



Wachusett Mountain Associates is committed to ensuring the safety and well-being of our (students/program participants). We hold all staff, regardless of position, to the highest possible standards. We require all staff to be screened regularly and sign a code of conduct. All staff will be monitored when interacting with (students/program participants). We take any inappropriate interactions between (students/program participants) and with staff very seriously and will fully cooperate with authorities in any case of abuse.

Table of Contents

I.	General Definitions.....	3
A.	Types of abuse	3
II.	Code of Conduct with Youth	4
III.	Policies.....	7
A.	Physical Contact	7
B.	Verbal Interaction	8
C.	One-on-One Interaction	8
D.	Off-site Contact.....	9
E.	Electronic Communication	10
F.	Gift Giving.....	11
IV.	Monitoring and Supervision.....	12
A.	Checking Members into a Facility:.....	12
B.	General Supervision.....	12

C.	Monitoring Youth in Facilities.....	13
D.	Monitoring High Risk Activities	14
1.	Bathroom Activities	14
2.	Transition Times and Free Times	14
3.	Teen Leadership Program	14
E.	Supervisors and Administrators Monitoring On-Site Programs	15
V.	Responding	16
A.	Responding to Suspicious or Inappropriate Behaviors or Policy Violations.....	16
1.	Staff and Volunteer Response:.....	16
2.	Supervisor and Administrator Response:.....	17
3.	Organizational Response:	18
B.	Responding to Suspected Abuse by an Adult	18
1.	Staff or Volunteer Response to Abuse:.....	18
2.	Supervisors and Administrators Response to Abuse:	19
C.	Responding to Youth-to-Youth Sexual Abuse and Sexualized Behaviors	19
1.	Youth-to-Youth Interactions:.....	19
2.	Staff and Volunteer Response:.....	20
3.	Supervisors and Administrators Response:.....	21
4.	Organizational Response:	21

I. General Definitions

A. Types of abuse

1. Physical abuse is injury that is intentionally inflicted upon a youth.
2. Sexual abuse is any contact of a sexual nature that occurs between a youth and an adult or between two youths. This includes any activity which i meant to arouse or gratify the sexual desires of the adult or the other youth.
3. Emotional abuse is mental or emotional injury to a youth that results in an observable and material impairment in the youth's growth, development, or psychological functioning.
4. Neglect is the failure to provide for a youth's basic needs or the failure to protect a youth from harm.

II. Code of Conduct with Youth

The following policies are intended to assist staff and volunteers in making decisions about interactions with youths. For clarification of any guideline, or to inquire about behaviors not addressed here, contact your supervisor.

Our organization provides our youths with the highest quality services available. We are committed to creating an environment for youths that is safe, nurturing, empowering, and that promotes growth and success.

No form of abuse will be tolerated and confirmed abuse will result in immediate dismissal from our organization. All reports of suspicious or inappropriate behavior with youths or allegation of abuse will be taken seriously. Our organization will fully cooperate with authorities if allegations of abuse are made that require investigation.

The Conduct with Youth outlines specific expectations of the staff and volunteers as we strive to accomplish our mission together.

1. Youths will always be treated with respect.
2. Youths will be treated regardless of race, sex, age, or religion.
3. Staff and volunteers will adhere to uniform standards of displaying affection as outlined by our organization.
4. Staff and volunteers will avoid affection with youths that cannot be observed by others.
5. Staff and volunteers will adhere to uniform standards of appropriate and inappropriate verbal interactions as outlined by our organization.
6. Staff and volunteers will not stare at or comment on youths' bodies.
7. Staff and volunteers will not date or become romantically involved with youths.
8. Staff and volunteers will not use or be under the influence of alcohol or illegal drugs in the presence of youths.
9. Staff and volunteers will not have sexually oriented materials, including printed or online pornography, on our organization's property.
10. Staff and volunteers will not have secrets with youths and will only give gifts with prior permission.
11. Staff and volunteers will comply with our organization's policies regarding interactions with youths outside of our programs.
12. Staff and volunteers will not engage in inappropriate electronic communication with youths.

13. Staff and volunteers are prohibited from working one-on-one with youths in a private setting. Staff and volunteers will use common areas when working with individual youths.

14. Staff and volunteers will not abuse youths in anyway including (but not limited to) the following:

Physical abuse: hitting, spanking, shaking, slapping, unnecessary restraints

Verbal abuse: degrading, threatening, cursing

Sexual abuse: inappropriate touching, exposing oneself, sexually oriented conversations

Mental abuse: shaming, humiliation, cruelty

Neglect: withholding food, water, shelter

15. Our organization will not tolerate the mistreatment or abuse of one youth by another youth. In addition, our organization will not tolerate any behavior that is classified under the definition of bullying, and to the extent that such actions are disruptive, we will take steps needed to eliminate such behavior.

Bullying is aggressive behavior that is intentional, is repeated over time, and involves an imbalance of power or strength. Bullying can take on various forms, including:

- a. *Physical bullying* – when one person engages in physical force against another person, such as by hitting, punching, pushing, kicking, pinching, or restraining another.
- b. *Verbal bullying* – when someone uses their words to hurt another, such as by belittling or calling another hurtful name.
- c. *Nonverbal or relational bullying* – when one person manipulates a relationship or desired relationship to harm another person. This includes social exclusion, friendship manipulation, or gossip. This type of bullying also includes intimidating another person by using gestures.
- d. *Cyberbullying* – the intentional and overt act of aggression toward another person by way of any technological tool, such as email, instant messages, text messages, digital pictures or images, or website postings (including blogs). Cyberbullying can involve:
 - Sending mean, vulgar, or threatening messages or images.
 - Posting sensitive, private information about another person.
 - Pretending to be someone else in order to make that person look bad.
 - Intentionally excluding someone from an online group.
 - Hazing – an activity expected of someone joining or participating in a group that humiliates, degrades, abuses, or endangers that person regardless of that person's willingness to participate.
 - Sexualized bullying – when bullying involves behaviors that are sexual in nature. Examples of sexualized bullying behaviors include sexting, bullying that involves exposures of private body parts, and verbal bullying involving sexualized language or innuendos.

Anyone who sees an act of bullying, and who then encourages it, is engaging in bullying. This policy applies to all youths, staff and volunteers.

16. All staff must follow state specific mandatory reporting requirements. Staff should be trained to be aware of and understand their legal and ethical obligation to recognize and report suspicions of mistreatment and abuse. Staff will:
 - a. Be familiar with the symptoms of child abuse and neglect, including physical, sexual, verbal, and emotional abuse.
 - b. Know and follow organization policies and procedures that protect youths against abuse.
 - c. Report suspected child abuse or neglect to the appropriate authorities as required by state mandated reporter laws.
 - d. Follow up to ensure that appropriate action has been taken.
17. Staff and volunteers will report concerns or complaints about other staff, volunteers, adults, or youths to our organization's supervisor.
18. Our organization cooperates fully with the authorities to investigate all cases of alleged abuse. Any staff or volunteer shall fully cooperate possible in any external investigation by outside authorities or internal investigation conducted by the organization or persons given investigative authority by the organization. Failure to cooperate fully may be grounds for termination.
19. Staff and volunteers may not have engaged in or been accused or convicted of youth abuse, indecency with a youth, or injury to a youth.

III. Policies

Policies define the bandwidth of acceptable behavior in an organization. Because offenders often violate policies to gain access to youths, when staff know and understand policies, they can identify, interrupt, and report policy violations. Simply interrupting a policy violation can prevent a false allegation of abuse or put an offender on notice that no one works in private, the rules apply to everyone, and violations will be detected.

A. Physical Contact

Our organization's physical contact policy promotes a positive, nurturing environment while protecting youths and staff. Our organization encourages appropriate physical contact with youths and prohibits inappropriate displays of physical contact. Any inappropriate physical contact by staff towards youths in the organization's programs will result in disciplinary action, up to and including termination of employment.

The organization's policies for appropriate and inappropriate physical interactions are:

<i>Appropriate Physical Interactions</i>	<i>Inappropriate Physical Interactions</i>
<ul style="list-style-type: none">• Side hugs• Shoulder-to-shoulder or "temple" hugs• Pats on the shoulder or back• Handshakes• High-fives and hand slapping• Verbal praise• Pats on the head when culturally appropriate• Touching hands, shoulders, and arms• Arms around shoulders• Holding hands (with young children in escorting situations)	<ul style="list-style-type: none">• Full-frontal hugs• Kisses• Showing affection in isolated area• Lap sitting• Wrestling• Piggyback rides• Tickling• Allowing a youth to cling to a staff's or volunteer's leg• Any type of massage given by or to a youth• Any form of affection that is unwanted by the youth or the staff or volunteer• Compliments relating to physique or body development• Touching bottom, chest, or genital areas

B. Verbal Interaction

Staff and volunteers are prohibited from speaking to youths in a way that is, or could be construed by any observer, as harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning, or humiliating. Staff and volunteers must not initiate sexually oriented conversations with youths. Staff and volunteers are not permitted to discuss their own sexual activities with youths.

Our organization's policies for appropriate and inappropriate verbal interactions are:

<i>Appropriate Verbal Interactions</i>	<i>Inappropriate Verbal Interactions</i>
<ul style="list-style-type: none">• Positive reinforcement• Appropriate jokes• Encouragement• Praise	<ul style="list-style-type: none">• Name-calling• Discussing sexual encounters or in any way involving youths in the personal problems or issues of staff and volunteers• Secrets• Cursing• Off-color or sexual jokes• Shaming• Belittling• Derogatory remarks• Harsh language that may frighten, threaten or humiliate youths• Derogatory remarks about the youth or his/her family

C. One-on-One Interaction

Most abuse occurs when an adult is alone with a youth. Our organization aims to eliminate or reduce these situations and prohibits private one-on-one interactions unless approved in advance by the organization administration.

In those situations where one-on-one interactions are approved, staff and volunteers should observe the following additional guidelines to manage the risk of abuse or false allegations of abuse:

Additional Guidelines for One-on-One Interactions

- When meeting one-on-one with a youth, always do so in a public place where you are in full view of others.
- Avoid physical affection that can be misinterpreted. Limit affection to pats on the shoulder, high-fives, and handshakes.
- If meeting in a room or office, leave the door open or move to an area that can be easily observed by others passing by.
- Inform other staff and volunteers that you are alone with a youth and ask them to randomly drop in.
- Document and immediately report any unusual incidents, including disclosures of abuse or maltreatment, behavior problems and how they were handled, injuries, or any interactions that might be misinterpreted.

1. Tutoring/ Private Coaching:

One-on-one situations, such as tutoring and private coaching sessions, introduce additional risks for false allegations. Staff and volunteers should be aware of our policies regarding tutoring and private coaching:

- a. Staff and volunteers must have supervisor approval for any tutoring or private coaching sessions.
- b. Tutoring and coaching sessions with our organization's youths may not occur outside of the organization.
- c. Supervisors must keep a schedule of private tutoring and coaching sessions, which should include times, youths involved, and location of sessions.

D. Off-site Contact

Many cases of organizational abuse occur off-site and outside of regularly scheduled activities. This contact outside of regularly scheduled activities may put staff, volunteers, and our organization at increased risk.

Our organization prohibits interactions outside of regularly scheduled program activities unless approved by the organization's Administration.

<i>Appropriate Outside Contact</i>	<i>Inappropriate Outside Contact</i>
<ul style="list-style-type: none"> • Taking groups of youths on an outing • Attending sporting activities with groups of youths • Attending functions at a youth's home, with parents present 	<ul style="list-style-type: none"> • Taking one youth on an outing without the parents' written permission • Visiting one youth in the youth's home, without a parent present • Entertaining one youth in the home of staff or volunteers • A lone youth spending the night with staff or volunteers

In addition, when outside contact is unavoidable, ensure that the following steps are followed:

1. Supervisors should identify for staff and volunteers what types of outside contact are appropriate and inappropriate.
2. Ensure that staff or volunteers have the parents' permission to engage in outside contact with the youth. Consider requiring the parents to sign a release-of-liability statement.

E. Electronic Communication

Any private electronic communication between staff and youths, including the use of social networking websites like - Facebook, Instagram, Snapchat, instant messaging, texting, etc. - is prohibited. All communication between staff and youths must be transparent.

The following are examples of appropriate and inappropriate electronic communication:

<i>Appropriate Electronic Communication</i>	<i>Inappropriate Electronic Communication</i>
<ul style="list-style-type: none"> • Sending and replying to emails and text messages from youths ONLY when copying in a supervisor or the youth's parent • Communicating through "organization group pages" on Facebook or other approved public forums • "Private" profiles for staff and volunteers which youths cannot access 	<ul style="list-style-type: none"> • Harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning or humiliating comments • Sexually oriented conversations • Private messages between staff and volunteers with youths • Posting pictures of organization participants on social media sites • Posting inappropriate comments on pictures • "Friending" participants on social networking sites

In addition, provide this information to your participant's parents so that they know what is appropriate and inappropriate from your staff.

1. Cell Phone Use:

While assigned to work with youths, staff are not permitted to use electronic communications device except during approved breaks and emergency situations. Internet use, text messaging and/or emailing pictures while assigned to work with youths is strictly prohibited regardless of the type of device used and whether for business or personal reasons. Staffs need to ensure that friends and family members are aware of this policy.

Use of personal electronic communication devices to contact (via voice, text, or pictures/video) organization members and/or program participants for personal and/ or inappropriate reasons shall be grounds for discipline up to and including termination of employment.

2. Acceptable Use of Cell Phones during Program Hours:

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

- a. Off-site Programs
- b. Emergencies

F. Gift Giving

Molesters routinely groom youths by giving gifts, thereby endearing themselves to the youth. They might instruct the youth to keep the gifts a secret, which then starts teaching the youth to keep secrets from parents. For this reason, staff and volunteers should only give gifts to groups of youths, and only under the following circumstances:

- 1. Administration must be made aware of and approve the gift.
- 2. Parents must be notified.

IV. Monitoring and Supervision

When staff are adequately supervised, potential offenders are less likely to act on their impulses because they face detection. When youths are adequately supervised, they too are less likely to engage in inappropriate interactions with others. Similarly, the physical plant must be monitored, particularly out-of-the-way locations or locations that might permit an offender undue access to or privacy with a youth. Effective supervision and monitoring require that a variety of methods be used frequently, at both scheduled and random times.

A. Checking Members into a Facility:

1. When anyone (members, guests, residents, construction workers, maintenance, cleaning crews, etc.) enters the facility during operational hours, they must check in with the front desk.
2. When possible, create a single point of entry and exit in the facility.
3. If there is more than one entrance or exit, ensure these other points of access are consistently monitored.

B. General Supervision

General supervision procedures:

1. **Administrative and Supervisory Visits to Youth Programs-** Youth supervisors and administrators will regularly visit all youth programs to ensure that all activities are well-managed and that youth policies are observed by all in attendance.
2. **Ratios-** Each program will follow the ratio requirements that are directly to the goals of the program and the design of the program area. The staff or volunteer-to-youth ratio should be adjusted for programs that serve youths with special needs. Refer to local licensing requirements and general best practice guidelines for establishing adult-to-youth ratios.
3. **Mixed Age Groups-** In most incidents involving one youth abusing another youth, the youths are from different age groups. Each program is responsible for establishing specific guidelines for additional monitoring and supervision of activities that involve youths from different age groups. Staff and volunteers must be aware that close line of sight supervision is required when monitoring programs that mix age groups.

C. Monitoring Youth in Facilities

Generally, youths under the age of 12, or 7th grade, should not be alone in the facility without a parent or guardian present. By this age, most youths have had the experience of being without immediate parental supervision. In addition, 12-year-old youths can use self-protection skills if they are approached inappropriately by another youth or by an adult.

However, we also recognize that many youth serving programs are compelled to permit younger children to access the facilities for many reasons.

That said, because the program is responsible for all youths in the facility, we recommend implementing the following practices:

1. Require a parent or legal guardian to complete an application which includes identifying information, any special medical or behavioral circumstances, any legal indemnifications, the youth's date of birth, and emergency contact information. In addition, require all youths to sign-in AND to sign-out of the facilities so that the program has a record of the youth who are always in the facility.
2. While in the facility, youths can be supervised directly, indirectly, or with a combination of the two techniques.
 - a. For direct supervision, the program may offer structured, scheduled activities like ski school, arts and crafts, etc. These activities should have one or more staff assigned to lead and supervise.
 - b. For indirect supervision, the program must designate certain building areas as authorized areas. Authorized areas could include a gymnasium, a game area, or a classroom for doing homework and so on. Authorized areas must be easily visible and routinely and systematically checked by staff. Youths should know that they will always be supervised by staff, and all staff should know which areas are authorized and which are not.
3. Develop supervision standards for the authorized areas. For example:
 - a. Determine how frequently authorized areas should be monitored by staff.
 - b. Assign staff specific supervision responsibilities over authorized areas.
 - c. Require staff to record when they monitor authorized areas: this may be accomplished by using checklists. All program staff should wear nametags or identifying clothing so that the youth can easily recognize them as staff.
4. Train all staff:
 - a. To greet youths that enter the facility; to direct youths to the structured activities or authorized areas; and, to redirect youths who are not in an authorized area or who are not participating in a structured activity.
 - b. To be aware of the risks involved with mixing age groups and how to monitor activities involving mixed age groups.
 - c. To routinely monitor high risk areas (such as bathrooms, locker rooms, and unused rooms). Wachusett recommends designating specific staff to supervise these areas (i.e., Managers on Duty). This staff should document the scheduled and periodic sweeps of high-risk locations.

Ultimately, all kids must always be supervised, regardless of age. The key to remember is that they can be supervised directly in structured activities and indirectly when they are in authorized areas.

D. Monitoring High Risk Activities

1. Bathroom Activities

Most incidents of youth-to-youth abuse occur in the bathrooms. Therefore, the following supervision guidelines are recommended:

When supervising restroom use, adult staff members should first quickly scan the bathroom before allowing youths to enter.

- a. For “Group Bathroom Breaks”:
 - Require staff to take groups of two or more youths to the bathroom – following the “rule of three” or more.
 - If the bathroom only has one stall, only one youth should enter the restroom while the others wait outside with the staff.
 - If there are multiple stalls, only send in as many youths as there are stalls.
 - Minimize youths of different ages using the bathroom at the same time.
 - Require staff to stand outside the bathroom door but remain within earshot.
- b. For single use restrooms:
 - Require youths to ask permission to use the bathroom.
 - Require all staff to frequently check bathrooms.
- c. Prohibit staff from using the bathroom at the same time as youths.
- d. If assisting young youths in the stalls, the staff should keep the door to the stall open.

2. Transition Times and Free Times

Transition times and free-choice times (or free times) pose a high risk for incidents because during these times, staff and volunteers may not be assigned a group of youths to supervise. To decrease the risk of incidents, implement the following procedures:

- a. Always require youths to remain in line-of-site of staff.
- b. Specify the staff-to-youth ratio.
- c. Specify narrow geographic boundaries in the program areas.
- d. Ensure that all staff are assigned specific areas to supervise (“zone monitoring”).
- e. Include bathroom procedures.
- f. Require periodic roll calls for each age group.
- g. Require supervisors to conduct periodic check-ins and sweeps of the entire activity area.

3. Teen Leadership Program (Apprentice)

Older youths who participate in teen leadership programs are still youth participants and not staff or volunteers. Therefore, even though they are often given more responsibility, teens in the leadership programs must be provided with guidelines regarding appropriate behavior, and then supervised accordingly. In addition, staff and volunteers must understand and recognize that these teens are still youths and not their peers. Therefore, the following guidelines are recommended for teen leadership programs:

- a. Create a screening process for teen leaders which includes
 - A standard application
 - An interview with behaviorally based interview questions

- References (from teachers, counselors, family friends, etc.)
- b. Train teen leaders in their role in programs and on program policies about appropriate and inappropriate interactions. This training should include the following information:
 - Appropriate and inappropriate physical and verbal interactions and the importance of maintaining behavioral boundaries between teen leaders and younger youths and between teen leaders and staff and volunteers.
 - Prohibiting teen leaders from being one-on-one with youths.
 - Prohibiting teen leaders from escorting youths to the bathrooms.
 - Prohibiting teen leaders from assisting youths with changing their clothes.
- c. Create a system to monitor the teen leaders.
 - Designate a specific staff or volunteer who oversees the teen leadership program and its participants.
 - Require teen leaders to wear clothing or lanyards that identify them as leaders-in-training and differentiate them from both staff and volunteers and from younger youths.
 - Require a supervisor to conduct daily check-ins with teen leaders and their program supervisors.
 - Consider requiring teen leaders to keep a log documenting their daily activities and any problems they encounter. The program supervisor should review these logs daily.

E. Supervisors and Administrators Monitoring On-Site Programs

Keep a record. Document your supervision visits. Include information like your arrival and departure times, which youths and parents were present, and a summary of the information collected. Provide staff with feedback about visits.

Vary your observation times. Do not develop a predictable pattern of observation. Drop in at different times each day. Occasionally leave and come back immediately.

Arrive before staff. Check punctuality and the routine that staff follow to prepare for the youths to arrive.

Survey the physical environment. Is this a suitable location for the activity (e.g. size of area for number of youths, ability to supervise all areas used by youths, landscaping that may inhibit supervision)?

Watch activities. Are they planned and organized? Are the staff actively involved? Ask to see the schedule of activities and compare with what is going on at a given time.

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

Observe Interactions.

V. Responding

How an organization responds to suspicious or inappropriate interactions, policy violations, and incidents or allegations of abuse can dramatically affect the harm to the individuals involved and the damage to the organization. Once a staff member, volunteer, youth, or parent has expressed a concern or made an allegation about the treatment of a youth, swift and determined action must be taken to reduce any subsequent risk to the youth, to the accused staff member or volunteer, and to the organization. Organizations must establish precise, unequivocal requirements for reporting to the authorities and for adhering to a serious-incident response plan.

A. Responding to Suspicious or Inappropriate Behaviors or Policy Violations

Because our organization is dedicated to maintaining zero tolerance for abuse, it is imperative that every staff member actively participates in the protection of youths. If staff observe any suspicious or inappropriate behaviors and/or policy violations on the part of other staff or volunteers, it is their personal responsibility to immediately report their observations.

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

<i>Examples of Suspicious or Inappropriate Behaviors Between Staff/Volunteers and Youth</i>	
<ul style="list-style-type: none">• Violation of the abuse prevention policies described above• Seeking private time or one-on-one time with youths• Buying gifts for individual youths• Making suggestive comments to youths• Picking favorites	

All reports of suspicious or inappropriate behavior with youths will be taken seriously. Our procedures will be carefully followed to ensure that the rights of all those involved are protected.

1. Staff and Volunteer Response:

If staff witness suspicious or inappropriate behaviors or policy violations from another staff or volunteer, the staff or volunteer is instructed to do the following:

Guidelines for Staff/Volunteers Response to Suspicious or Inappropriate Behaviors and/or Policy Violations

- Interrupt the behavior.
- Report the behavior to a supervisor, director, or other authority.
- If you are not comfortable making the report directly, make it anonymously.
- If the report is about a supervisor or administrator, contact the next level of management.
- Document the report but do not investigate.
- Keep reporting until the appropriate action is taken.

2. Supervisor and Administrator Response:

If a supervisor or an administrator receives a report of suspicious or inappropriate behaviors or policy violations from a staff member or volunteer, the supervisor is instructed to do the following:

Guidelines for Supervisors and Administrators Response to Suspicious or Inappropriate Behaviors and/or Policy Violations

- Report to the next level of administration and determine the appropriate administrator to respond to the concern.
- Determine the appropriate response based on the report.
- Speak with the staff or volunteer who has been reported.
- Review the file of the staff or volunteer to determine if similar complaints were reported.
- Document the report on the appropriate form.
- If at any point in gathering information about a report of suspicious or inappropriate behavior, a concern arises about possible abuse, contact the state authorities and file a report.
- If appropriate, notify parents and/or guardians.
- Advise the person who reported the behavior that the report is being taken seriously.

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

- a. Increase monitoring or supervision of the staff, volunteer, or program.
- b. If policy violations with youths are confirmed, the staff or volunteer must be subject to disciplinary action up to and including termination and prosecution. Disciplinary action will follow the Progressive Disciplinary Process outlined in this manual.
- c. If more information is needed, interview and/or survey other staff and volunteers or youths.

3. Organizational Response:

Guidelines for Organizational Response

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

F. Responding to Suspected Abuse by an Adult

1. Staff or Volunteer Response to Abuse:

As required by mandated reporting laws, staff and volunteers must report any suspected abuse or neglect of a youth—whether on or off organization property or whether perpetrated by staff, volunteers, or others—to state authorities. Reports may be made confidentially or anonymously. A person who mistakenly reports suspected abuse is immune from civil or criminal liability if the report was made in good faith and without malice.

In addition to reporting to state authorities, staff and volunteers are required to report any suspected or known abuse of youths perpetrated by staff or volunteers directly to leadership so that immediate and proper steps may be taken to ensure the safety of alleged victims and others who may be at risk. Reports of suspected or known abuse may be made confidentially to the following:

- a. Immediate supervisor
- b. Directors
- c. Administrators

Additional Guidelines for Staff/Volunteer Response to Incidents or Allegations of Abuse

- If you witness abuse, interrupt the behavior immediately.
- If abuse is disclosed to you, assure the individual disclosing that he or she was correct to tell you.
- Protect the alleged victim from intimidation, retribution, or further abuse.
- Immediately report the allegation or incident to the proper organization authorities (based on mandatory reporting requirements) and the designated authority.
- Be sure to document the incident, disclosure, or any circumstances causing your suspicion of abuse. State only the facts.
- It is not your job to investigate the incident, but it **IS** your job to report the incident to your supervisor in a timely manner.
- Check back to make sure appropriate steps were taken. If not, report again to your supervisor or the designated organization authority.

2. Supervisors and Administrators Response to Abuse:

In addition to the above response procedures, supervisors and administrators should ensure the following:

Guidelines for Supervisor and Administrators Responding to Allegations or Incidents of Abuse

- First, determine if the youth is still in danger and if so, take immediate steps to prevent any further harm.
- Gather as much information about the allegation as you can. For example, who made the report, who was allegedly abused, who was the alleged abuser, what was the nature of the alleged abuse, where and when did the alleged abuse occur, etc.
- Accurately record everything you learn in as much detail as you can. Remember your notes may be read by others. Stick to the facts.
- Contact the appropriate local authorities as indicated by your mandatory reporting procedures. Make sure you get a case number and the name and contact information of the person with whom you speak at the reporting agency.
- If the alleged abuse involves a staff member or volunteer, notify your crisis management team and follow your crisis management plan.
- Suspend the accused staff or volunteer until the investigation is completed.

G. Responding to Youth-to-Youth Sexual Abuse and Sexualized Behaviors

The thought that one youth may sexually abuse another youth does not occur to many people. Unfortunately, abuse between peers has increased 300% in the past few years. Youth-to-Youth sexual activity and sexualized behaviors often remain unreported in organizations because staff and volunteers are not comfortable documenting these situations or may not know how.

1. Youth-to-Youth Interactions:

Most serious incidents of youth-to-youth abuse are preceded by more subtle incidents such as name-calling, taunting, or roughhousing. Interrupting these interactions early and establishing and communicating standards of conduct can keep the program environment safe. Our organization recognizes that the following interactions are high risk and should be prohibited:

Prohibited Youth-to-Youth Interactions

- Hazing
- Bullying
- Derogatory name-calling
- Games of Truth or Dare
- Singling out one child for different treatment
- Ridicule or humiliation

In order to adequately respond to and track incidents within the organization, all sexual activity between youths and sexualized behaviors of youths must be consistently documented.

2. Staff and Volunteer Response:

Youth-to-youth sexual behaviors can include inappropriate touching, exposing body parts, using sexualized language, making threats of sexual activity, engaging in sexual activity, and similar types of interactions.

If staff witness youth-to-youth sexual behaviors, they are instructed to follow these guidelines:

Guidelines for Staff and Volunteers Responding to Youth-to-Youth Sexual Activity

- If you observe sexual activity between youths, you should immediately separate them.
- Calmly explain that such interactions are not permitted and separate the youths.
- Notify your supervisor.
- Complete the necessary paperwork including what you observed and how you responded.
- Follow your supervisor's instructions regarding notifying the authorities and informing the parents of the youth involved.
- In some cases, if the problem is recurring discipline may be required including not allowing one or both youths to return to the program.

3. Supervisors and Administrators Response:

If a supervisor or administrator receives a report of a youth's sexualized behavior or youth-to-youth sexual activity, the supervisor should do the following:

Guidelines for Supervisors and Administrators Responding to Youth-to-Youth Sexual Activity

- Meet with the staff who reported the sexual activity to gather information.
- Confirm that the youths involved have been separated or placed under increased supervision.
- Review the steps taken by the staff on duty.
- Review the incident report to confirm it is accurately and thoroughly completed.
- Meet with parents of the youths involved.
- Determine what actions should be taken to make sure there is no recurrence, including assessing the suitability of the program for the children involved.
- Notify the proper authorities.
- Develop a written corrective action or follow-up plan in response to the incident

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

- d. Review the need for additional supervision
- e. Review the need for revised policies or procedures
- f. Review the need for additional training
- g. Alert others in the organization

4. Organizational Response:

After the internal review of the sexualized behavior or youth-to-youth sexual activity, the organization will determine what can be done to prevent a reoccurrence, such as:

Guidelines for Organizational Response

- Review the need for additional supervision.
- Review the need for revised policies or procedures.
- Review the need for additional training.
- Alert others in the organization.