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Child Sexual Abuse Prevention

CREATING A POLICY FOR
YOUR ORGANIZATION



**Positive
Childhood
Alliance**
NORTH CAROLINA

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About this TOOLKIT



Based on the information included in the Centers for Disease Control and Prevention's (CDC) Guide Preventing Child Sexual Abuse Within Youth-Serving Organizations, this toolkit is designed to help you make your organization a safe space for children and families. It can serve as a guide to help you create a basic Child Sexual Abuse (CSA) Prevention Policy. Each of the components will outline key areas to include in your policy.

This resource was developed by Positive Childhood Alliance North Carolina and may be co-branded with permission. For inquiries, contact Kelly Baxter at kbaxter@positivechildhoodalliancenc.org.

1 COMPONENT 1

Screen, Select, Inform

The goal of this Component is to not only select the best people for your organization but also to screen out those that may pose a risk to youth. Using these tools will help foster your safety culture. Abusers often seek employment and volunteer opportunities that will give them access to children. Implementing a strong application and interview process can help screen out these potential offenders. This component also helps ensure safety during interactions between adults and children and between children. This is done by establishing a code of conduct that must be signed by all staff and volunteers.

In this component, you will:

- Build an application and interview process for all staff and volunteers
- Learn how to conduct criminal background checks and references for all staff and volunteers.
- Create job descriptions and a code of conduct for all staff and volunteers

1

Sample Application and Interview Questions

All applicants — both adults and youth — in all positions — both paid and volunteer — should complete a written application. If their application moves forward in the consideration process, there should be a personal interview.

The written application provides the information you need to assess the background and interests of applicants. Questions should help you determine if applicants have mature/adult relationships, clear boundaries and ethical standards for their conduct with youth. Potential questions to include in your application could include:

- Ask about previous work and volunteer experiences.
- Ask questions pertinent to child sexual abuse screening.
- Provide a permission form for contacting personal references and performing a criminal background check. The permission statement should be reviewed by an attorney if possible.
- Ask open-ended questions that encourage broad answers. These will provide material for follow-up in the personal interview and throughout the screening and selection process.
- Use disclosure statements to ask applicants about previous criminal histories of sexual offenses, violence against youth and other criminal offenses. The applicant may not disclose past offenses, but the inquiry will demonstrate your organization's seriousness about protecting youth and potentially discourage applicants at risk for perpetrating child sexual abuse.

Personal Interview

The personal interview provides an opportunity to meet applicants, determine if they are a good fit for your organization and ask additional questions to screen for child sexual abuse risk factors. In your interview you can:

- Clarify and expand upon the applicant's answers to questions from the written application.
- Ask open-ended questions that encourage discussion.
- Discuss your organization's expectations around safeguarding children.

Learn more about what the [CDC recommends](#) to ask potential candidates on an application and in an interview.

1 Organizational Procedures Regarding the Application, Interview, Reference Check Policy

The following procedures can be tailored to your organization's Child Safeguarding Policy.

INTERVIEWING

- a. Interviews include questions for assessing risk and key skills for ensuring the safety of children (see questions included below).
- b. Interview responses are evaluated for high-risk indicators using the checklist (below) prior to proceeding to the next phase. Any high-risk indicators identified are discussed amongst the hiring team.
- c. An outside background check will be performed for finalists through a private provider of record check service or a state law enforcement agency. If the screening process reveals any information that causes concern that the applicant poses a threat of abuse to children, youth or others in the organization, or has a history of abuse directed against another person, the hiring authority will remove the applicant from consideration for employment.

REFERENCE CHECKS

- a. A minimum of 3 reference checks, including at least one professional and one personal, are conducted on any potential hire. Reference checks are an important source of information to identify any potential high-risk indicators through a source other than the applicant themselves.
- b. A standardized set of questions is used that can screen for applicants' abuse risk. Responses are evaluated for high-risk indicators using the checklist (sample included below).

Professional References:

- 1. We are looking for someone who will adhere to the standard policies of our organization. How would you rate the applicant's ability to follow policies and procedures?
- 2. How would you rate the applicant's ability to use good judgement in stressful conditions?

Organizational Procedures Regarding the Application, Interview, Reference Check Policy *(con't)*

Personal References:

1. How long have you known the applicant and what is your relationship?
2. How would you describe the applicant's ability to maintain appropriate boundaries?
3. Are you aware of any reason why we shouldn't consider them?

Reference checks may be performed by an individual other than the hiring manager to minimize the potential for introduction of bias in this process. Reference checks are evaluated for high-risk indicators using the checklist prior to proceeding to the next phase. Notes and information gathered during reference checks are shared with all members of the hiring team and any high-risk indicators identified are discussed amongst the hiring team.

*HIGH-RISK INDICATOR CHECKLISTS RISK LEVEL EVALUATION

Use the following checklists to evaluate applicant levels of risk to abuse children and vulnerable adults. Consider information gathered throughout the screening process.

High-Risk Checklist for APPLICATION

- ☐ Application includes conflicting or incorrect information.
- ☐ Application has omitted or incomplete information.
- ☐ The applicant has an unstable work history.
- ☐ The applicant provides vague reasons for leaving previous jobs.
- ☐ The applicant is unwilling to use former supervisors as references.
- ☐ The applicant is overeducated or overqualified for this position or other positions with children.
- ☐ The application shows a pattern of work and volunteer positions with the same type of children.
- ☐ The work pattern shows themes of problems with authority.
- ☐ The applicant describes children as helpless, vulnerable or perfect.

High-Risk Checklist for INTERVIEW

- ☐ Applicant gave higher risk responses from the interpretive guide.
- ☐ Applicant gave defensive/angry responses.
- ☐ Applicant gave evasive responses.
- ☐ Applicant described patterns or themes of gaining access to children.
- ☐ Applicant described preferences for particular children with no reasonable explanation.
- ☐ Applicant described patterns or themes of problems with authority.
- ☐ Applicant is not applying for a specific position and is willing to accept positions which vary significantly in pay and/or responsibilities.
- ☐ Applicant gave responses indicating a perception that children are "helpless" or "vulnerable."

Organizational Procedures Regarding the Application, Interview, Reference Check Policy *(con't)*

High-Risk Indicators for REFERENCES

- ☐ References were reluctant.
- ☐ References did not know the applicant well.
- ☐ References have short term relationships with the applicant.
- ☐ References refused to answer particular questions.
- ☐ Reference information differed from the applicant's account.
- ☐ References described applicant as having high-risk characteristics.
- ☐ References provided evasive responses.
- ☐ References reported specific concerns about the applicant.

1

Best Practices for Background Checks and References

CRIMINAL BACKGROUND CHECKS

Criminal background checks are an important tool in screening and selection. However, they have limitations. Criminal background checks will not identify most sexual offenders because most have not been caught. Using background checks alone may give your organization a false sense of security.

TIPS:

- You can save time and money by making the criminal background check the last step in your vetting process.
- You can use free tools as a supplement, such as the NC Sex Offender Registry (<https://sexoffender.ncsbi.gov/>).
- Obtain permission from the applicant before beginning a background check.
- Determine the type of check needed (fingerprint, state/national, etc.) and plan for time and financial resources needed.

[The NC Department of Public Safety has information how to obtain a background check.](#)

CRIMINAL BACKGROUND CHECKS

Reference checks provide additional information about applicants and help verify previous work and volunteer history. This gives you the opportunity to ask questions to give you a more complete picture of the potential employee/volunteer.

- Obtain verbal — not just written — references for applicants. Conversations can elicit much more information than written responses.
- Ask for both personal and professional references. For youth volunteers, professional reference could include a teacher, coach or mentor. Personal references can offer insight into additional aspects of an applicant's life, like volunteer history, etc.
- Be aware that many employers will only provide basic information, such as dates of employment or rehiring eligibility. This may be company policy and not a red flag for any concerning behavior.

Best Practices for Background Checks and References *(con't)*

USEFUL REFERENCE CHECK QUESTIONS:

- How would you describe the personal characteristics of the applicant?
- How does the applicant interact with youth?
- Why would this person be a good candidate for working with youth? Is there any reason this person should not work with youth?
- Have you seen the applicant discipline youth (other than his or her own children)?
- Would you hire this person again? Would you want him or her in your organization in the future?

1

Code of Conduct Overview

What is a Code of Conduct?

The Code of Conduct is a document that clearly outlines the expectations on how staff, volunteers and older youth will interact with children. There should be a balance in a code of conduct allowing for nurturing, encouraging, appropriate interactions and clearly outlining inappropriate or harmful actions. A good code of conduct should include the following:

- A written policy to limit one-on-one interactions between program participants with both staff and volunteers.
- The organization restricts and/or prohibits certain activities outside of the organization's programs, including overnight trips, social media "friending" and other unobservable interactions between program participants and staff & volunteers.
- Identification of behaviors that fall into the categories of appropriate and inappropriate and harmful, and these behaviors are communicated to staff, volunteers, program participants and their families.
- Areas of special concern in your organization — diapering, changing clothes, children with special needs, transportation, etc.

1

Basic Code of Conduct

TEMPLATE

This is a sample of a Code of Conduct. You can use this as a template, but it should be tailored to fit your organization and the way that staff interact with children and youth. It is important that your organization discusses this policy at the time of hire and annually with all staff so that all staff members and volunteers understand and sign your code of conduct.

We take the safety of children seriously. Children must be safe to grow, thrive and reach their potential in a nurturing environment. Mistreatment or neglect will not be tolerated.

As a staff member or volunteer at [ORGANIZATION NAME], I commit to the following:

1. To protect staff, volunteers and program participants, at no time during an organizational program may a staff member or volunteer be alone with a single youth where they cannot be observed by others if possible. As staff supervise youth, they should space themselves in a way that ensures they are clearly visible to other staff.
2. Staff and volunteers will not abuse youth. No type of abuse will be tolerated and may cause for immediate dismissal, the filing of criminal charges or other disciplinary action. The following actions and behaviors are prohibited:
 - a. Sexual abuse, molestation and all inappropriate touch. This includes sexual exploitation — for example sharing or taking nude pictures or being nude in front of youth under your care or direction.
 - b. Physical abuse, punishment or discipline — for example the use of physical force or striking — whether used for behavior management or not.
 - c. Physically inappropriate interactions such as touching breast or genital area, wrestling, massages, caressing, sitting on lap, patting on bottom, piggyback rides or kissing.
 - d. Bullying, taunting or intimidation of physical force.
 - e. Telling or asking a child to not tell an adult or parent of words or actions of staff or volunteers.
3. Profanity, inappropriate jokes, sharing intimate details of one's personal life and any kind of harassment in the presence of youth is prohibited.
4. Staff and volunteers may not show favoritism by singling out one child for attention, gift-giving or other privileges.
5. Staff and volunteers may not be alone with youth they meet in the organization's programs outside of the organization. This includes babysitting, sleepovers and inviting youth to your home or visiting their home. This also includes private interactions through social media, computer or hand-held devices. Any exceptions require a written explanation before the fact and are subject to administrator approval. All pre-existing relationships with participants must be disclosed in writing.
6. Staff and volunteers are not to transport youth in their own vehicles except in cases of emergency or with express written approval from [ORGANIZATION NAME].
7. Staff and volunteers may not date, have romantic or sexual relationships with program participants, regardless of their age.
8. Under no circumstance should staff or volunteers release youth to anyone other than the authorized parent, guardian or other adult authorized by the parent or guardian. When in doubt staff will ask to see ID when picking up youth.

Staff and volunteers are required to read and sign all policies related to identifying, documenting and reporting youth abuse and attend training on the subject, as instructed by a supervisor.

COMPONENT 2

Train, Monitor, Support

The goal of this component is to provide information and skills to help prevent and respond to child sexual abuse. It provides education on how to recognize and respond to inappropriate behaviors and to reinforce appropriate behaviors to keep children from situations where they are at increased risk of sexual abuse.

In this component, you will:

- Learn about CSA prevention training options for all staff and volunteers
- Learn how to establish safe environment guidelines
- Create an ongoing monitoring system for staff and environments, including annual training and review of policies and procedures

2

Child Sexual Abuse Prevention Training Options

There are a variety of training options that you may choose for your staff. You may choose in-person training or a virtual or module option. The best training option is the one that your organization will be able to easily implement and integrate into your system.

- Many Children's Advocacy Centers (CAC) in North Carolina have prevention education. You may find the information for your local CAC at www.cacnc.org.
- Darkness to Light has evidence informed training, Stewards of Children, that may be taken online or with a trained facilitator. You can view those options and look for a facilitator near you at www.d2l.org
- The Redwoods Group offers online training at <https://redwoodsgroup.com/resources/child-sexual-abuse-prevention-training/>

2

Establishing Safe Physical Environments

Environmental strategies will vary depending on the organization. The physical space may not be able to be adjusted but an audit of the space can help an organization brainstorm ways to make it safer. Four key things to consider are visibility, access control, privacy and transportation.

Visibility

Spaces that are open and visible to multiple people can create an environment where individuals at risk for sexually abusive behaviors do not feel comfortable abusing. Activities should be observable and interruptible. The following can increase visibility:

- Institute a “no closed door” policy.
- Try to have clear lines of sight throughout the building.
- Secure areas not used for program purposes to prevent isolation (e.g., lock closets, unused classrooms and storerooms).
- Install bright lighting in all areas.

EXAMPLE PROCEDURES:

1. All activities with children should take place in open spaces. There are to be no closed doors. If privacy is needed, then the activity must be observable through a window.
2. All areas not used must always remain locked. This includes all closets, storage rooms and unused classrooms.
3. Supervising staff will do a daily monitoring walk of the premises to ensure that no unlocked or unsupervised areas are present.

Access Control

Your organization should always monitor who is present.

- Develop policies and procedures for admitting and releasing children so their whereabouts are always known.
- Have policies and procedures for monitoring which people outside of your organization are allowed in and under what circumstances.

Establishing Safe Physical Environments (con't)

EXAMPLE PROCEDURES:

1. Children will be signed in and out of the program each day. Children will only be released to adults on the approved pick-up list.
2. Guests in the facility will be escorted by staff or volunteers. They will not be alone with children. If privacy is needed, (therapy, etc.) it will be conducted in a space that is visible, either open or windowed.

Privacy when toileting, showering, changing clothes

Your organization should develop policies and procedures for reducing risk during activities such as toileting, showering and changing clothes that consider not just the risk of employee/volunteer sexual abuse, but also the risk of inappropriate or harmful contact among youth.

EXAMPLE PROCEDURE:

1. Restroom supervision: Staff will ensure:
 - Children are with an adult staff member and will have either 1 staff and 2 children or 2 staff and 1 child.
 - Staff will have 'line of sight' or 'line of sound' supervision.
 - If staff are assisting younger children, doors must remain open.

Transportation policies

Your organization should define who is responsible for transporting youth to and from regular activities and special events (e.g., field trips, overnight trips). Decide how to answer the following questions:

- Can a youth ride in a car with an employee/volunteer? If yes, under what circumstances? For example, can a youth be alone with an employee/volunteer in a car?
- What are pick-up procedures at the end of the day or the event?

EXAMPLE PROCEDURES:

1. Staff and volunteers are not to transport youth in their own vehicles except in cases of emergency or with express written approval from the ORGANIZATION. If a child must be alone in a vehicle with an adult they should sit in the back seat and if possible be on a phone call with a parent or supervisor of the organization.
2. If there is one child remaining to be picked up at the end of the day, the adult should move to an open space with that child so they might be observed, if possible. This could be outside, in another room with adults, etc.

2

Monitoring Behavior and Spaces

The goal is for everyone to have a stake in preventing, recognizing and responding to inappropriate and/or harmful behaviors while reinforcing appropriate behaviors. Monitoring involves observing interactions and reacting quickly and appropriately.

The organization has written procedures in place to monitor interactions between program participants and staff and volunteers.

Procedures should define inappropriate behaviors, potential risky situations and potential boundary violations. Possible infractions could include, 1-1 isolated contact, giving gifts, physical horseplay.

The organization empowers all employees and volunteers to monitor behaviors and interactions and maintains a written record of any reports of inappropriate behavior.

All employees/volunteers need to feel comfortable redirecting inappropriate behaviors, promoting positive behaviors, and reporting potential risk situations and potential boundary violations.

The organization makes clear the required reporting of inappropriate or harmful behaviors, all are made aware of a well-defined reporting structure, and this is communicated to all staff and volunteers.

- Require employees/volunteers to report any behaviors and practices that may be harmful.
- Establish direct-line and back-up reporting systems within your organization. The back-up option should be used if the incident involves the direct-line authority.
- Create a climate that encourages people to question confusing or uncertain behaviors and practices.

2

How Are We Keeping Your Child Safe?

Our organization is committed to keeping your child safe. We have established a child safeguarding policy to which we strictly adhere. Below are some key elements.

WE LIMIT ISOLATED ONE-ON-ONE SITUATIONS

One-on-one time is important to a child's emotional growth and development, but it does not have to happen behind closed doors. One-on-one interactions should take place in an open, observable and interruptible setting.

OUR EMPLOYEES AND VOLUNTEERS ARE CAREFULLY SCREENED

You can't screen out 100% of potential offenders, but best practices can help. Employee screening best practices include an in-depth application, personal and professional references, criminal background check and a personal interview. We have chosen to use these practices with all staff and volunteers.

OUR VOLUNTEERS AND STAFF SIGN A CODE OF CONDUCT AND RECEIVE TRAINING ON CHILD SEXUAL ABUSE PREVENTION.

We provide child sexual abuse prevention training to all our staff and volunteers. They are educated on how to recognize, respond to and report an incident or allegation. We put a Code of Conduct in place that minimizes opportunity for abuse, outlines appropriate behavior and encourages monitoring and reporting of potentially unsafe situations. Policies and Procedures are reviewed annually, and all staff and volunteers must sign the Code of Conduct each year.

WE HAVE CLEAR PROCEDURES FOR REPORTING SUSPICIONS OR INCIDENTS OF ABUSE.

If anyone in our organization receives a disclosure of abuse or has a suspicion of abuse, we are required by law to report that to local law enforcement and the Department of Social Services. We take that obligation seriously. We have an outlined procedure, and everyone is aware of the process and how to contact the proper authorities.

As a parent, you may drop in anytime, ask any questions, see our policies and Code of Conduct and share your thoughts with us. We want to partner with you to ensure safety for all children, not only in our facility but in our community.

3 COMPONENT 3

Respond & Report

The goal of this component is to respond quickly and appropriately to inappropriate or harmful behavior, policy violations, evidence or allegations of child sexual abuse.

In this component, you will:

- Learn how to handle policy infractions
- Learn how to handle a disclosure
- Learn how to outline your reporting requirements and procedures

Note that it is important to maintain a record of incidents and develop a system to track and review any allegations or suspicions of child sexual abuse in your organization.

3

Handling A Policy Infraction

Policy infractions are not always malicious but that does not mean that they can be ignored. The organization should empower everyone to monitor behaviors and interactions. A written record of any reports of inappropriate behavior should be kept. There should be a well-defined reporting structure communicated to all staff and volunteers.

Having these procedures allows both the one committing the infraction and the person observing the infraction to be confident in the next steps. If you see a policy infraction or boundary violation it is important to step in immediately. Here are a few key steps:

- Identify the issue
- Remind of the policy
- Move on and follow your procedure

As an example, a staff person is holding a child on their lap. You tell them that lap sitting is against the policy, ask the child to move to the floor beside the staff member and move on. After the interaction you follow the next step in your procedure, letting the appropriate person know of the break in policy. It is often hard for a staff member to report on a co-worker. The reporting procedure must be clear and consistently enforced.

3

Handling a Disclosure

You may face a situation where a child in your care discloses abuse to you. This can be an upsetting situation for the child and you, the trusted adult. Your next steps are critical. Here are a few key things to remember:

- Offer support
- Say "I believe you," "This is not your fault"
- Don't Overreact-this can be difficult, but it may cause the child to shut down.
- Listen to the child and do not ask leading questions.
- Thank them for telling you.
- Let them know that it is your job as an adult to protect them.
- Don't make promises. You can't keep it a secret, you can't control whether they will have to see the person again, you can't control the outcome.

Remember, it is not your job to investigate or get all the answers. It is your job to listen to the child, allow them to lead the conversation and make a report to the proper authorities.

3

Reporting Requirements And Procedures

An organization should have clear written guidelines on when to report allegations and/or suspicions to authorities and these guidelines are communicated to staff and volunteers. The policy should include the person(s) in the organization who should be notified in addition to the authorities. It can also state that the person reporting does not need to fear retaliation or retribution as result of the report. There should be a listing of phone numbers/agencies where suspicions of child sexual abuse should be made that is readily available to both staff and volunteers.

Who Must Report

In NC all adults are mandated reporters of abuse. That includes both disclosures and reasonable suspicion of abuse. You are required by law to report to the Department of Social Services in your county and local law enforcement.

IT IS NOT YOUR JOB TO INVESTIGATE AND PROVE THAT ABUSE HAS OCCURRED.

It is only your duty to report what you know.

How To Report

- Locate your local Department of Social Services <https://www.ncdhhs.gov/localDSS>
- Locate your local law enforcement office: <https://cjin.nc.gov/law-enforcement-agencies/>

Some things to remember:

- It can be difficult to report. People are often worried about being wrong.
- You are required to make the report. You can't delegate it to someone else, but you can have a supervisor, co-worker, etc. sit with you while you make the call.
- You may remain anonymous. If you give your contact information, you will receive a report about the outcome from Social Services.
- Making a report can make a huge difference in the life of a child who is being hurt.

Other Resources

Download the following files as needed to assist in building your organization's CSA Prevention Policy.

- [Policy Planning Checklist Tool](#)
- [Child Sexual Abuse Prevention Policy Template](#)
- [Basic Job Application Template](#)
- [Code of Conduct Template](#)

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