Child Sexual Abuse Prevention
Boundary Policy Considerations in Schools

On-Site Boundaries - Access

- Secure the **facility** and limit access to students
  - **Walls** or fences surrounding campus
  - Funnel visitors through **one entry point**
  - Install a **visitor management system**
  - All visitors to wear **visitor badges**
  - **Staff to stop** anyone not wearing a visitor’s badge
- Establish a criminal **background check** policy
  - New hires, substitutes, contract providers, volunteers
  - Fingerprint based, national, recurring, multi-state
  - Local child protective services
  - Public records, internal database, industry databases
- Restrict and/or monitor access of **registered sex offenders** (RSOs)
  - Board policy for handling **unannounced RSOs**
    - Who will recognize them?
    - How will you ask them to leave?
  - Board policy for handling **parent RSOs** requesting permission to come on campus
    - Will they be allowed on school campus?
    - How will they be supervised?
    - Who will be notified
- Restrict and monitor **internet access and use of technology**
  (limit what they can access, not what they cannot access)
  - Applicable use policy for **students**
    - District issued equipment use anywhere
    - Personal equipment use on district property
  - Applicable use policy for **staff**
    - District issued equipment use anywhere
    - Personal equipment use on district property

On-Site Boundaries - Isolation

- Ensure all rooms where students are allowed have **windows in the doors**
  - Windows should always be **unobstructed**
- Establish **safe and unsafe locations** for students
  - Do a site inspection
  - Document, communicate, and enforce unsafe off-limits locations
- Avoid **one adult - one student** situations
  - Move to a public location or join another adult
  - Notify supervisor if unable to resolve the situation
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- Establish a **two-adult policy** with infants, toddlers, special needs students, nap time, movies and other lights out activities and, wherever possible
- Limit the number of people who can pull students out of their **regularly scheduled program activities** (including lunch and recess)
  - Create a pre-approved board policy including:
    - Who can pull them out?
    - Why can they pull them out?
    - When, how often and for how long?
    - Where can they go?
    - How will they be supervised on the way and on arrival?
    - Who is notified when they are pulled out?
  - Board approval required for exceptions
- Limit **before and after school** activities to pre-approved programs
  - Create a pre-approved board policy for before and after school activities including:
    - What program activities are pre-approved?
    - Who can host pre-approved program activities?
    - How often can they meet?
    - When, how often, and for how long can they meet?
    - Where can they meet?
    - What supervision is provided while they meet?
    - Who is notified that they will meet?
  - Board approval required for exceptions
- Establish a practice of **no family members** working or volunteering together
  - Family members working or volunteering together count as one adult, not two
    - They are unlikely to stop or report abusive behavior
    - Spouses are protected by privileged communication and cannot be subpoenaed to testify
- Ensure you have an **observable diapering area**
- Establish a practice of **monitoring all bathrooms** used by students
  - Staff or fully screen volunteer monitor placed just outside the entrance to the bathroom
    - Can hear students inside the bathroom
    - Can be seen from outside the bathroom
- Designate and schedule **rovers**
- Install **video cameras** in pre-school classrooms, special ed classrooms, and other high-risk areas such as buses
  - Live monitoring, if possible
  - Set extended retention time
- Provide **parents access** and supervision options such as:
  - Parent volunteer programs
  - Video camera or observation area for special needs students
On-Site Boundaries - Behavioral

- Restrict employees from taking photographs of students unless an approved activity or there are two adults present
  - Create a pre-approved board policy including:
    - Who needs to take photos or videos?
    - Why do they need to take them?
    - Where can they take them and of whom?
    - When can they take them?
    - Whose equipment can be used?
    - Who should be present to supervise?
    - How do they request approval?
    - Who is notified of date/time/purpose?
  - Board approval required for exceptions
- Ban unprofessional behavior including off-color comments/compliments, flirting, snapping bras or underwear, hanging out together, & preferential treatment
- Establish a no intimidation - no manipulation policy.
- Establish a policy of no sexual discussions or exposing students to pornography or other sexually explicit material
- Keep physical touch between staff and students in your care to an absolute minimum. Off limits kinds of touch include:
  - Kissing - even on the cheek
  - Massage - unless by a physical therapist and only in the presence of another adult
  - Stroking of hair or any other part of the body
  - Front-to-front or front-to-back hugs, use side hugs, high fives, or fist bumps instead
  - Sitting on laps
  - Physical horseplay, piggy back rides, or tickle games
  - Assisted instruction that includes body-to-body touching such as baton or musical instruments
  - Excessive touching of any type
- Establish appropriate locker room boundaries, including:
  - No showering or changing with students
  - Same gender monitors
  - Monitor from a distance
  - No photo or video equipment allowed in the locker room
- Limit medical exams and treatment by staff members to treatment of minor injuries or dispensing medications
- Prohibit staff from using alcohol, prescription drugs, or street drugs with students in your care
- Establish a policy of no hands in other's people's pockets
- Establish a practice of keeping hands where they can be seen
- Establish a policy of no use of masks, blindfolds, bondage, scatting, fetishisms, or rituals
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**Off-Site Boundaries**

- Restrict employees from taking students of-site unless it is part of a pre-approved school sanctioned event:
  - Establish a **pre-approval process** for taking students off-site including:
    - **Why** are students being taken off-site?
    - **Where** are acceptable locations for off-site activities?
    - Has an **on-site inspection** been done to ensure all other boundaries can be enforced?
    - **Who** can take students off-site?
    - **When, how often, and for how long** can they take them?
    - How will they be **transported safely**?
    - What level of **supervision** is required and how covered?
    - Require **written authorization** requests at least 8 weeks in advance
    - Require **two approval signatures** from designated approvers
  - Board approval required for **exceptions**
- **Permission slips** sent and signed by parents (should include all details)
- Use district owned or hired **transportation** to off-site locations, no use of personal vehicles
- **Additional boundaries** for **out-of-town travel**
  - **Constant supervision** for all students
  - **Two adults** per hotel room or cabin with students
  - **No alcohol or drug** use by staff or volunteer chaperones
  - Volunteers must be **fully screened**

**Off-Hours Boundaries**

- Establish a policy where **staff members do not**:
  - **Babysit** students or their siblings
  - **Tutor** students or their siblings
  - **Visit** student’s **residences** or vice versa
  - **Host** **sleepovers** for students
  - Attend students’ **birthday parties, quinceañeras**
  - Attend students’ **family gatherings**
  - Attend students’ **extra-curricular activities**
  - **Date** students

**Electronic and Social Media Boundaries**

- Establish a policy that **prohibits staff members from**:
  - Sharing personal **phone numbers**
  - Sharing **e-mail addresses** or screen names
  - Becoming “**friends**” on Facebook “**following**” on Twitter, etc.
  - Making connections on **multimedia** sharing sites such as Instagram or **video chat** apps like Snapchat
  - Using **ghost apps** to communicate with students
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- Require personnel to set restrictive privacy settings and use appropriate profile pictures

**Student-to-Student Boundaries**

- Provide full visibility and close monitoring during nap time
- Avoid unmonitored bathroom visits
- Separate programs by age and developmental level
- Avoid direct or inadvertent creation of authority
- Provide close supervision
- Immediately correct inappropriate behavior
- Communicate concerning behavior to others in your organization as needed and notify effected parents
  - Not part of an existing relationship
  - Power differential exists
  - Done in isolation or told to keep it secret
  - Behavior continues even when told to stop
  - Includes feelings of shame, guilt, fear, anxiety
  - Complaints from other children
  - Causes pain to other kids (physical, emotional)
  - Accompanied by anger or to cause intentional harm
- Effectively monitor future interactions
- Move the alleged perpetrating child to a closely monitored classroom
- Report to the authorities if the inappropriate behaviors cause you to suspect a child in your care is being abused or being abusive

**Gift Boundaries**

- Establish a pre-approved reward and gift policy including:
  - What kinds of rewards and gifts can be given to individual or small groups of students (with specific dollar limits)?
    - Tangible
    - Intangible (outings – with or without staff, etc.)
    - Special privileges
    - Preferential treatment
    - Quid pro quo agreements
  - Who can rewards and gifts be given to?
  - When and how often can rewards and gifts be given?
  - Limit the number of times each student can receive a reward or gift from the same staff member?
  - No gifts to parents
    - Tangible gifts
    - Intangible gifts
    - Loan