these activities, saying to you and to his supervisor, “I just can’t say no to a kid who wants to play, besides, it’s just harmless fun anyway.” As a camp counselor, you should:

- a) Go to the camp director and demand that Mike should be immediately fired.
- b) Agree that you are probably overreacting since the children seem to enjoy Mike’s attention and continue to support him in his special relationships with children.
- c) Bring the situation to the attention of Mike’s supervisor who should then remind Mike that the camp’s efforts to protect children are taken very seriously, that he has repeatedly

ignored the Code of Conduct, that he is watching him, and that another violation will result in his dismissal.

- d) Keep a close eye on the children for any signs, symptoms, or behaviors that would indicate they are being sexually abused.

Feedback:

A is not the best answer. Although Mike has been exhibiting inappropriate behavior with the girls, and his supervisor has reminded him that it is inappropriate, he has not yet told him to stop, or discussed any clear, specific consequences that will result if his behavior continues.

B is not the best answer. No one wants to believe the worst about anybody, but a healthy suspicion is warranted when the safety of children is at risk. Ignoring your initial “gut” instincts and rationalizing Mike’s behavior is dangerous. Mike may also be grooming you.

C is the correct answer. Mike has already exhibited some of the warning signs of an offender who is grooming children. He has repeatedly ignored his supervisor’s directions about appropriate behavior and the Code of Conduct. It’s obvious that he sees himself as “above the rules”. He blames the girls who “want to play” and minimizes his own role by saying that it’s just “harmless fun.” His supervisor’s ultimatum and follow-through are appropriate. Mike’s outside relationship with the troubled girl from last year should also be explored.

D is not the best answer by itself since, if Mike is actively grooming the children, they may not exhibit those behaviors until they are actually abused. You are trying to *prevent* sexual abuse, not wait until it happens. Certainly, being aware of the children’s behavior is important, but it is Mike’s behavior, not the children’s, that should be your main concern.

Scenario 2

Mr. Roberts is very popular with the students. He is sensitive and connects easily with students who are unsure of themselves, hold back from the rest of the crowd, or are marginalized. He often converses and jokes with the students in the halls between classes, and they respond in kind. It is common for him to greet students and staff with a hug and sometimes with a pat on the back. A male student has recently complained to the administration that Mr. Roberts’ hugs and physical contact make him uncomfortable. Mr. Roberts seems to be unable to hear directions about proper boundaries between faculty and students. He has been told by the principal to stop all physical contact with students and staff. He agrees to try, but says he can’t promise anything because that’s just the way he is and he isn’t doing anything wrong.

This scenario raises some interesting questions, red flags, and possible concerns. Is Mr. Roberts a gregarious and enthusiastic teacher who uses his “big” personality to form relationships with students, gain their trust and then try to help them “come out of their shell” or is there something more sinister going on that may warrant a call to the Department of Children and Families? Is this situation (or could this situation become) a violation of the law, the school’s “code of conduct” or other district policies? Is the principal overreacting or might the situation contain potential negative consequences for the teacher, the student who complained, and for the school community? What responses and actions might result in a more positive outcome and/or what proactive measures might be considered?

Most schools and youth-serving organizations have created codes of conduct that provide written guidance to employees and volunteers about maintaining appropriate, respectful and professional physical, emotional, and sexual boundaries with minors in their care. In doing so, adults are reminded of their own vulnerability as well as the vulnerability of children to harm by means of an adult’s inappropriate speech, gestures, attitudes and – in particular – physical contact that exploits, abuses or harasses. Clearly, their intent is not to prohibit all forms of appropriate physical contact with children – and appropriateness can look different in pre-school contexts as opposed to middle and high school contexts – but to enjoin teachers and others to use “common sense” with any physical contact or touching to eliminate possible misunderstandings.

Before touching another person, especially a minor, we must be aware of how the physical touch will be perceived or received, and whether it would be an appropriate expression of greeting, care, concern or celebration. Codes of conduct should also identify acceptable forms of touching a child (high fives, handshakes, fist bumps, pats on the back or shoulder, or side hugs) and the types of physical contact to be avoided (tickling, rough-housing, wrestling, piggyback rides, any type of massage, and any form of unwanted affection). If observed or reported, these types of behaviors raise the proverbial “red flags” and need to be investigated.

Getting back to Mr. Roberts, as an extension of his popularity and ease of conversation with students, he has used physical touch to convey his friendship towards them and to make them feel at ease with him. However, this kind of touching can be (and has been) construed as inappropriate by some students who may feel that their personal space has been invaded or even worse, that the touching is sexual in nature. If students are uncomfortable with being touched, they do not feel safe and this will impact their learning environment.

Mr. Roberts does not seem to be able to interpret the “signals” given off by students who are (and others who may be) uncomfortable with his physical means of expression. Although all teachers want to maintain positive rapport with students, teachers are not friends; they are professionals and should maintain professional interactions. The student’s complaint was not

about an incident of sexual abuse – but misinterpretations of intent by even a single student can lead to a teacher having to defend his or her actions, vulnerability to claims of misconduct, and to serious consequences for both the educator and for the school.

The principal acted appropriately in handling the situation internally, bringing the student's concerns to Mr. Roberts, and prohibiting similar behavior in the future with both students and staff. The conversation and direction should be documented in writing, with consequences clearly outlined – up to and including dismissal. At this point, there is no need to involve children's protective services, but the principal needs to be vigilant and continue monitoring Mr. Roberts' interactions – particularly in light of the fact that Mr. Roberts himself cannot commit to compliance with the direction. In this kind of case, the students' perception of the nature of the touching must be taken seriously. However, it must also be balanced by the observations of others and the response of the teacher in question. Students must feel that they have been listened to and that efforts will be made to secure their environment. The principal should also talk with Mr. Roberts about alternative ways for him to demonstrate support and acceptance toward his students while respecting their personal space and avoiding physical contact. If the behavior is repeated, and/or if additional complaints are received, it would be a stronger indication that something more serious is going on, and that the authorities may need to be involved.

Positive Youth Development

What is the Positive Youth Development Approach and Why Does it Matter?

When we approach youth work from the perspective that youth are assets to be developed rather than vessels to fill or problems to be managed, youth develop the necessary skills and tools needed to become high functioning adults. In this module, learn more about the positive youth development approach, including supporting research, and the outcomes that can be achieved by integrating a positive youth development approach into youth programming.

Ensure Physical and Psychological Safety

Children and youth often make a decision to participate in a program based upon their sense of physical and psychological safety. Young people who do not feel safe are less likely to engage and learn from their participation. Learn more about fostering safety in your organization.

Build Supportive Relationships

Afterschool and youth development programs offer unique opportunities for youth to develop consistent, committed relationships with caring adults. Frequently, the quality of relationships with the staff are a significant predictor of youths' participation in the program. Learn how to develop supportive relationships in your program for maximum impact.

Create Opportunities to Belong

Provides an overview of both the processes and factors that support the engagement of youth in programs. Emphasis is placed on the development of identity in adolescents and the role of youth workers in supporting the development of positive identity.

Foster Positive Social Norms

The influence of norms is often more powerful than peer pressure during adolescence. Youth programs have an important role in fostering positive social norms among youth. Learn more about the broad influences of family, institutions, peers and others and how your program can help shape the development and adoption of positive social norms among youth.

Provide Appropriate Structure

Maintaining a healthy balance of structure and autonomy is important in youth development programs. Learn more about how setting and maintaining expectations, offering developmentally appropriate activities and your role as a youth development professional all work to influence the right balance.

Promote Support for Efficacy and Mattering

Youth are the agents of their own development, with support from a myriad of adults. Learn more about what empowering youth means, why it matters, and how to promote youth empowerment to benefit both youth and the communities where they live.

Opportunities for Skill Building

Youth programs may provide an alternative venue, compared to traditional settings, in which youth may learn more effectively. Learn more about how your program can support youth by using a variety of teaching methods and learning styles to develop key skills.

Integration of Family, School and Community Efforts

Youth programs can act as a catalyst for bringing parents, teachers, community members and young people together to address issues relevant to the community as a whole. Learn more about how to integrate all of the positive youth development principles to “create a village”.

Source: Foundations for Youth Development

APPENDIX 10: Ensuring Safe Physical Environments and Safe Technology

Checklist for Safe Environment

Visibility

	In Place	In Process	Not Yet Started	Not Needed
Have you assessed your facility for visibility?				
Keeping in mind programming needs, do you have a written plan for changes that can be made to maximize visibility and plans to maintain that visibility?				
Do you have mirrors to improve visibility in areas that are out of the line of vision of staff as appropriate?				
Do you have windows, as appropriate, in doors that may be closed when the room is in use?				
Do you have a written policy in place for those rooms that cannot have a window installed that includes whether the door is to be left open and who is allowed to be in the room under what circumstances?				
For programming that cannot be observed, does your policy require that it be interruptible?				
Have you secured all unsafe, isolated, or concealed spaces?				
Do you have signs that clearly mark areas that are off limits?				
Does all space used by children/youth have adequate lighting?				
Have you checked for blind spots and eliminated them to the extent possible?				
Do you have written policies that address parental access?				
Do you have written policies that address staff/child ratios?				
Do you have written policies that address on-site toileting, showering, and personal grooming spaces including who can access them, when, and under what supervision?				
Do you have written procedures aimed at managing spaces such as bathrooms when they are used by more than one child at once, paying special attention to spaces that are used by youth of different ages and developmental capacities?				
Do you have a Safety Committee of staff and youth that periodically walk through facility and conduct safety surveys to note potential problem areas and needed maintenance?				
Do you have a written procedure for checking the visibility				

of spaces to be used for off-site activities?				
Do you inform everyone what spaces are off limits during off-site activities?				
Do you have a procedure for assuring that both youth and adult supervisors know who is responsible for supervising who for off-site activities?				
Are adult supervisors and participants readily identifiable during off-site activities through the use of tee shirts or caps etc.?				
Do you have a written policy for staff/youth ratios for off-site activities that is appropriate to the situation?				
Do you have written policies for off-site toileting, showering, and grooming activities if needed?				
Do you have a written procedure for when hands on help is required for toileting, grooming, or changing clothes?				
Overnight trips				
Do you have written policies for who is allowed to room with each other?				
Do you have written policies for who is allowed to access rooms occupied by youth and rooms occupied by adults?				
Do you have written procedures for who will check on youth in their rooms, under what circumstances, and how frequently?				
Are parents informed of sleeping arrangements before each trip?				
If sleeping in a common area such as a gym, do you have a procedure for separating adults and youth, separating genders when appropriate, separating older youth from younger youth when appropriate?				
If sleeping in a common area such as a gym, do you assigned adults in teams to watch over the youth?				

Access

	In Place	In Process	Not Yet Started	Not Needed
Are your program boundaries clearly defined and marked with signage?				
If possible, do you have a single point of entry?				
Do you have a written policy for monitoring the entry and exit points?				
Have you marked and locked areas that are off limits?				
Do you have written procedures for admitting and releasing				

youth?				
Do you have written policies and procedures that clearly define which people outside of your organization are allowed in and how to monitor that?				
Do you have a list of who is authorized to pick up a child from the program and a written procedure for how to manage release to someone other than an identified parent or guardian?				
Are all non-screened adults accompanied by a screened adult when on site? Do you have a written policy and procedure that defines these steps?				
Do you have a written policy and procedure for restricting vendors and other service or maintenance providers to the area in which their service is being provided and are children prohibited from those areas?				
Are adult supervisors easily identifiable?				
Do you have a written procedure on what to do if an unknown or unauthorized person gains entry to the site				
Do you have a written procedure for identifying when responsibility for a child changes between parents and program staff?				
Off-Site				
Do you have a procedure for assuring that each child is assigned to an adult supervisor and each child and supervisor knows who is assigned.				
Do you communicate the physical boundaries for activities?				
Do all youth know how to immediately access a supervising adult?				
Do adult supervisors carry cell phones or radios and can they easily communicate with each other?				
Do you have written procedures for what to do if an unknown or unscreened adult tries to interact with the youth?				

Supervision

	In Place	In Process	Not Yet Started	Not Needed
Do you have written policies and procedures for supervision of youth that are reviewed with all staff, volunteers, and youth when appropriate?				
Do you have written policies for supervising adult/youth ratios?				

Are adult supervisors easily identifiable?				
Are older youth who are given responsibility for supervision of a younger child working in tandem with a screened adult over the age of 18?				
Do you have written procedures to assure adult supervisors know where their assigned youth are at all times during off-site activities?				
Have you trained youth on what to do if people outside of the organization approach them during an off-site activity?				

Transportation

	In Place	In Process	Not Yet Started	Not Needed
Do you have written parental consent to transport youth?				
Do you have written policies and procedures that govern who can transport youth and under what circumstances?				
Do you have written policies that limits the potential for an adult to be alone with youth in a vehicle or separates the adult and the youth by having the youth sit in the back?				
Do you have a policy against transporting children in vehicles with tinted windows or panels that eliminate visibility?				
Do your policies and procedures for transporting youth comply with state and local regulations that apply?				
Do you have a procedure for check in and check out that provides information regarding where drivers are expected to be at any given time?				
Do you maintain a transportation log which notes all youth and adults present in a vehicle at any given time?				

Technology

	In Place	In Process	Not Yet Started	Not Needed
Do you have policies and procedures that clearly define allowable and prohibited means of electronic communication including phone calls, text messages, email, and use of social media?				
Does more than one adult have access to email, texting, and social media accounts that are used for communication between adults and youth?				

Do you have monitoring software that limits access to inappropriate websites for computers and tablets that are used by youth?				
Do you have written policies that prohibit adults from joining social media pages belonging to youth in the program and prohibits adults from inviting program youth to join their page?				
Do you obtain written permission from parents for any electronic communication with youth, specifying which accounts will be used?				
Do you have written policies governing the use of personal devices to communicate electronically with youth?				
Are technological devices prohibited from bathrooms and spaces used for personal grooming?				

Communication

	In Place	In Process	Not Yet Started	Not Needed
Do you send regular reminders of the responsibilities associated with maintaining safe physical and virtual environments (i.e. newsletters, posters, bulletins)?				
Does the organization's leadership send periodic statements concerning ongoing commitment to the safe environment policies?				
Are the safe environment policies and procedures widely distributed?				
Are there checklists or other tools about what is necessary to have in place or to have accomplished to be considered in compliance?				
Do you communicate your Safe Environment practices to parents?				
Do you communicate your Safe Environment practices to youth participants?				
Do you have ongoing training in safety policies and procedures?				
Are the results of "safety audits" widely distributed?				
Is there a mechanism in place for awards, certificates or recognition of efforts to ensure the safety of children/youth in the organization's care?				

Sample Electronic Communication Policy

A major component of the abuse prevention code of conduct used by many youth serving organizations is that no communication is allowed outside of program activities. Current technology has made monitoring and enforcement of that standard extremely challenging, yet it must be done to protect both staff and the children/youth in their programs. Well-defined screening and hiring protocols combined with detailed staff training and thorough parental education and feedback practices will work together to meet the goal of protecting children and youth.

Implementing an Electronic Communication Policy is an important means of keeping children safe. Designed to guide and protect both staff and the children and youth serve, it should be shared with parents and participants so that all expectations and controls are fully understood.

Your policy should include at least the following:

- **Phone Calls / Text Messages** – Staff members are prohibited from initiating or receiving personal phone calls or text messages with youth who are in or whom they have met through (Name of YSO) programming. A call or text is considered personal if it does not involve both a (Name of YSO) device and (Name of YSO)-specific subject matter. Staff members are required to report incoming calls or texts to their supervisor immediately.
- **Email / Instant Messaging** – Staff may not share any personal email address or instant message name or nickname with youth. Staff may neither initiate nor respond to email or instant message communication from youth while using any personal (i.e., non-(Name of YSO)) account or connection to the internet.
- **Social networking websites** – Any communication with youth using this medium (e.g., Facebook, Twitter, etc.) must use (Name of YSO) sponsored or approved sites – no personal blog or social networking website may be used. Also,
 - Any staff profile or blog must be private and inaccessible to youth; the site should not have pictures of, or make references to specific youth.
 - Staff with profiles on social networking sites may neither request to be friends with nor accept as a friend a youth as described in the policy.
- **Appropriate protocols** - All communication with youth must be from (Name of YSO) accounts and devices. Communication from youth must be forwarded to supervisory staff and the youth's parents or guardians must be notified. All other communication with youth must be documented immediately with the staff member's supervisor.

Programming with older youth who volunteer or are paid to assist adult staff in (Name of YSO) activities will often require communicating with them electronically. Youth staff are required to

use only (Name of YSO) devices and accounts for such communication and contact records will be regularly monitored to identify excessive communication with any particular participant. If this type of behavior is identified, (Name of YSO) staff will determine the appropriateness of the contact. Such communication may have been appropriate, but excessive contact with a particular child is a pattern common to abusers that must be investigated.

How is Your Facility Designed to Keep Children Safe?⁸²

Child development and school-age programs operate in many different types of facilities. Your program might operate within a dedicated Child Development Center (CDC), in a renovated elementary school, a community center, or a variety of other settings. Regardless of floor plan or design elements, all programs share several key characteristics that protect children from harm. These features promote visibility and enable active supervision of children at all times (depending on the age and design of your facility, it may not have all of these features):

In CDCs:

- There are windows in the doors to all rooms and areas used to care for children (except for adult and school-age toilet rooms), allowing activities in the room to be viewed from outside the room.
- There are vision panels between activity rooms and hallways to provide visual access.
- Doors on toilet stalls are removed, except for toilets used by children over age 5 and adults; or there are half walls that allow line of sight supervision for children under age 5.
- Walls around toilet stalls are reduced to half the normal height, if possible, to permit better viewing of toilet areas.
- Storage areas are designed so the hardware on the doors is operable from both sides. Doors on closets can be opened from the inside without a key. This prevents a child from being locked in a closet or storage area. In some Services, vision panels are required in the doors for all storage areas.
- There are no draperies or blinds that obstruct the view into areas in which children receive care or areas where someone might take a child. Art work is not hung on windows.
- There are sinks for handwashing in activity rooms rather than in toilet areas so children can be observed more easily.
- Diapering areas are separated from activity rooms by either half walls or walls with glass. Ideally, buildings are constructed with no walls between diapering areas and activity rooms to increase visibility of caregivers and children during diapering.
- Crib or sleeping areas are located in activity rooms. If the design of the building prevents this arrangement, crib or sleeping areas are separated from activity rooms by half walls or walls with glass.
- Concave mirrors are installed where needed to improve visibility.
- Rooms used for evening care are located near the front door so staff and parents have easy access.
- Outdoor play areas are constructed so all parts can be viewed from inside the center and from outside the playground fencing. There are windows in the walls between activity rooms and outdoor play areas to permit viewing of both areas.
- Doors to storage areas are visible from the main building so they can be visually monitored by adults other than those on the playground.

⁸² Virtual Lab School: <https://www.virtuallabschool.org/tcs/child-abuse-prevention/lesson-5>

- Play structures such as lofts and play houses are built so that children can be viewed while at play in the structure.
- Closed circuit television systems are installed and allow staff members, managers, T&Cs, and families to monitor program activities.

In School-Age programs:

- All program areas (rooms, hallways, parking lots, and outdoors spaces) are well-lit and visibility is good enough that staff members can supervise all spaces easily.
- Storage areas are designed so the hardware on the doors is operable from both sides. Doors on closets can be opened from the inside without a key. This prevents a child from being locked in a closet or storage area. In some Services, vision panels are required in the doors for all storage areas. This prevents children from entering unsafe spaces with each other or an adult who means harm.
- Closed circuit television systems are installed and allow staff members, managers, T&Cs, and families to monitor program activities.
- There are no draperies or blinds that obstruct the view into areas in which children receive care or areas where someone might take a child.
- Concave mirrors are installed where needed to improve visibility around corners or into difficult-to-see spaces.
- Doors to outdoor storage areas are visible from the main building so they can be visually monitored by adults other than those on the playground.

There are additional design elements that help ensure children are safe. According to Koralek's guide to preventing child abuse and neglect in center settings (1993), these include:

- The reception desk is located so that the entrance can be viewed by reception desk staff.
- Large centers have alarms on all exit doors that do not open onto a play area.
- Centers have alarms on all exit doors, other than the main entrance and the kitchen exterior entrance, that do not open to a fenced area.
- A system at the main entrance, such as a buzzer system, restricts entry to the building at night when only a few caregiving employees are on duty.

**APPENDIX 11: Recognizing, Responding to, and Reporting Allegations and Suspicions of
Child Sexual Abuse: DCF Brochure**

Child Protection Information

For more information about reporting child abuse and/or neglect:

- www.mass.gov/dcf
for general information or to find a DCF Area Office
- **Child-At-Risk-Hotline**
800-792-5200
- **DCF Ombudsman**
617-748-2444 (9am - 5pm, weekdays)
for inquiries about DCF programs, policies or service delivery.

Contact Us

Massachusetts Department of Children and Families
600 Washington Street, 6th Floor
Boston, MA 02111

Telephone: 617-748-2000
Fax: 617-261-7435

DCF Area Office Directory

WESTERN REGION

- Greenfield 413-775-5000
- Holyoke 413-493-2600
- Pittsfield 413-236-1800
- Robert Van Wart Center/
East Springfield 413-205-0500
- Springfield 413-452-3200

CENTRAL REGION

- Worcester East 508-793-8000
- Worcester West 508-929-2000
- Whitinsville 508-929-1000
- Leominster 978-353-3600

BOSTON REGION

- Dimock Street, Roxbury 617-989-2800
- Hyde Park 617-363-5000
- Harbor, Chelsea 617-660-3400
- Park Street, Dorchester 617-822-4700

NORTHERN REGION

- Cambridge/Somerville 617-520-8700
- Cape Ann, Salem 978-825-3800
- Framingham 508-424-0100
- Haverhill 978-469-8800
- Lawrence 978-557-2500
- Lowell 978-275-6800
- Lynn 781-477-1600
- Malden 781-388-7100

SOUTHERN REGION

- Arlington 781-641-8500
- Brockton 508-894-3700
- Cape Cod & Islands 508-760-0200
- Fall River 508-235-9800
- New Bedford 508-910-1000
- Plymouth 508-732-6200
- Braintree 781-794-4400
- Taunton/Attleboro 508-821-7000



dcf MASSACHUSETTS DEPARTMENT OF
Children & Families

Printed by
MassCor
800-222-2211

Child Abuse and Neglect Reporting
A Guide for Mandated Reporters

Child-At-Risk-Hotline
800-792-5200
www.mass.gov/dcf

dcf

REPORTING CHILD ABUSE AND NEGLECT (Sample 1)

Massachusetts law: A report must be filed when a mandated reporter has knowledge or reasonable cause to believe that a person under the age of 18 is suffering abuse or neglect.

(Name of YSO): Requires all staff, employees and volunteers to contact the designated authority when they have knowledge or reasonable cause to believe that a person under the age of 18 is being, or has been, abused or neglected.

Any person may contact or ask to meet with (Name of designee) concerning suspected child abuse by anyone - including managers, supervisors, staff, volunteers, or another child/youth.



Reports concerning suspected, observed, or disclosed child abuse must be made to (Name of designee).

Contact (Name of designee) by dialing xxxxx from any (Name of organization) Phone or dial direct:

Direct Number 1 – (xxx) xxx-xxxx

Direct Number 2 – (xxx) xxx-xxxx

After Hours Number – (xxx) xxx-xxxx

A person who was abused as a child but is now an adult also has the right to file a report with the local District Attorney (DA):

**Middlesex County DA
(781) 897-8300**

**Suffolk County DA
(617) 619-4000**



Persons making a report about child abuse to (Name of designee) should be prepared to provide the following information (if known):

- the name/address of the child, his parents, or other person responsible for his care;
- the child's age and sex;
- the nature and extent of the child's injuries, abuse, maltreatment, or neglect, including any evidence of prior injuries, abuse, maltreatment, or neglect;
- the circumstances under which the reporter first became aware of the above;
- whatever action, if any, was taken to treat, shelter, or otherwise assist the child; and
- the name of the person or persons making such report.

(Name or YSO) will cooperate with civil authorities concerning investigations of a complaint of child abuse and support all investigations with respect for civil law and the rights of individuals.



NOTE: Non-mandated reporters can also report suspected abuse anonymously if preferred.

REPORTING CHILD ABUSE AND NEGLECT (Sample 2)

A report must be filed with civil authorities concerning abuse of a child or young person who is now under the age of 18:

- **Civil law:** When a mandated reporter has reasonable cause to believe that a person under the age of 18 is suffering abuse or neglect, they are to report it immediately to the Department of Children and Families (DCF).

- **The Policy of (name of YSO)** requires all staff and volunteers to contact the appropriate civil authorities when that person has knowledge or reasonable cause to suspect that a person under eighteen (18) years of age is being, or has been, abused or neglected.

**MA Department of Children and Families
Local Area Office: (area code) -XXX-XXXX
After Hours Emergency: (800) 792-5200**

A person who was abused as a child but who is now an adult:

- **Civil law:** The person has the right to file a report with the local District Attorney (DA).

**Local Area DA:
(area code) XXX-XXXX**

The Statutes of the State of Massachusetts

The report to DCF must be made immediately by telephone and a written report submitted within 48 hours, containing:

- the names and addresses of the child and his parents or other person responsible for his care, if known;
- the child's age; the child's sex;
- the nature and extent of the child's injuries, abuse, maltreatment, or neglect, including any evidence of prior injuries, abuse, maltreatment, or neglect;
- the circumstances under which the person required to report first became aware of the child's injuries, abuse, maltreatment, or neglect;
- whatever action, if any, was taken to treat, shelter, or otherwise assist the child;
- the name of the person or persons making such report.

A report concerning suspected child abuse may also be made to (name of YSO) authorities.

Any person may ask to meet with the YSO head or Child Protection Team (CPT) concerning suspected child abuse by anyone - including YSO administrators, staff, or volunteers.

Contacts on the YSO Child Protection Team

**Name/Title
Name/Title
Business Hours: (area code) XXX-XXXX
After Hours: (area code) XXX-XXXX**

The policy of the (Name of YSO) also requires that all personnel and volunteers communicate:

- any complaints received concerning child abuse and neglect;
- copies of any report filed with civil authorities concerning child abuse and neglect;

to the YSO Child Protection Team or to (Name of YSO designated staff) within 24 hours

Policies and Procedures for Child Safety

Persons making a complaint about child abuse to the (name of YSO) will normally be asked to provide the following information:

- the name of the person against whom the complaint is made, and the name of the complainant;
 - a detailed description of the alleged abuse, including relevant dates, times, and circumstances;
 - the names and contact information for persons who may have knowledge of the alleged abuse.
- The (name of YSO) will cooperate with civil authorities concerning investigations of a complaint of child abuse and support all investigations with respect for civil law and the rights of individuals.

235

NOTE: In the event of imminent danger to a child, (Name of YSO) property, or to (Name of YSO) personnel responsible for the child, call the local (name of city/town/county) Sheriff's Office or Police Department for help: (area code) XXX-XXXX

Report of Child(ren) Alleged to be Suffering from Abuse or Neglect



Massachusetts law requires mandated reporters to immediately make a report to the Department of Children and Families (DCF) when they have reasonable cause to believe that a child under the age of 18 years is suffering from abuse and/or neglect by:

STEP 1: Immediately reporting by oral communication to the local DCF Area Office (see contact information at end of form); and

STEP 2: Completing and sending this written report to the local DCF Area Office within 48 hours of making the oral report.

For more information about requirements for mandated reporters and filing a report of alleged abuse and/or neglect please see **A Guide for Mandated Reporters** available on the DCF website at www.mass.gov/dcf.

Please complete all sections of this form. If some data is uncertain or unknown, please signify by placing a question mark (“?”) after the entry.

CHILDREN REPORTED Name	Current Location/Address	Language Spoken	Birth Sex		Age or Date of Birth	ICWA/Tribal Affiliation
			Male	Female		

EMERGENCY CONTACT(S) FOR CHILDREN REPORTED: Please list the emergency contact information for all of the reported children, including contact name, relationship, and contact number information.

OTHER CHILDREN: Please include information about other children in the home/family, including name and age/date or birth (if known).

PARENT, GUARDIAN OR CAREGIVER 1

Name: _____

First	Last	Middle
-------	------	--------

Address: _____

Street & Number	City / Town	State	Zip Code
-----------------	-------------	-------	----------

Phone #: _____ Age/Date of Birth: _____

Language Spoken: Relationship to Child(ren):

PARENT, GUARDIAN OR CARGIVER 2

Name:

First Last Middle

Address:

Street & Number City / Town State Zip Code

Phone #: Age/Date of Birth:

Language Spoken: Relationship to Child(ren):

REPORTER / REPORT

Report Date: Mandatory Report Non Mandatory Report

Reporter's Name:

First Last Middle

(If the reporter represents an institution, school or facility, please indicate)

Reporter's Address:

Street & Number City / Town State Zip Code

Phone #:

Has reporter informed caregiver of report? Yes No

What is the reporter's relationship to the child(ren)?

What is the nature and extent of injury, abuse, maltreatment or neglect? Please list any prior evidence of same and/or other worries regarding danger to the child(ren). (Please cite the source of this information if not observed firsthand.)

RELATED CONCERNS: Please check all that apply.

- Substance Use/Misuse Acute/Chronic Medical Condition Runaway
Substance Exposed Newborn Housing Instability/Homelessness Gang Involvement
Neonatal Abstinence Syndrome Human Trafficking* None Applies
Domestic Violence Sexual Exploitation* Unknown
Mental/Behavioral Health Challenges Teen Parenting Other

DESCRIPTION OF RELATED CONCERNS: Please include additional information that will help DCF further understand the concerns checked above. This includes any specific concerns about alcohol/drug use by the parent/guardian/caregiver. If there are concerns related to domestic violence, please also list any information that will help DCF make safe contact with the family (e.g., work schedule, place of employment, daily routines for the adult victim, etc.).

If known, please provide the name(s) and address, phone #, DOB/age, relationship to child, and language spoken of the person(s) responsible for the injury, abuse, maltreatment or neglect and/or any other information that you think might be helpful in establishing the cause of the injury, abuse, maltreatment or neglect.

*NOTE: These abuse allegations have been edited to reflect human trafficking (an umbrella term) to more clearly delineate Human Trafficking: Sexually exploited child, and Human Trafficking: Labor. Neither of these allegations require a caregiver in order to be screened in. Both allegations require a referral to the DA.

What are the circumstances under which the reporter became aware of the injury, abuse, maltreatment or neglect? Please include information on dates and timeframes for when the injury, abuse, maltreatment or neglect occurred.

Pedikit# (if applicable): _____ Incident Date (if known): _____

What action has been taken thus far to treat, shelter or otherwise assist the child(ren) to deal with the situation?

Are there any concerns for social worker safety?

Please provide any information about the family's strengths and capacities that you think will be helpful to DCF in ensuring the child's safety and supporting the family to address the abuse and/or neglect concerns.

Signature of Reporter: _____

To report child abuse and/or neglect: Weekdays from 9:00 am to 5:00 pm call the local DCF Area Office.
Weekdays after 5:00 pm and 24 hours on weekends and holidays call the
Child-At-Risk-Hotline 1-800-792-5200

DCF AREA OFFICES

Boston Region

Central Region

Northern Region

Dimock Street, Roxbury	617-989-2800	North Central, Leominster	978-353-3600	Cambridge/Somerville	617-520-8700
Harbor, Chelsea	617-660-3400	South Central, Whitinsville	508-929-1000	Cape Ann, Salem	978-825-3800
Hyde Park	617-363-5000	Worcester East	508-793-8000	Framingham	508-424-0100
Park Street, Dorchester	617-822-4700	Worcester West	508-929-2000	Haverhill	978-469-8800
Southern Region		Western Region			
Arlington	781-641-8500	Greenfield	413-775-5000		
Brockton	508-894-3700	Holyoke	413-493-2600		
Cape Cod & Islands	508-760-0200	Pittsfield	413-236-1800		
Coastal, Braintree	781-794-4400	Robert Van Wart Center, East Springfield	413-205-0500		
Fall River	508-235-9800				

DCF: What Happens When a Report is Made?

In November, 2015, DCF announced significant updates to its intake and response procedures. The new “Protective Intake Policy” framework was designed “to clearly articulate a primary and immediate focus on child safety in screening and responding to reports of child abuse and neglect.”⁸³ All DCF staff were trained in the new process and the changes were implemented statewide as of March, 2016.

The new Protective Intake Policy is divided into two phases: (1) the screening of all reports; and (2) a response to any report that is screened in. As a result of these changes, all screened in reports are now investigated. The updates to the screening and investigative response brought about by the new Policy are summarized below:

Screening

- Requires non-emergency reports of abuse and neglect to be reviewed and screened in or out in one business day—reduced from three days previously. Emergency reports continue to require an immediate screening decision and an investigatory response within two hours
- Introduces screening teams comprised of social workers, supervisors, and managers in all 29 area offices charged with reviewing certain reports of abuse or neglect as defined by the policy. Included in this are reports of three or more separate incidents in the past 12 months
- Mandates review of all information about the child and caregiver’s prior DCF involvement and review of any comparable information available from child welfare agencies in other states, including cases in which a parent has previously lost custody of a child
- Requires CORI (Criminal Offender Record Information), SORI (Sexual Offender Record Information), and national criminal history database checks of parents/caregivers and all household members over 15 years old
- Requires requests from law enforcement for information on 911 calls and police responses to the residence of any child or family involved in a report of abuse or neglect

Investigative Response

- Creates a single child protection response to all screened in reports that eliminates the practice of tiered or “differential response” at screening. All reports that are screened in will now be assigned for a response by an Investigation Trained Response Worker. The revised policy places decision-making regarding the

⁸³ DCF Protective Intake Policy: <http://www.mass.gov/courts/docs/lawlib/docs/protective-intake-policy-2-28-16.pdf>

appropriate level of Department intervention after the response -- the point at which the Department has interviewed the child and caregiver involved and substantially investigated the report of abuse or neglect

- Requires Response Workers to interview parents, caregivers and other children in the home as well as the person allegedly responsible for the abuse or neglect
- Enables Response Workers to search online sources for information relevant to assessing child safety
- Includes an assessment of parental capacity by evaluating whether the parent understands how to keep the child safe, uses appropriate discipline methods and provides for the family's basic needs, among other criteria
- Mandates use of the Department's Risk Assessment Tool to assess potential future risks to the child's safety.

The new policy framework also includes new staff and case supervision requirements, and clarifies circumstances that require supervisors to seek assistance from Department managers, attorneys or clinical specialists for collaborative review of complex cases.

In addition, DCF has updated the written form of the 51A report form. The revised form includes new sections that ask for emergency contact information for the children being reported, whether other children are implicated by the alleged abuse or neglect, and about "related concerns," including substance abuse and whether DCF social workers should be concerned for their safety when investigating an allegation.

What are the steps DCF takes when it receives a report of child abuse and/or neglect?

When DCF receives a report of abuse and/or neglect or "51A report," from either a mandated reporter or another concerned citizen, DCF is required to evaluate the allegations and determine the safety of the children. During DCF's response process, all mandated reporters are required to answer the Department's questions and provide information to assist in determining whether a child is being abused and/or neglected and in assessing the child's safety in the household.

Here are the steps in the DCF process:

- **The report is screened.** The purpose of the screening process is to gather sufficient information to determine whether the allegation meets the Department's criteria for suspected abuse and/or neglect, whether there is immediate danger to the safety of a child, whether DCF involvement is warranted and how best to target the Department's initial response. The Department begins its screening process immediately upon receipt of a report. During the screening process DCF obtains

information from the person filing the report and also contacts professionals involved with the family, such as doctors or teachers who may be able to provide information about the child's condition. DCF may also contact the family if appropriate.

- **If the report is “Screened-In”, it is assigned for a Response.** This response activity includes an investigation of the allegations, assessment of the current dangers and future risks to the child(ren) and an assessment of the capacity of the parent(s)/caregiver to provide safety, permanency and well-being of the child(ren). The severity of the situation will dictate whether it requires an emergency or non-emergency response.
- **A determination is made as to whether there is a basis to the allegation,** whether the child can safely remain at home and whether the family would benefit from continued DCF involvement. If DCF involvement continues, a Comprehensive Assessment and Action Plan are developed with the family.

Some families come to the attention of the Department outside the 51A process. These include:

Children Requiring Assistance (CRA) cases referred by the Juvenile Court, cases referred by the Probate and Family Court, babies surrendered under the *Safe Haven Act*, and voluntary requests for services by a parent/family. These cases are generally referred directly for a Comprehensive Assessment.

What are the timeframes for DCF to complete its Screening, Response and/Assessment?

- **Screening:** Begins immediately for all reports. For an emergency response, the screening is completed within two hours. For a non-emergency response, screening is completed in one working day (with an additional one working day extension in rare circumstances).
- **Emergency Investigation:** Must begin within two hours and be completed within five working days of the receipt of report.
- **Non-Emergency Investigation:** Must begin within three working days of receipt of report and be completed within 15 working days.
- **Comprehensive Assessment:** May take up to 45 working days.

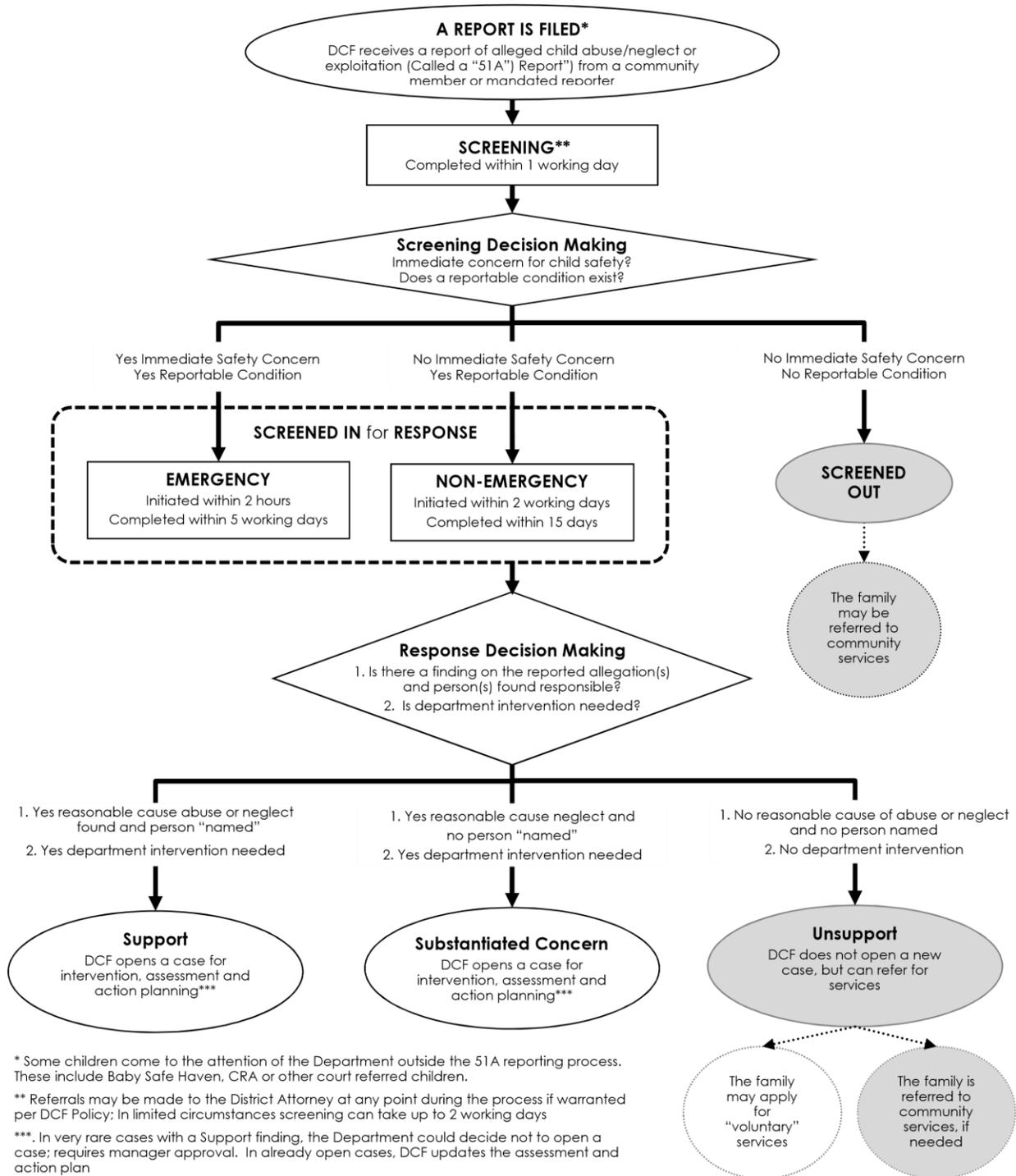
What if DCF screens out the report?

If available information is not sufficient for DCF to determine that there is reasonable cause to believe that a child has been abused or neglected, the report will be screened out. As such, it is important that the reporter provide the Department with all the information that might aid DCF in determining whether or not the alleged abuse or neglect occurred. It is wise to have as much information available as possible when calling the Department. However, if the reporter does not have all this information, do not let it impede the filing. File with what information is on hand and let the professionals make their determinations.

Having documentation of relevant facts, dates, quotes, etc., can help to ensure that information is accurately conveyed at the time the report is filed. Documentation can also facilitate the reporter's recollection of what has gone on with the child/youth over time. However, the decision to file or not file a report should not be based on the fact that the reporter thinks the documentation on hand is insufficient. Remember, mandated reporters are required to report if they have a reasonable cause to believe that a child or youth is suffering abuse or neglect. The suspected abuse or neglect must be immediately reported to the Department by oral communication and by making a written report within 48 hours after the oral communication.

If a report is screened out, it may also be because the alleged perpetrator of the abuse or neglect has been identified, and the individual was not in a caregiver role during the time when the abuse or neglect took place. With the exception of human trafficking allegations, cases where the alleged perpetrator was not in a caregiver role are beyond DCF's authority to address. In these situations, DCF contacts and refers the case to the District Attorney and local law enforcement. Also, if a report is screened out, it does not mean that the reporter cannot file another report at a later date. In the interim, documenting can help in establishing the reporter's own record of what is going on with the child or youth, and this information can be useful if you decide to file a report in the future. Again, the case that has received several reports, whether screened in or out, can be a source of critical information. In the meantime, help the child or youth by remaining available, acknowledging concerns, helping to enhance self-esteem, and giving the child/youth a positive experience. Staff and volunteers can be an invaluable source of support, and one should not underestimate the influence that they have on children and youth.

What Happens When DCF Receives a 51A Report?⁸⁴



⁸⁴ From MA DCF, Protective Intake Policy, Revision date: 2/28/16, used with permission

APPENDIX 12: Training About Child Sexual Abuse Prevention

Educating Children and Youth

All children and youth need to receive education about preventing abuse, neglect, bullying and harassment. This education is best adapted to an age-appropriate level to promote their understanding of, and confidence in the organization's strategies to keep them safe. However, not all YSOs will be capable of providing prevention training to the children/youth who attend their programs or utilize their services. In these cases, codes of conduct, mission statements, handouts on rules and regulations, orientation meetings, and other means of communication can be used to define for children and youth the elements of being safe. If it is within the scope of the YSO's responsibilities, children and youth should be provided an understanding of:

- Their right to be safe and cared for.
- Basic, age-appropriate information about emotional, physical, sexual abuse and neglect, bullying and harassment.
- Prevention strategies to help keep them safe in their home, family, community, and on the Internet.
- Where and how to report abuse, bullying and harassment.
- How to help a friend who is being abused, bullied or harassed.
- The characteristics of healthy versus unsafe relationships.
- Violence prevention in dating and relationships.
- How organizations have a responsibility to keep youth safe and must report abuse (mandated reporting).

Critical Content for Training Children and Youth

- **Child sexual abuse information**
 - This information may be provided through partnerships with local schools or other organizations already providing CSA prevention training for youth.
 - Provide general information about child sexual abuse, including what constitutes appropriate, inappropriate, and harmful behavior from adults and other youth.
 - Youth need to know that no one, including other youth, has the right to force, trick, or coerce them or other children/youth into sexual situations and that sexual offenders, not their victims, are responsible for their behavior
 - Teach youth how to interact appropriately with each other. Discuss the importance of reporting sexual abuse

- Tell youth who they should report to when they experience or observe behaviors they believe are inappropriate or harmful
- Seek assistance from other organizations that have created personal safety programs if your organization is interested in implementing one

The chart below identifies some of the grade-appropriate learning standards and lesson objectives gathered from several sources.

	Learning Standards	Lesson Objectives
Grades K-3	<ul style="list-style-type: none"> • List rules for safety at home, school, community. • Distinguish among safe, unsafe, and inappropriate touch. • Demonstrate the use of assertive behavior, refusal skills, and actions intended for personal safety. 	<ul style="list-style-type: none"> • Identify general safety rules. • Identify the “always ask first rule.” • Identify safe and unsafe touches. • Identify the “touching rule.” • Identify and practice rules for personal safety: say no, get away, tell a grown-up. • Identify grown-ups you can go to for help.
Grades 4-6	<ul style="list-style-type: none"> • Describe actions & behaviors to protect oneself when alone at home or in the community. • Distinguish among safe, unsafe, & inappropriate touch. • Demonstrate the use of assertive behavior, refusal skills, and actions intended for personal safety. 	<ul style="list-style-type: none"> • Identify and practice safety rules when alone at home or in the community. • Summarize the difference between appropriate & inappropriate touch. • Describe what to do to protect oneself in situations involving unwanted or inappropriate touch. • Identify and practice skills for standing up to pressure from other people. • Summarize ways to respond to sexual abuse. • Identify appropriate sources for help.
Grades 7-9	<ul style="list-style-type: none"> • Distinguish between healthy & unhealthy interpersonal relationships. • Define sexual harassment in the context of schools and other youth settings. • Recognize sexual abuse and sexual assault. • Describe actions & behaviors to protect oneself from sexual abuse and how to seek help. 	<ul style="list-style-type: none"> • Examine the potential impact of healthy & harmful relationships. • Identify personal boundaries & practice communicating boundaries to others. • Identify & practice skills for dealing with both physical and online sexual harassment. • Identify the warning signs of potential danger in relationships. • Identify ways to stay out of danger in relationships. • Identify where help can be located.

Grades 10-12	<ul style="list-style-type: none"> • Define sexual assault terms and refamiliarize students with the general topic of sexual abuse. • Demonstrate prevention skills in a variety of scenarios and circumstances. • Understand the personal and community resources available if one is harassed or victimized. 	<ul style="list-style-type: none"> • Define and contrast aggressive, passive, and assertive behaviors. • Explain acquaintance rape, sexual assault, incest and trafficking as forms of child sexual abuse. • Understand laws regarding types of abuse and reporting guidelines. • Specify personal and local community resources for victims of sexual abuse. • List and explain several prevention guidelines. • Summarize facts on offenders, victims, and ways victims get trapped. • Classify options for victims to extricate themselves from the abusive environment.
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Elements to Consider when Identifying Potential Training Curricula for Children and Youth

- **Research - Child Personal Safety Instruction**
 - Programs are successful when they are based on the most current research in prevention education
 - Are rigorously evaluated
 - Begin as early as pre-Kindergarten
 - Use developmentally sequenced materials
 - Utilize active, systematic and specific skills training
 - Have multiple program components such as classroom training combined with parental involvement
 - Use interactive instructional techniques that provide children multiple opportunities to observe the desired behavior
 - Model the behavior and get feedback
 - Are instituted as a comprehensive part of the child's education - repeated many times during the school year
 - Instituted over several years of instruction

- **What Does the Research Say about Child Personal Safety Instruction?**
 - Majority of studies do not support contention that personal safety instruction produces fear and anxiety about safety issues in children participating in programs

- Children’s appropriate-touch recognition scores did not decrease significantly
 - Finkelhor and Dziuba-Leatherman Study, 1995⁸⁵: Found that some respondents reported that exposure to personal safety training resulted in more worry about abuse and more fear of adults, however, children with increased worry and fear were also children who along with their parents, reported having the most positive feelings about programs and the greatest utilization of skills
 - Casper Study, 1999⁸⁶: looked at characteristics of children with positive or negative reactions to a prevention program. One finding of the study: children who are generally more anxious and who feel that they have no control over what happens to them –especially girls – are more likely to become afraid of being touched inappropriately. Study recommended careful preparation and debriefing for these children to alleviate anxiety aroused by the program
- **Involving Parents**
 - Most successful prevention programs actively engage parents
 - Organizations should be encouraged to select curricula that include training materials for parents through information/education evenings, take-home papers and take-home family exercise sheets.
- **Developmentally Sequenced Curriculum**
 - Programs for younger students tend to be more rules-based (If someone tries to touch you in an inappropriate way, say “No”, get away, tell a grown-up)
 - Programs for older students contextualize the personal safety training within experiences appropriate to their developmental stage (being out of the house, being with groups, dating, babysitting, etc.).
- **Checklist for Choosing Child Personal Safety Curricula**
 - Includes skills building along with instruction
 - Strengthens child’s/youth’s self-confidence and self-esteem
 - Develops knowledge of basic safety skills
 - Distinguishes between appropriate and inappropriate touch
 - Instructs children/youth to be able to say “no” to unwanted overtures
 - Teaches children/youth self-protective skills

⁸⁵ Finkelhor, D., & Dziuba-Leatherman, J. (1995). Victimization prevention programs: A national survey of children’s exposure and reactions. *Child Abuse & Neglect*, 19, 129-139.

⁸⁶ Casper, R. Characteristics of Children Who Experience Positive or Negative Reactions to a Sexual Abuse Prevention Program (1999) *Journal of Child Sexual Abuse* Vol. 7, Iss. 4, 1999.

- Encourages disclosure by instructing children and youth to always tell an adult about inappropriate or unwanted behaviors
 - Instructs children/youth how to identify the private parts of their bodies using correct anatomical terms if appropriate for the community
 - Instructs children/youth how to identify an adult they can trust; the importance of talking to an adult if something bothers them and that some secrets need to be told
 - Instructs children/youth that adults sometime act inappropriately
 - Emphasizes the fact that inappropriate adult behavior is never the fault of the child or youth
 - Teaches children/youth that victims can be people of any age, size, color or sex
 - Teaches children/youth that adults of any age, size, color, or sex, and either strangers or people they know can have touching problems
 - Teaches children and youth that other children/youth can sometimes be confused about what safe and unsafe touching are and can also have touching problems
- **Presentation**
 - Grounded in theory and research
 - Localizes curriculum to fit specific community needs
 - Includes proper training for presenters, teachers, parents and community officials
 - Program and materials respect the developmental abilities and limitations of children at various ages
 - Includes training for developmentally and physically challenged children
 - Incorporates demonstrations and rehearsal of desired behavior of each child
 - Occurs on multiple occasions over several years and includes periodic reviews
 - Includes supplemental sessions to reinforce skills
 - Is interactive
 - Includes homework
 - Includes comprehensive evaluation
 - Includes parental involvement
 - Provides complete and accurate information about sex to older children, if appropriate for the community
- **Awareness**

- Fosters improved communication between a parent and a child about personal safety
- Fosters in children/youth the importance about adult supervision in their safety
- Requires the proper reporting of all child sexual or physical abuse
- Encourages parental or community involvement
- Promotes notification by responsible adults to the proper authorities of any perceived changes in a child's behavior after instruction
- Fosters the idea that children have the right to control what happens to their bodies and to protect themselves

Resources and reports that identify abuse prevention curricula that have been evaluated for effectiveness.

- CDC list of sexual violence prevention strategies:
<https://www.cdc.gov/violenceprevention/sexualviolence/prevention.html>
- National Sexual Violence Resource Center (NSVRC) document *Child Sexual Abuse Prevention: Programs for Children*
http://www.nsvrc.org/sites/default/files/Publications_NSVRC_Guide_Child-Sexual-Abuse-Prevention-programs-for-children.pdf
- NSVRC document *Preventing Child Sexual Abuse – A National Resource Directory and Handbook*
http://www.nsvrc.org/sites/default/files/Publications_NSVRC_Directories_A-National-Resource-Directory-Handbook-Preventing-Child-Sexual-Abuse.pdf
- NSVRC document *Child Sexual Abuse Prevention: Programs for Adults*
(<http://www.nsvrc.org/publications/child-sexual-abuse-prevention-programs-adults>)
- CDC Sexual Violence Prevention Technical Package:
<https://www.cdc.gov/violenceprevention/pdf/sv-prevention-technical-package.pdf>

Kirkpatrick's Four Levels of Training Evaluation in Detail

This grid illustrates the Kirkpatrick's structure detail, and particularly the modern-day interpretation of the Kirkpatrick learning evaluation model, usage, implications, and examples of tools and methods. This diagram is the same format as the one above but with more detail and explanation:

EVALUATION TYPE	EVALUATION DESCRIPTION AND CHARACTERISTICS	EXAMPLES OF EVALUATION TOOLS AND METHODS	RELEVANCE AND PRACTICABILITY
LEVEL 1 REACTION	<ul style="list-style-type: none"> ▪ reaction evaluation is how the delegates felt, and their personal reactions to the training or learning experience, for example: ▪ did the trainees like and enjoy the training? ▪ did they consider the training relevant? ▪ was it a good use of their time? ▪ did they like the venue, the style, timing, domestics, etc? ▪ level of participation ▪ ease and comfort of experience ▪ level of effort required to make the most of the learning ▪ perceived practicability and potential for applying the learning 	<ul style="list-style-type: none"> ▪ typically 'happy sheets' ▪ feedback forms based on subjective personal reaction to the training experience ▪ verbal reaction which can be noted and analyzed ▪ post-training surveys or questionnaires ▪ online evaluation or grading by delegates ▪ subsequent verbal or written reports given by delegates to managers back at their jobs 	<ul style="list-style-type: none"> ▪ can be done immediately the training ends ▪ very easy to obtain reaction feedback ▪ feedback is not expensive to gather or to analyze for groups ▪ important to know that people were not upset or disappointed ▪ important that people give a positive impression when relating their experience to others who might be deciding whether to experience same
LEVEL 2 LEARNING	<ul style="list-style-type: none"> ▪ learning evaluation is the measurement of the increase in knowledge or intellectual capability from before to after the learning experience: ▪ did the trainees learn what intended to be taught? ▪ did the trainee experience what was intended for them to experience? ▪ what is the extent of advancement or change in the trainees after the training, in the direction or area that was intended? 	<ul style="list-style-type: none"> ▪ typically assessments or tests before and after the training ▪ interview or observation can be used before and after although this is time-consuming and can be inconsistent ▪ methods of assessment need to be closely related to the aims of the learning ▪ measurement and analysis is possible and easy on a group scale ▪ reliable, clear scoring and measurements need to be established, so as to limit the risk of inconsistent assessment ▪ hard-copy, electronic, online or interview style assessments are all possible ▪ 	<ul style="list-style-type: none"> ▪ relatively simple to set up, but more investment and thought required than reaction evaluation ▪ highly relevant and clear-cut for certain training such as quantifiable or technical skills ▪ less easy for more complex learning such as attitudinal development, which is famously difficult to assess ▪ cost escalates if systems are poorly designed, which increases work required to measure and analyze

EVALUATION TYPE	EVALUATION DESCRIPTION AND CHARACTERISTICS	EXAMPLES OF EVALUATION TOOLS AND METHODS	RELEVANCE AND PRACTICABILITY
<p>LEVEL 3 BEHAVIOR</p>	<ul style="list-style-type: none"> ▪ behavior evaluation is the extent to which the trainees applied the learning and changed their behavior, and this can be immediately and several months after the training, depending on the situation: ▪ did the trainees put their learning into effect when back on the job? ▪ were the relevant skills and knowledge used ▪ was there noticeable and measurable change in the activity and performance of the trainees when back in their roles? ▪ was the change in behavior and new level of knowledge sustained? ▪ would the trainee be able to transfer their learning to another person? <p>is the trainee aware of their change in behavior, knowledge, skill level?</p>	<ul style="list-style-type: none"> ▪ observation and interview over time are required to assess change, relevance of change, and sustainability of change ▪ arbitrary snapshot assessments are not reliable because people change in different ways at different times ▪ assessments need to be subtle and ongoing, and then transferred to a suitable analysis tool ▪ assessments need to be designed to reduce subjective judgment of the observer or interviewer, which is a variable factor that can affect reliability and consistency of measurements ▪ the opinion of the trainee, which is a relevant indicator, is also subjective and unreliable, and so needs to be measured in a consistent defined way ▪ 360-degree feedback is useful method and need not be used before training, because respondents can make a judgment as to change after training, and this can be analyzed for groups of respondents and trainees ▪ assessments can be designed around relevant performance scenarios, and specific key performance indicators or criteria ▪ online and electronic assessments are more difficult to incorporate - assessments tend to be more successful when integrated within existing management and coaching protocols ▪ self-assessment can be useful, using carefully designed criteria and measurements 	<ul style="list-style-type: none"> ▪ measurement of behavior change is less easy to quantify and interpret than reaction and learning evaluation ▪ simple quick response systems unlikely to be adequate ▪ cooperation and skill of observers, typically line-managers, are important factors, and difficult to control ▪ management and analysis of ongoing subtle assessments are difficult, and virtually impossible without a well-designed system from the beginning ▪ evaluation of implementation and application is an extremely important assessment - there is little point in a good reaction and good increase in capability if nothing changes back in the job, therefore evaluation in this area is vital, albeit challenging ▪ behavior change evaluation is possible given good support and involvement from line managers or trainees, so it is helpful to involve them from the start, and to identify benefits for them, which links to the level 4 evaluation below

EVALUATION TYPE	EVALUATION DESCRIPTION AND CHARACTERISTICS	EXAMPLES OF EVALUATION TOOLS AND METHODS	RELEVANCE AND PRACTICABILITY
LEVEL 4 RESULTS	<ul style="list-style-type: none"> ▪ results evaluation is the effect on the business or environment resulting from the improved performance of the trainee - it is the acid test ▪ measures would typically be business or organizational key performance indicators, such as: ▪ volumes, values, percentages, timescales, return on investment, and other quantifiable aspects of organizational performance, for instance; numbers of complaints, staff turnover, attrition, failures, wastage, non-compliance, quality ratings, achievement of standards and accreditations, growth, retention, etc. 	<ul style="list-style-type: none"> ▪ it is possible that many of these measures are already in place via normal management systems and reporting ▪ the challenge is to identify which and how relate to the trainee's input and influence ▪ therefore it is important to identify and agree accountability and relevance with the trainee at the start of the training, so they understand what is to be measured ▪ this process overlays normal good management practice - it simply needs linking to the training input ▪ failure to link to training input type and timing will greatly reduce the ease by which results can be attributed to the training ▪ for senior people particularly, annual appraisals and ongoing agreement of key business objectives are integral to measuring business results derived from training 	<ul style="list-style-type: none"> ▪ individually, results evaluation is not particularly difficult; across an entire organization it becomes very much more challenging, not least because of the reliance on line-management, and the frequency and scale of changing structures, responsibilities and roles, which complicates the process of attributing clear accountability ▪ also, external factors greatly affect organizational and business performance, which cloud the true cause of good or poor results

Since Kirkpatrick established his original model, other theorists (for example Jack Phillips), and indeed Kirkpatrick himself, have referred to a possible fifth level, namely ROI (Return On Investment). In my view ROI can easily be included in Kirkpatrick's original fourth level 'Results'. The inclusion and relevance of a fifth level is therefore arguably only relevant if the assessment of Return On Investment might otherwise be ignored or forgotten when referring simply to the 'Results' level.

Learning evaluation is a widely researched area. This is understandable since the subject is fundamental to the existence and performance of education around the world, not least universities, which of course contain most of the researchers and writers.

While Kirkpatrick's model is not the only one of its type, for most industrial and commercial applications it suffices; indeed most organizations would be absolutely thrilled if their training and learning evaluation, and thereby their ongoing people-development, were planned and managed according to Kirkpatrick's model.

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Level 1 Evaluation Survey: Your opinions matter!

Instructions: The following questions are designed to find out your reaction to the instructor, course, and learning environment. Based on your feedback and other evaluation components we will determine if any changes are necessary. Thanks in advance for your feedback.

1. Did you like the training session about the CT Partnership for Long-Term Care?

Yes _____; no _____; somewhat liked or disliked _____

2. If yes, please skip to question # 4. If “no”, or “somewhat liked or disliked”, please answer question # 3:

3. Which of the following factors caused you to not to enjoy the class (please provide details for each check mark on the additional separate sheet provided):

- _____ Instructor Style
- _____ Class Content
- _____ Training materials
- _____ Training Room Location
- _____ Material and concepts too complicated
- _____ Not enough case studies
- _____ Too many case studies
- _____ Concepts that apply to my job not explained thoroughly
- _____ More time should be spent on case studies
- _____ Other: Please explain on the separate survey sheet about other training aspects you feel need improvement that will enhance the overall class experience.

4. Would you recommend this class to others in your unit?

5. Was the class content relevant to your work? If so, how do you feel the training will help you? If not, please explain.

6. If anything, what would you change about the class, and why?

Please provide any additional comments you feel would help with the evaluation of the class. Thank you for taking the time to provide your feedback.

Connecticut Department of Transportation Class Evaluation

Class Title:

Instructors Name:

Date:

Please tell me the three most important items you learned at this training session.

1) _____

2) _____

3) _____

Was there a certain topic that should have been covered more in-depth?

Was there a topic we should have spent less time on?

Please grade A-F

Evaluate instructor's effectiveness in the following:

Style and delivery

A B C D F

Responsiveness to participants

A B C D F

Knowledge of the subject matter

A B C D F

How would you rate this session?

A B C D F

What can we do to improve this class in the future?

(Continue on back if needed)

Thank you and have a great day!

CONNDOT COURSE
Evaluation

Session Title: _____

Trainer: _____

Date: _____

What portion of the presentation did you find...

Most helpful and why? _____

Least helpful and why? _____

How would you rate this session?

	<i>Least Effective</i>								<i>Most Effective</i>	
	1	2	3	4	5	6	7	8	9	10

Evaluate Trainer's effectiveness in the following:

Style and delivery

1	2	3	4	5	6	7	8	9	10
---	---	---	---	---	---	---	---	---	----

Responsiveness to participants

1	2	3	4	5	6	7	8	9	10
---	---	---	---	---	---	---	---	---	----

Knowledge of the subject matter

1	2	3	4	5	6	7	8	9	10
---	---	---	---	---	---	---	---	---	----

How will you apply the skills learned back on the job? _____

General comments are always welcome: _____

(Continue on back if needed)

Thank You!

Session Title: _____

Name (optional) _____

Instructor: _____

Date: _____

	Strongly Disagree	Disagree	Agree	Strongly Agree
1. The topics presented were what you expected of the training.	1	2	3	4
2. This training met your needs.	1	2	3	4
3. The training was of adequate length for the topics presented.	1	2	3	4
4. The instructor was responsive to the participants.	1	2	3	4
5. The instructor was knowledgeable in all topics presented.	1	2	3	4
6. The instructor provided adequate audio/visual aids.	1	2	3	4
7. The instructor's style and delivery was effective.	1	2	3	4
8. The facility provided a comfortable learning environment.	1	2	3	4
9. Breaks were provided when needed and were of adequate length.	1	2	3	4
10. Would recommend this training to other employees.	1	2	3	4

How would you rate this training overall? _____

Would you like participate in upcoming trainings? _____

What topics would you like presented in the future? _____

What can we do to make the training better? _____

Other comments: _____

Level I Evaluation for
Telephone Training Course
Lisa Carta Corriveau
April 29, 2009

For responses needing to be scored with a numerical value, please use the following scale:

1=Outstanding 2=Very Good 3=Good 4=Fair 5=Poor

1. How well did this training workshop address the "relevant issues" presented at the beginning of the presentation?

A. Pride in work and a sense of self-worth

1 2 3 4 5

B. Being empowered to choose your own attitude vs. reacting to a situation

1 2 3 4 5

C. Strategies to address different telephone situations

1 2 3 4 5

2. Which part of the Telephone Training Workshop did you enjoy the most and why?

3. Give one example of something you learned at this training course that you can immediately apply to your present job responsibilities at work.

4. Was there anything about the location for this workshop that impeded your ability to learn the concepts that were being taught?

5. The trainer was knowledgeable and well-prepared to teach this particular subject matter.

1 2 3 4 5

6. Ample time was allowed for questions and group participation.

1 2 3 4 5

7. Please list any suggestions you feel could improve this training course.

Training Evaluation

Training Attended: _____ Date: _____

Please indicate on the form below your impression of the training class you have just attended. Rate the training session based upon the following criteria.

In the interest of developing and maintaining a quality training program please feel free to comment in the space provided or use the back of the sheet in needed.

	Expectations				
	Low			High	
Curriculum					
1. The training meet my expectations	1	2	3	4	5
2. I will be able to use the knowledge gained from this course	1	2	3	4	5
3. The training objectives were identified and meet	1	2	3	4	5
4. Class materials were distributed and helpful	1	2	3	4	5
5. The presentation was organized and contributed to my knowledge	1	2	3	4	5
Instructors/Staff					
1. The presenters were knowledgeable in subject matter	1	2	3	4	5
2. The presenters meet the course objectives	1	2	3	4	5
3. Good training aids and audio visuals were used.	1	2	3	4	5
4. Class participation was encouraged	1	2	3	4	5
5. The presenters were responsive to the student's questions	1	2	3	4	5
Training Questions					
1. How would you rate this training class?	1	2	3	4	5
2. Did this class meet your training needs?	1	2	3	4	5
3. Was the training relevant to your work environment?	1	2	3	4	5

Comments: _____

Training Evaluation Level One

Course Title - 1 Help School Nurses Turn Asthma Chaos Into Quiet Control 3-13-09

Learning Objective # 2
 Each learner will make AIRS referrals for their asthmatic students with frequent hospitalizations or ED visits or high school absenteeism To decrease the # of school absences by 10%

	a lot	some	a little	none	specific highlights and/or suggested improvements?
Did I enjoy this course?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Did I learn gain new knowledge and get some new ideas?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Will I use the information and ideas at school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Do I think that the ideas and information will improve my effectiveness in helping children control their asthma?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Do you have any other comments or suggestions on The Power Point Slides? The presenters presentation style? The Flow of the Course? Your comments to this form will help to improve my SN training program on asthma

PRESENTER'S NAME:
 Elizabeth Reynolds.....

© Alan Chapman, a free resource from www.k12asthma.com.

Trainer Name	
Course Name and Number	
Location	
Date	
Trainee Name (optional)	

This feedback form will help us to evaluate how well our training has met your expectations and needs. Please check the square which best corresponds to your answer.

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
The course content was arranged so as to make the most effective use of the time allotted.					
The training material addressed all of the learning objectives that were discussed at the beginning of the course.					
The content was appropriate to my training needs and skill level.					
The course materials were easy to read and understand.					
The instructor was knowledgeable about the subject matter.					
I was encouraged to ask questions, voice my concerns and observations, and engage in discussion.					
The instructor used a variety of presentation methods (i.e. lecture, group discussion, activities and exercise, handouts, and audiovisuals) which met my learning needs.					
The instructor helped group members relate the concepts taught to their practice and provided examples for how to apply them to their daily job activities.					
The location was accessible and convenient.					
The time allocated was appropriate to the content of the training.					
The physical classroom environment was comfortable (i.e. room temperature, light, and seating).					
This class met my expectations.					
What I learned will improve the way I communicate and interact with all my clients/staff.					
I would recommend this training to others.					

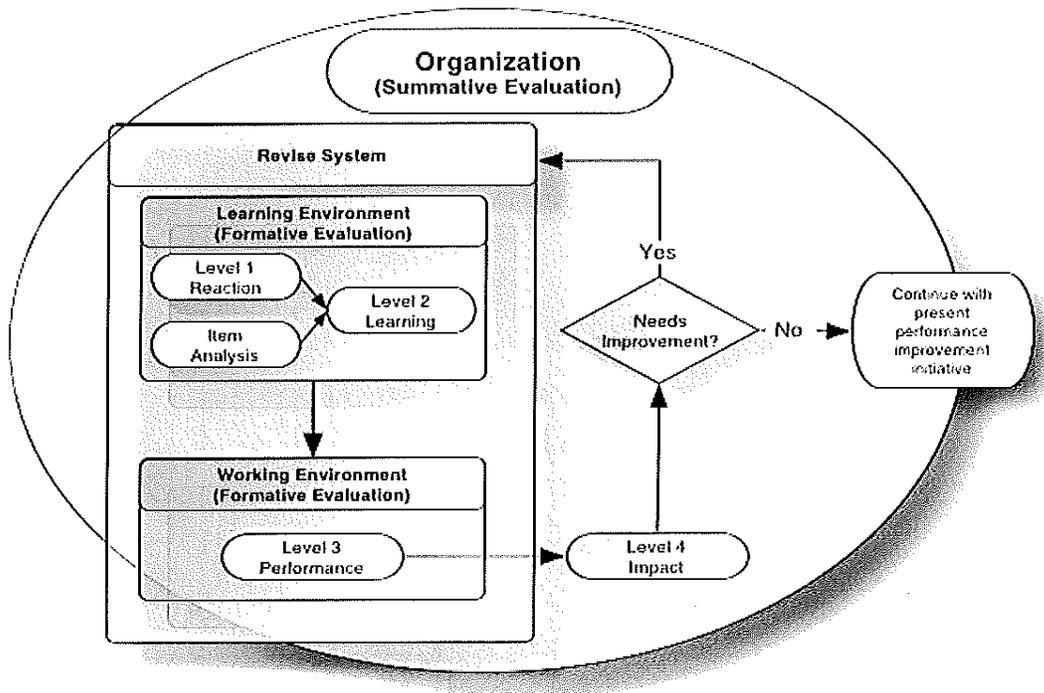
Please include additional comments on the back side of this sheet.

Thank you for your time and cooperation with this request.

Level One Evaluation: Reaction

In order to have a good discussion about Kirkpatrick's Level One Evaluation it is helpful to see Kirkpatrick's complete model of evaluation. Below is a diagram of Kirkpatrick's Four Levels of Evaluation Model (1994) of reaction, learning, performance, and impact.

The Kirkpatrick's Four Levels of Training Evaluation



Level One:

This is the first step of Kirkpatrick's evaluation process where students are asked to evaluate the training they attended after completing the program. These are sometimes called smile sheets or happy sheets because in their simplest form they measure how well students liked the training. Don't be fooled by the adjectives though, this type of evaluation can reveal useful data if the right questions are asked:

- The relevance of the objectives.
- The ability of the course to maintain interest.
- The amount and appropriateness of interactive exercises.
- The *perceived* value and transferability to the workplace.

The evaluation is generally handed out right at the completion of an instructor led class. With the increase of on-line and web based trainings the evaluations can also be delivered and completed online, and then printed or e-mailed to a training manager.

What is reaction in training evaluation? Simply put, it reports if participants liked or disliked the training. This would resemble a customer satisfaction questionnaire in a retail outlet. At the First Level of evaluation, the goal is to find out the reaction of the trainees to the instructor, course and learning environment. This can be useful for demonstrating that the opinions of those taking part in the training matter. A Level One evaluation is also a vehicle to provide feedback and allows for the quantification of the information received about the trainee's reactions.

The intent of gathering this information is not to measure what the trainee has learned, but whether the delivery method was effective and appreciated. Non-training items may have a deep impact on the training session and need to be considered. These items include, but are not limited to environmental and other conditions surrounding the learner at the time of training. Level One questions might include the following:

- Did the learner feel comfortable in the surroundings?
- Was it too cold or too warm in the room?
- Were there distractions?
- Was the time the training was conducted good for you?
- Was this an easy experience?

In gathering the data for this first step, it is important to do so soon after the training is completed. It is most presented as a form to be filled out by the learner. The following are some methods used to collect the data for Level One:

- Feedback forms – have the trainee relate their personal feelings about the training
- Conduct an *Exit Interview* – get the learner to express their opinions immediately
- Surveys and Questionnaires – gather the information some time after the training is conducted
- Online Evaluations – this might allow for more anonymous submissions and quicker evaluation of data
- On-the-job verbal or written reports – given by managers when trainees are back at work

The benefits of gathering Level One information are far-reaching. For example, the trainer or instructional designer may be misled into believing there is a shortcoming in the material presented, when it may have simply been an environmental issue. The data can be gathered immediately and most trainees participate readily because the information gathered is non-threatening and shows concern for their feelings. The information, in addition to ease of gathering, is not difficult to analyze. Finally, when a current group is relating a positive experience, other potential trainees are more at ease with a decision to learn.

There are those who dislike the Level One Evaluation and scoff at its results being scientific and controlled. Some suggest that just one question need be answered: "Would you recommend this course to a friend or colleague? Why or why not?"

Every training intervention needs some kind of feedback loop, to make sure that within the context of the learning objectives it is relevant, appropriately designed, and competently executed.

At Level I the intention is not to measure if, or to what extent, learning took place (that's Level 2); nor is it intended to examine the learner's ability to transfer the skills or knowledge from the classroom to the workplace (Level 3); nor does it attempt to judge the ultimate impact of the learning on the business (Level 4). Level I of Kirkpatrick's model is intended simply to gauge learner satisfaction.

The concern or disdain of the Level One Evaluation in many cases comes from poorly designed evaluations that may "steer" respondents. Too many close ended questions without room for comment limit attendee's comments. The type of questions asked can limit the areas the student is "allowed" to evaluate. Open ended questions while tedious may provide fuller feedback,

Trainers also need to understand that sound analytical evaluations often require multistage studies. Your end-of-course feedback may indicate a problem area, but will not tell you specifically what the problem is. A follow-up survey, by questionnaire, by informal conversation, or by holding a brief focus group, will tell you a great deal more than you could possibly find out under end-of-course conditions.

The level one evaluation none-the-less is an important first step. We need to remember the word *level one* does indeed imply there are more levels of evaluation. These successive evaluations will help dig deeper into the training experience and assist with identifying that your training programs helped move the organization toward realizing business outcomes. Understanding the objectives/outcomes of any training goal prior to class design will always be the key measure of a successful training program. Without precise and clear objectives the ultimate success of a training program cannot be measured.

The good news about the level one evaluation is that learners are keenly aware of what they need to know to accomplish a task. If the training program fails to satisfy their needs, a thoughtful evaluation will allow the opportunity to determine whether it's the fault of the program design or delivery.

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**Tool-1A: Example for Agriculture (Crop):
Taking Charge**

Please circle the number that best describes your answer.

As a result of this program, do you intend to:	No	Maybe	Yes	Already doing this
1. Apply conservation tillage practices?	1	2	3	4
2. Follow a crop rotation?	1	2	3	4
3. Follow minimum tillage practices?	1	2	3	4
4. Use crop residue as a ground cover?	1	2	3	4
5. Use cover crops?	1	2	3	4

Did the training workshop meet your expectation? 1. Yes 2. No

Would you recommend this training workshop to others? 1. Yes 2. No

If not, why: _____

What did you like the most about this training workshop?

What did you like the least about this training workshop?

How could this training be further improved?

Demographics

What is your gender? 1. Male
2. Female

How do you identify yourself?

1. African American	5. White
2. American Indian/Alaskan	6. Native Hawaiian/Pacific Islander
3. Asian	7. Other
4. Hispanic/Latino	

Share your name/address/phone number, if you are willing to allow us to contact you for follow-up comments (Optional).

Name: _____ Phone Number: _____

Address: _____

**Thank you for completing this evaluation.
We appreciate your input as we make every effort to improve Extension programs.**

Additional resources for training toolkits include:

- [The Universities of Washington and California Training Toolkit:](http://www.go2itech.org/HTML/TT06/toolkit/about/about.html)
<http://www.go2itech.org/HTML/TT06/toolkit/about/about.html>
- [The Sex Abuse Treatment Center:](http://satchawaii.com/get-involved-child-abuse-prevention-toolkit.aspx)
<http://satchawaii.com/get-involved-child-abuse-prevention-toolkit.aspx>
- [The Substance Abuse and Mental Health Services Administration:](https://www.samhsa.gov/capt/applying-strategic-prevention-framework)
<https://www.samhsa.gov/capt/applying-strategic-prevention-framework>