

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

Child Sexual Abuse Prevention

Boundary Policy Considerations in Schools

- 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

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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 batting 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 off-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 take 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