

SafeConduct™ Youth Programs

Policy & Procedure Template

©Insurance Board, Second Edition

This template is provided as a service by Insurance Board, a non-profit insurance and risk management ministry, as a service to churches and camps of the denominations it serves: The Christian Church (Disciples of Christ), Presbyterian Church USA, Alliance of Baptists, and United Church of Christ. The materials provided are based, in part, on guidance provided by **Praesidium, Inc.**, our business partner and consultant in matters of abuse prevention.

It is the responsibility of church leaders to determine the necessary components of policy.

While this template is focused primarily on child abuse prevention, opportunities will be identified to address other issues that relate to **SafeConduct™**, to include sexual harassment, professional boundaries, sexual orientation, bullying and exploitation of vulnerable adults. Users will find that principles applying to abuse prevention can apply to and are easily adaptable to the other vulnerable groups although different specific techniques may apply.

Depending upon the nature of [CHURCH NAME], whether a church, camp, or other non-profit, you may customize terms to suit your culture. For example, you may wish to insert a variety of scriptural references. This particular policy statement is very broad and goes beyond child sexual abuse to include elements of employment practices and other at-risk groups. For example, a church may routinely provide an overflow homeless shelter where families and persons with mental illnesses are present.

While many churches use terms such as “safe church”, “safe sanctuary” or similar terms for their policies, we have adopted throughout the policy template the term **SafeConduct™**. Our strategy is to focus less on a fortress place and more on the importance of personal behavior and personal responsibility in abuse prevention. **While SafeConduct™ is a trademarked term, any church or non-profit camp within the denominations we serve is free to use it.** Some have already chosen to incorporate it. We are pleased that you do.

Congregational Approval – Creating a policy for the first time will not always be easy and may take more time than expected. Some will resist the vetting and oversight that is implicit in an effective program. It will be important that you engage your congregation in the process and arrive at consensus. When it comes time to vote on adoption, the details of the policy and procedure must not be a surprise. Be sure to understand what your Constitution or By-Laws may require to obtain approval.

Policy Language – Throughout this template, procedures are expressed as imperatives (shall, will). Vague terms such as “should” or “may” are specifically avoided. Responsibility for specific actions are assigned to “individuals” (usually by title), not to groups or committees. Each individual must understand his/her specific responsibility.

Copyright Notice: This document is intended for the exclusive use of religiously affiliated organizations which are eligible to be served by Insurance Board programs. Reproduction of this document for commercial purposes is prohibited.

SAMPLE

Indemnity Statement

Praesidium provides Sample Policies and Procedures to assist in the prevention of organizational abuse. However, it must be noted that no system can guarantee prevention of abuse. This information is not legal advice, either expressed or implied. Consultation with qualified legal counsel is recommended.

When all recommendations are implemented and maintained, a risk for abuse continues to exist, as the problem of abuse is pervasive and no system to date can assure complete safety.

Accordingly, **PRAESIDIUM MAKES NO WARRANTIES, EXPRESS OR IMPLIED, INCLUDING WARRANTIES OF FITNESS FOR A PARTICULAR PURPOSE AND MERCHANTABILITY, REGARDING THE SUCCESS OR FAILURE OF THE PRAESIDIUM SAMPLE POLICIES AND PROCEDURES IN PREVENTING OR REDUCING THE INCIDENCE OF ABUSE**

THESE POLICIES CONTAIN MODEL LANGUAGE BUT SHOULD BE REVIEWED BY LEGAL COUNSEL PRIOR TO USE TO ENSURE COMPLIANCE WITH LOCAL, STATE, AND FEDERAL LAW

Contents

Implementation of Monitoring and Supervision	5
Monitoring and Supervision Programs.....	5
Sample Facility Monitoring Guidance.....	5
Sample Guidelines for Adult-to-Youth Ratios	5
General Supervision Procedures.....	6
Sample Guidelines for Monitoring Youth on Church Property.....	7
Monitoring High Risk Activities	8
Bathroom Activities	8
Locker Room Activities.....	9
Shower Activities	9
Transition Times and Free Times	10
Playground Activities.....	10
Transportation Activities	10
Off-Site Activities.....	12
Overnight Activities	12
Overnights on Church Property.....	13
Overnights Away from the Facility	13
Teen Leadership Program	14
Supervisors and Administrators Monitoring On-Site and Off-Site Programs	15
Youth Education	16

Implementation of Monitoring and Supervision

This manual is to be used to facilitate the best possible supervision techniques for the unique programs of your church, camp, or non-profit. A key component of effective monitoring is that Clergy, employees, volunteers, participants, and parents/guardians can actively see monitoring in place. A potential offender must know their actions will be detected. Churches are often a place of safety and spirituality. We must balance that with an understanding that all adults must follow the policies or procedures related to monitoring. Utilize the policies and procedures below to consider what are the most effective strategies. Best practices and guidelines are meant to outline how to develop your own policy.

Monitoring and Supervision Programs

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

Sample Facility Monitoring Guidance

Building architecture can increase or mitigate the risk of an incident or accident. Because most incidents of sexual behavior occur in private, the extent to which privacy is managed, risk is managed. To ensure that all the locations are properly and consistently monitored, designate a staff member who must complete a site inspection checklist. A sample checklist is available in Appendix A.

Checklists should note areas that are off limits to youth. These areas, as well as areas where youth are present, should be monitored frequently on an interval schedule. Include in the checklist procedures frequency, who is responsible for checks, unusual incidents, and who is responsible for reviewing completed documentation.

Sample Guidelines for Adult-to-Youth Ratios

Specific adult-to-youth ratios help define the level of supervision necessary to be effective and safe. Ratios also enable employees, volunteers, and supervisors to easily identify when additional personnel are necessary. This organization will ensure all programs adhere to the following specific adult-to-consumer ratios:

[Ratios will be well established, known, and followed consistently by all employees and volunteers. Programs governed by external regulations will follow required ratios from their governing bodies or lower ratios as required by our organization. Criteria to consider when setting ratios are: external legal or regulatory agency standards, age, program type, location/facility, high risk activity, and age of employees/volunteers charged with supervising consumers. Minor employees should not supervise consumers without adult employee or volunteer supervision. Supervisors will consistently supervise programs to ensure ratios are followed and follow up with employees and volunteers if ratios are not followed. Ratios will vary depending on the age of consumers in the program and employees and volunteers will always follow the lowest possible ratio when working with mixed-age groups.]

[Insert organization ratios for different types of programs here:]

Note: While the ratios are listed as “1 adult” per X number of minors, at least two adults must always be present with minors. For example, two toddlers require two adults, even though the ratio is no more than four minors to 1 adult.

- | | |
|---|--------------------------------------|
| • Birth to 12 months | no more than three minors to 1 adult |
| • Toddlers (1 to approx. 3 years) | no more than four minors to 1 adult |
| • Preschool (approx. 3 to 5 years) | no more than seven minors to 1 adult |
| • Kindergarten through 3 rd grade | no more than 10 minors to 1 adult |
| • 4 th grade to 6 th grade* | no more than 12 minors to 1 adult |
| • Youth (12 and older) | no more than 20 minors to 1 adult |

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. **Administrative and Supervisory Visits to Adult-serving Programs-** Supervisors and administrators will regularly visit all vulnerable adult serving programs to ensure that all activities are well- managed and that policies are observed by all in attendance.
3. **Ratios-** Each program will follow the ratio requirements that are directly related to the goals of the program and the design of the program area. The employee or volunteer-to-youth ratio should be increased for programs that serve youths with special needs. Refer to local licensing requirements and general best practice guidelines for establishing adult-to-youth ratios.
4. **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. Clergy, employees, and volunteers must be aware that close line of sight supervision is required when monitoring programs that mix age groups.

Sample Guidelines for Monitoring Youth on Church Property

Because [CHURCH NAME] is responsible for all youths on church property, we recommend implementing the following practices:

1. Require a parent or legal guardian to complete an information and permission form which includes identifying information, any special medical or behavioral circumstances, any legal indemnifications, the youth's date of birth, who is authorized for pick-up. 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. Require youths to sign a Code of Conduct that outlines the program's behavioral expectations and policies regarding appropriate and inappropriate interactions. This Code of Conduct should also include a progressive disciplinary policy which states consequences can include dismissal from the program. Require parents to sign this Code of Conduct as well, so that they are aware of the program's policies and progressive disciplinary procedures.
 - While a parent orientation may not be feasible in all circumstances, we recommend encouraging parents to attend an information session with a program representative. This meeting will provide an opportunity to review expectations and requirements, and the chance to establish a relationship with the parents. This can be helpful if any problems arise in the future.
3. While in the facility, youths can be supervised directly, indirectly, or with a combination of the two techniques when age and developmentally appropriate.
 - **Direct Supervision:** The program may offer structured, scheduled activities like basketball tournaments, swimming activities, arts and crafts, etc. These activities should have one or more staff assigned to lead and supervise.
 - **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.
4. Develop supervision standards for the authorized areas.
 - Determine how frequently authorized areas should be monitored including random checks.

- Assign employee and volunteer-specific supervision responsibilities over authorized areas.
 - Require employees to record when they monitor authorized areas and document and report any unusual or concerning findings.
5. All program staff and volunteers should wear nametags or identifying clothing so that anyone can easily recognize them as such.
 6. Train all staff and volunteers to:
 - Greet consumers that enter the facility; direct them to the structured activities or authorized areas; and redirect consumers not in an authorized area or not participating in a structured activity.
 - Be aware that free and unstructured activities can include transitional times, such as waiting for transportation.
 - Be aware of the risks involved with mixing age groups and developmental levels and how to monitor activities and conversations involving mixed levels – including increasing supervision when necessary.
 - Routinely monitor high risk areas (such as bathrooms, locker rooms, and unused rooms). Designate specific employees to supervise these areas (i.e., Managers on Duty) and document the scheduled and random sweeps of high-risk locations.

Ultimately, all youth 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.

Monitoring High Risk Activities

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. Any youth or vulnerable adult that requires personal care assistance should have this notation in their file.

1. 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.
2. For single use restrooms:
 - Require youths to ask permission to use the bathroom.
 - Require all staff to frequently check bathrooms.
 3. Prohibit staff from using the bathroom at the same time as youths.
 4. If assisting young children in the stalls, the staff should keep the door to the stall open.

Locker Room Activities

The locker room procedures include:

- Requiring staff to stand within earshot of the locker room when in use by young people.
- Requiring staff to intermittently and briefly check inside the locker room so users know the locker room is monitored.
- Discouraging the use of locker rooms by youths of different ages at the same time.
- Prohibiting the use of locker room horseplay such as towel snapping.
- When possible, arrange lockers to minimize unnecessary privacy.
- Prohibit cell phones or electronic devices from being in the locker room.

Shower Activities

Staff and youth must shower at different times. Create shower schedules that will permit supervision of the youths while staff shower.

- While the youths shower, at least one staff member should stand in the bathroom doorway and within earshot of the youths.
- Use the “rule of three”. At least two youth and supervising should go together. For example, one youth cannot go shower with one staff supervising.
- Ensure that only one youth is in each shower stall.
- Consider utilizing shower curtains that do not go all the way to the floor, so that staff can easily see how many youths are in each shower stall.
- Minimize youth of different ages showering at the same time. For example, split groups into ages 7–9, 10–12, 13-15, 16+

Transition Times and Free Times

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

- Require youths to always remain in line-of-site of staff and volunteers
- Specify the staff or volunteer-to-youth ratio. Minor volunteers may not count.
- Specify authorized areas within the program area where youth are allowed to go.
- Ensure that all staff are assigned specific areas to supervise (“zone monitoring”).
- Follow established bathroom procedures.
- Require periodic roll calls for each age group.
- Require supervisors to conduct periodic check-ins and sweeps of the entire activity area.
- Allow the use of a cell phone or two-way radio as an alternative form of communication to be used during an emergency.

Playground Activities

The playground procedures require:

- Established ratio of adult-to-youth on playgrounds and how to maintain ratios during bathroom breaks.
- Youths to remain in line-of-site of staff at all times.
- Definition of specific and narrow geographic boundaries around the playground area.
- Specific instructions on how to monitor barriers of supervision (such as storage sheds, playhouses, tunnels, and shrubs).
- That all staff are assigned specific areas to supervise (“zone monitoring”).
- Staff to conduct periodic roll calls for each age group.
- Supervisors to conduct periodic check-ins and assessments of the activity period and of the entire activity area.

Transportation Activities

Transporting youths may increase the risk of abuse or false allegations of abuse because Clergy, employees, and volunteers may be alone with a youth or may make unauthorized stops with youths. In addition, transportation activities may

provide time for unsupervised youths to engage in youth- to-youth sexual activity.

Church Provided Transportation Guidelines:

- Require written parent/guardian permission for all youths on the trip. Staff take these permission forms and medical releases with them on the trip.
- Require staff to have a list of the youths on the trip. The staff take roll when boarding the bus, when leaving the bus, periodically throughout the trip, and then again when boarding the bus.
- Specify staff-to-youth ratios. When possible, do not count the driver in the supervision ratio.
- Require staff to sit in seats that permit maximum supervision. When possible, adults should not share seats with youth.
- Discourage mixed age groups from sitting together. When possible, high-risk youths are seated by themselves or close to an adult.
- Prohibit drivers from making unauthorized stops.
- Require documentation of any unusual occurrences.

Public Transportation:

- In addition to the transportation procedures listed above, youths should remain in one area of the bus, if possible.
- Clergy, employees, and volunteers that are assigned to a group should remain with that group on the bus.
- Take a head count or call roll immediately after entering and leaving the bus.

Private Vehicle Transportation:

- Employees must not transport only one consumer at a time without another employee or volunteer present, except in the case of an emergency.
 - Consumers should sit in the backseat if an employee or volunteer must transport a single consumer.
 - Designate who should be notified when just one consumer is transported by one employee; examples could be parent/caregiver, supervisor on duty.
- Be mindful of the music or audio playing in the car is appropriate.
- Employees must notify supervisors of all transportation activities.
- Employees must follow established organization policies on physical interactions with consumers while in vehicles.
- When possible, employees should avoid engaging in sensitive conversations with consumers.

Off-Site Activities

The off-site procedures include:

- Requiring supervisor approval for all off-site activities.
- Requiring parental approval.
- Specifying staff-to-youth ratios for the activity.
- Requiring staff, volunteers, and youths to be easily identifiable.
- Including specific bathroom and locker room procedures as applicable to outing.
- Including transportation procedures.
- Including instructions for a supervisor to observe the off-site activities at scheduled times and random intervals.
- Considering specific recommendations based on the location and type of activity (for example, Amusement parks, Water Parks, Arcades, etc.).

Please see Appendix A for a sample Field Trip Preparation Checklist.

Overnight Activities

Overnight activities and residential settings can present unique risks to consumers and employees and volunteers. Overnight and residential settings often involve changing clothes; consumers of different ages interacting in a more intimate atmosphere than regular program activities; more unstructured and novel activities; and increased opportunities for a consumer to avoid supervision and for employees and volunteers to be distracted.

Supervision Guidelines:

- All overnight activities must be documented and approved in writing by the (CHURCH DESIGNATED LEADER).
- Administrators are expected to regularly and randomly observe overnight activities on a scheduled and periodic basis.
- The (CHURCH DESIGNATED LEADER) should appoint a “lead” staff to supervise the overnight. A meeting with all staff and volunteers is conducted to discuss the unique risks of overnight trips, unique elements of the specific overnight trip and to review the specific policies and procedures.
- Provide parents with written information about the overnight activity. All parents must sign a permission slip for their youths to attend the overnight, including a Code of Conduct for youth.
- Determine the appropriate staff-to-youth ratios before the event and schedule staff accordingly.
- Meetings with the group should be hosted in open and observable areas; meetings should not be hosted in staff or youth rooms.

- Youth should be split into smaller age groups, when possible, to eliminate large age differences among youth. For example, 7–9, 10–12, 13-15, 16+

Overnights on Church Property

- Authorized areas within the facility must be clearly defined and explained to the consumers.
- Assign each staff to a specific group of youths to supervise. Each staff should then maintain a role sheet that lists all the youths in his or her group. Head counts and roll checks should be conducted routinely throughout the evening.
- Assign staff to high risk areas in [CHURCH NAME]’s facility, such as the bathrooms, entrances and exits, hallways, etc. If it is not possible to assign specific staff to these areas, assign specific staff to conduct periodic facility “walk-throughs”.
- With regards to sleeping arrangements, separate the male and female youths by smaller age groups into separate rooms and post staff and volunteers at the entrances and exits to these rooms. If this is not feasible, separate males and females by as much space as possible.
- When performing room checks, staff or volunteers should always go in pairs.
- For overnight activities when sleeping is not part of the activity (i.e. a lock-in), require at least three employees to stay awake overnight. Refer to Adult-to-Minor Ratios policy for additional guidance.

Overnights Away from the Facility

- Overnight stays at private homes, including private rental properties, are prohibited unless approved by (CHURCH DESIGNATED LEADER).
- Physical boundaries at the off-site location must be clearly defined and explained to the youths.
- Assign each staff to a specific group of youths to supervise. Each staff should then maintain a role sheet that lists all the youths in his or her group. Head counts and roll checks should be conducted routinely throughout the event.
- If in a cabin type setting, the staff should be placed in bunks to maximize supervision around the cabin and in a way that decreases the chances of youths sneaking out (such as by the door).
- In hotel rooms, assign youths to rooms based on gender and age. Staff should have their own rooms. If staff must share rooms with youths, they must have their own beds and never change in front of youths.
- All staff are to be on duty in the halls or cabins at night until an hour after lights out and all rooms are quiet.
- Include structured guidelines for conducting overnight room checks.

Teen Leadership Program

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. Boundaries with teen leaders must be maintained to the same level as any other youth at (CHURCH NAME). In addition, Clergy, employees, 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:

1. Create a screening process for teen leaders which includes
 - Age requirement: Consider requiring at least a four-year age gap between teen leaders and youth they are working with.
 - A standard application
 - An interview with behaviorally based interview questions
 - References (from teachers, counselors, family friends, etc.)
2. Create specific policies for teen leadership program including:
 - 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 Clergy, employees, 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.
 - Prohibit teen leaders from dating or engaging in any kind of romantic relationship with consumers.
 - Require teen leaders to wear clothing or lanyards that identify them as leaders-in-training and differentiate them both from employees and younger campers.
3. Train teen leaders in their role in programs and on program policies about appropriate and inappropriate interactions. This training should include the following information:
 - Their role as a leader, including what they are and are not allowed to do.
 - The dynamic of being responsible for and supervising younger youth.
 - General abuse risk management, appropriate boundaries, self-protection, and preventing false allegations.
 - Preventing consumer-to-consumer sexual activity.

- How to report concerns about themselves, other employees, or the consumers in the program.
 - Train employees and supervisors in how to monitor teen leaders.
 - Address the dynamic of adults working with minor employees.
4. Monitor Teen Leaders.
- Designate a specific employee or volunteer who is in charge of 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 Clergy, employees, 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.

Supervisors and Administrators Monitoring On-Site and Off-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 employees and volunteers.** 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 actually 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 with youth or vulnerable adults.**

Youth Education

Educating youth in (CHURCH NAME) programs is an important step in abuse prevention. We will share education points and policies with parents/guardians throughout programming that will:

- Youth and vulnerable adults receive age- and cognitive level-appropriate information about boundaries.
- Ensure all youth and vulnerable adults know how to report any concerns.
- Ensure all youth and vulnerable adults know which staff they can talk to about safety concerns or reports of abuse.
- Ensure all youth and vulnerable adults are aware of one-on-one interactions policy and understand appropriate and inappropriate forms of physical and verbal interactions from employees and volunteers.