

Creating Organizational Policies to Prevent Sexual Abuse

By Joan Tabachnick, MPPM

"I've heard more about sexual abuse than I have the heart or brain receptors for and then of course I feel guilty for not wanting to pay attention to such a rotten thing."

~ Grandparent

Given the choice, no one really wants to think about or talk about child sexual abuse. It is painful to take in or to even imagine how someone could harm a child in that way. When it does come up for parents, it is usually dealt with as an individual problem. How do I protect my own child? How do I talk with my child without scaring him/her? What do I do when I am concerned about my (coach's, teacher's, camp counselor's, clergy's, etc.) behavior? How do I report an allegation of sexual abuse? All of these questions and the issue of child sexual abuse may seem like a huge and complex puzzle with the full picture just out of grasp.

The tragic events of sexual abuse in the Catholic Church, Penn State, Horace Mann School, and the hundreds of other schools, camps, sports organizations, and faith-based communities have all set the stage for a deeper conversation about child sexual abuse prevention. These publicized cases of sexual abuse in honored institutions have begun to generate a very different conversation about prevention in each of our own communities. These difficult events have raised the notion that organizations have a significant role to play in protecting our children. Imagine how different these stories would have been if these organizations had created a culture where child sexual abuse is discussed, addressed, and ultimately prevented. Imagine how different it would have been for the children involved if the adults had been confronted at the very first time any boundary was crossed and the children got help before any were harmed.

OPPORTUNITIES FOR PREVENTION

Every year 35 million adults come into contact with more than 70 million children and teens through youth-serving organizations (Saul & Audage, 2007). As awareness of sexual abuse within these organizations grows, so does fear of sending a child into harm's way and of the tragedies that are emerging in the media. To gather a sense of how families and parents are taking in the media stories about youth-serving organizations, a short request for feedback was sent out on a number of neighborhood email lists asking: "What would make you read an article about child sexual abuse prevention within youth-serving organizations?" The first parent who responded said:

"To be honest, I don't allow my children to participate in typically male supervised sports activities because I don't want to validate a stranger and open up the possibility of my sons being sexually abused by a person I have endorsed as 'trustworthy.'"

~ Parent of two young children

Unless parents are offered concrete solutions about what they can do, more parents will withdraw their children from situations that might pose a danger to their child. If organizations are not informed about effective prevention strategies, they may choose to ignore the issue (e.g., it does not happen here) or implement policies that don't work (e.g., "no touch" policies in sports camps rather than an understanding of professional and personal

boundaries). Fortunately over the last 10 years, organizations as varied as the Unitarian Universalist Society, Big Brothers and Big Sisters of America, the American Camp Association, and the Centers for Disease Control and Prevention have taken concrete steps towards creating child sexual abuse prevention policies and guidelines (Arevalo et.al., 2006; Commit to Kids, 2011; Haffner, 2005; John Jay College of Criminal Justice, 2011; Saul & Audage, 2007). Each of these organizations is examining how they can prevent sexual abuse from happening in the first place. Each is also asking the important question, if a child is harmed, how can we ensure that we are doing everything possible to respond appropriately? As each of these organizations confronts the reality of sexual abuse, they often come to the realization that it is not a question of "If this will happen" but rather "When this happens, can we respond to inappropriate behaviors? And how do we ensure that we are doing everything possible to respond appropriately when sexual abuse does occur?"

OVERVIEW OF ORGANIZATIONAL PREVENTION PRACTICES

"What kinds of things should I expect programs to do to prevent child sexual abuse at their institutions? Should I ask programs about this or would I be viewed as paranoid?"

~ Parent of a teenager

Over a variety of programs and in a number of research articles, six sexual abuse prevention policies and practices—listed in Box 2.1—have consistently been identified as helpful for youth-serving organizations (Commit to Kids, 2011; Haffner, 2005; Parent & Demers, 2011; Patterson & Oliver 2002; Saul & Audage, 2007; Wurtele, 2012). For organizations thinking about sexual abuse prevention for the first time, even this short list can be overwhelming. To be successful, every organization must make a commitment to begin the process of implementing sexual abuse prevention and safety policies. And once implemented, they must also consider how to inform people (e.g., staff, volunteers, parents, children, and the community) about the content of these prevention and safety policies. Some organizations will view the implementation of these safety policies as an important and necessary step. Other organizations may actively embrace the process and see these policies as a competitive advantage—to be able to tell the community that their organization is a safe place for youth to learn and grow.

Box 2.1

Six Organizational Policies and Practices to Prevent Sexual Abuse

1. Screening staff and volunteers
2. Responding to allegations of sexual abuse
3. Educating staff, volunteers, parents, and children
4. Creating a code of conduct
5. Modifying physical spaces with safety in mind
6. Matching prevention policies to an organization's mission and unique vulnerabilities



Ideally, an organization should hire a consultant to advise them on the process of developing child sexual abuse prevention policies. However, for smaller organizations which cannot afford this, the Enough Abuse Campaign has developed a series of recommendations for organizations to follow. Like Mothers Against Drunk Driving which made simple suggestions for friends and family to follow when confronting a difficult situation, the Enough Abuse Campaign recommends that all organizations start with three basic elements:

- **Screen** staff and volunteers;
- **Respond** to inappropriate behavior, breaches in policy, and allegation of sexual abuse; and
- **Educate** everyone within an organization about child sexual abuse prevention.

Additionally, three more policies may be critical to an organization's mission and should be considered and added to the core recommendations:

- Creating a code of conduct;
- Modifying physical spaces; and
- Matching specific policies to an organization's mission and unique vulnerabilities (e.g., extra supervision for mentoring program).

Each of these will be discussed in detail below.

Once a plan is in place and the policies have been implemented, it will be easier for an organization to respond to a parent who may want to know what the organization is doing to keep their children safe. These questions should be encouraged as a way of building trust for those parents who are willing to give their children or teens the kinds of experiences only possible when the child or adolescent is exploring his/her own interests and what it means to be in the world.

THREE BASIC ELEMENTS OF A PREVENTION AND SAFETY PLAN

Screen

The screening and hiring of staff or volunteers provides an organization the opportunity to let everyone know that the organization cares deeply about the safety of children and teens and also establishes the first barrier to anyone who might sexually abuse a child. The typical screening process includes a written

application, an interview, two to three reference checks, and in some cases, a criminal background check. In addition to these elements, an organization may also want to inform any applicant about the organization's policies and commitment to preventing child sexual abuse. Some organizations do this by showing a short video to every applicant and others do it as part of the basic interview. During the interview, some organizations may ask the applicant about what they would do in a particular scenario or a direct question such as "Is there anyone who might suggest that you should not work with youth? Why or why not?" By adding these components to the existing process, the organization is sending a clear message that it is not a safe place for anyone who might be at risk to sexually abuse or harm a child in any way. Last, an easy additional check is to conduct a simple internet search of the individual to find any additional relevant material. (If any information is used from this source, it should be verified that it is the correct individual.)

Respond

An organization must be able to respond to a variety of behaviors such as 1) inappropriate behaviors between two youth or between youth and adults; 2) breaches in organizational policies; and 3) evidence or allegations of child sexual abuse. If an organization has never made a report of sexual abuse, it can be helpful to call the local child protection services office to make a connection and to learn about the specifics of the reporting process. Once that call is made, it will be easier to pick up the phone when there is an allegation or suspicion of abuse. Once the organization understands the reporting process, they can develop an internal process to ensure that the organization can consistently respond to any allegation or suspicion of sexual abuse. The basic process should include clear procedures about:

- how someone makes a report to child protective services and what information is needed;
- when to inform the executive director or the director of the program to ensure that he or she is always aware of a report made to child protective services;
- if the allegation is against an employee, how to effectively remove the employee from any direct contact with children; and
- how to ensure that the alleged victim and family are given any support they need.

In many ways, the reporting process is fairly easy to implement. However, it is equally important to have a process in place to address any concerning behavior between staff and youth or between two youth. To create this kind of process, the organization will need to define the continuum of appropriate, inappropriate, and harmful behaviors. Some organizations have simplified this and talk about behaviors that are green light (healthy), yellow light (concerning and needing to be addressed by the organization), and red light (behaviors to report) (Johnson, 2012).

Box 2.2

Examples of Boundary Violations

- Giving special or personal gifts to an individual youth
- Remarking on a youth's physical attributes or development
- Discussing personal troubles or intimate issues with a youth
- Showing unnecessary physical affection in public or, especially, in private spaces
- Excessive calling, texting, or other contact with a particular youth

Educate

Child sexual abuse thrives in an environment of silence. An organization that makes a commitment to talk openly about the issue; train administrators, staff, volunteers, parents, and youth; and enforce established policies sends a clear message that this is a safe place for youth and NOT a safe place for someone to sexually abuse a child. According to the Centers for Disease Control report on youth-serving organizations (Saul & Audage, 2007), critical educational content includes information about: child sexual abuse with opportunities to actually talk about the issue; healthy development of youth; personal and professional boundaries; red flags (warning signs) for potential boundary violations; and, the organization's child sexual abuse prevention policies and procedures. Researchers and prevention programs provide many examples of boundary violations by adults, some of which are listed in Box 2.2 (Wurtele, 2012; Tabachnick, 1998).

Every time an organization implements and then enforces their prevention policies, it sends a clear message that **this** organization cares deeply about the safety of children and adolescents and is willing to deal with whatever comes up.

THREE ADDITIONAL ELEMENTS OF A PREVENTION AND SAFETY PLAN

Once these basic three elements (screen, respond, educate) are in place, an organization can more easily address a parent's concerns and safely respond when an allegation of abuse has been made. With these basic policies established, the organization may also want to consider three additional elements in a prevention plan that protects children from the vulnerabilities of that particular setting or organizational mission.

Code of Conduct

A Code of Conduct outlines the responsibilities, boundaries, and proper practices for an organization. A Code of Conduct allows the organization to set the standards for age-appropriate, healthy interactions between individuals of all age groups: adults, adults and youth/children, and between youth/children. It can also set clear boundaries about what is and what is not appropriate behavior for an individual and what the consequences will be. Some organizations will use a Code of Conduct to define when responsibility for a child is handed to the organization and when it is handed back to the parent/guardian, restrictions on certain activities (e.g., social media), and ratios of staff to youth. When policies and a Code of Conduct are enforced through supervision, staff meetings, and all of the organizations' venues, it becomes easier for staff to talk about their concerns and highlight the smaller day-to-day behaviors that give them some concern.

"It was easy for me as a teacher. There is a support system, meetings at which we were frequently reminded that even a small suspicion needed to be reported whether we were sure or not. Parents and guardians don't have that luxury—it is a much bigger decision for them to raise a concern about the adult in charge of their child. They are in the thought mode of accusation, where teachers are in an 'I think' mode."

~High school teacher

Physical Space

Architects have known for years that physical space—the building and grounds of an organization—has a direct influence on how

people interact with each other within the organization. The strategies that an organization must consider in preventing sexual abuse will depend upon the physical space they occupy and how that space is used. The key strategies to consider when reviewing the building and grounds used by an organization are to:

- Increase visibility: Choose or modify spaces to ensure that they are visible to multiple people. This can include putting a window in every door of a classroom or landscaping a playground in a manner that ensures that all children are visible at all times.
- Monitor all points of access: Ensure that there is a protocol for how youth are left with the organization and when they are picked up. Organizations may also have a protocol for monitoring any outside visitors. For organizations without a central facility (for example, mentoring programs) extra supervision might be considered. This could include extra meetings with the adults in charge of youth or planned events where the behaviors and interactions between adults and youth can be easily observed.
- Enhance security: Consider installing monitoring devices and/or personnel to ensure that the space is secure and that safety policies are being implemented. Extra lighting, directing visitors through one central area, and convex mirrors can help augment the security system.

Additional Mission-Driven Policies

Each organization's mission helps to guide the actions of the organization, articulates the organization's goals, and helps to guide future decision making. The mission may also identify unique needs or challenges that the organization faces when considering how to keep children and teens safe. For example, a mentoring program provides one of the key protective factors that can lead to a child's resiliency—an adult outside of the family the child can trust. But this kind of program also opens opportunities for abuse to be perpetrated. Given the mission of a mentoring program, the sponsoring organization would not want to implement a "two adult rule" or limit the mentoring activities to a single facility. In this case, safety and prevention policies would begin with an enhanced screening and hiring process and more rigorous supervision of all staff. Another example is that of a faith-based organization that must fulfill its mission of ministering to everyone, while ensuring that all children are safe. In this case, the organization may need to have a policy about how to safely allow someone who has been convicted of a sexual offense to pray with the congregation, and yet limit that person's access from events or activities that might include children or teens (Haffner, 2013).

CONCLUSION

Youth-serving organizations are established to create a safe environment for children and adolescents to grow, learn, and explore, and to provide part of the foundation for them to develop into healthy adults. Participation in these programs provides children and teens important protective factors against sexual abuse such as increased self-esteem, relationships with adults outside of the home who can be role models, and new friendships with peers. Unfortunately, as the public's awareness of child sexual abuse grows, they may view these same situations as opportunities for sexual abuse to be perpetrated.

Denial of the problem is not a viable option. As shown in the Penn State scandal, an organization's desire to protect their reputation and good work through a policy of silence and cover up devastates the lives of many children and puts even more at risk. Fortunately, more and more organizations are choosing to implement safety and child sexual abuse prevention policies.

Box 2.3

Additional Resources

Resources for Organizations

Preventing Child Sexual Abuse within Youth-Serving Organizations: Getting Started on Policies and Procedures. US Centers for Disease Control and Prevention. Free report. www.cdc.gov/ncipc/dvp/preventingchildsexualabuse.pdf

The Season of Hope: A Risk Management Guide for Youth-Serving Nonprofits. Nonprofit Risk Management Center. \$20. www.nonprofitrisk.org/store/pub_detail.asp?id=36

Commit to Kids: Helping Organizations Prevent Child Sexual Abuse. Canadian Centre for Child Protection. Free overview and \$75 for kit. www.commit2kids.ca/app/en/

GateKeepers for Kids: A Practical Guide to Make Your Organization Safer. Enough Abuse Campaign. Free report. www.enoughabuse.org

Specific Topic Reports

Recommendations to the Amateur Athletic Union from the Youth Protection and Adult/Volunteer Screening Task Forces. Free report. image.aausports.org/dnn/pdf/TFreportfinal.pdf

Balancing Acts: Keeping Children Safe in Congregations. Unitarian Universalist Association. www.uua.org/safe/children

Every time an organization implements and then enforces their prevention policies, it sends a clear message that this organization cares deeply about the safety of children and adolescents and is willing to deal with whatever comes up.

In the long run, the real tragedy of the Penn State, Horace Mann School, Catholic Church, or hundreds of other cases will be

measured by how we respond to these tragedies. The courage of the children or young men and women to come forward and talk about the details of what was done to them demands that we match that courage with our own. Child sexual abuse is preventable, and there is a role for every organization and every parent. Take time today to find out what your organization has done or what it can do to make the world safer for all of our children and adolescents (see Box 2.3 for additional resources). What does that mean? Ask every organization working with children and teens if they know how to report an allegation of abuse or a situation that they suspect is abuse. Ask every organization what they would do if they see behaviors in an adult or teen that might be inappropriate. Ask every organization if they have policies in place to ensure that adults know how to respond and ultimately prevent sexual harm.

Imagine a world where every parent begins to ask these questions before they send a son or daughter to an after-school program or summer camp—and they are not labeled “that parent...” Imagine if funding agencies or legislators began to require these policies before the organization receives any state or federal funding. Although this would not make up for the past abuse or turn the clock back for the children who are living with the impacts of past sexual abuse every day, it would help protect other children from similar situations. It might make it harder for someone to sexually abuse boys or girls and it might make someone reach out for help if they know that they might be at risk to sexually abuse a child. This would be a new piece of the complex puzzle we need to put into place to truly protect our children and adolescents. →



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