Model D.C. Public Charter School Student Protection Policy

Developed By:



Guide to Using This Resource

Please note that throughout the document, there is gray italicized text denoting language that should serve as guidance from DC PCSB and Praesidium to school leaders creating individual LEA policies. Once addressed, the gray italicized text should be removed before the LEA finalizes and publishes their own policy. In addition, the bracketed "[D.C. Public Charter School]" throughout the document should be replaced with the specific LEA name if the LEA is using the exact language from this policy.

As the avenues to serving students on and off campuses increase, schools must take proactive steps to protect the students enrolled in D.C. public charter schools ("schools"). While providing consultation to numerous educational institutions, Praesidium has encountered varying approaches for addressing and managing the risk inherent with serving students. This resource is designed to help schools and those who seek to operate a program that serves students and youth in an educational setting manage the inherent risk in youth programming and implement best practices in abuse prevention.

Prior to operating programming involving students in an educational setting, D.C. public charter schools should be aware that there are many different aspects to managing this risk and preventing abuse. Approaches to these different aspects will vary by campus. Decision makers should review any existing policies governing youth protection. If none currently exist, this resource may serve as a template to address the safety of program participants.

In an educational setting, policies likely need to exist in at least two levels: LEA-wide and campus or site specific. LEA-wide policies strive for balance on the level of detail but err on the side of broad inclusion. They are designed to address global issues that apply to anyone who works with or around students. LEA-wide policies should establish minimum standards for screening, training, and reporting, and they include a zero-tolerance statement. Campus-specific policies help maintain consistency across similar programs by addressing varying risks that may exist in different types of programs. Note that a school system does not need five thousand sets of policies to address five thousand individual programs. Rather, it may group programs together (day camps, student teachers, community outreach, overnight events, international programs, etc.) and implement consistent, program-specific guidelines that address more detailed issues such as interactions, boundaries (whether and to what extent one-on-one interactions are allowed, electronic communications, etc.), and high-risk activities (bathrooms, locker rooms, overnight stays, etc.).

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Model D.C. Public Charter School Student Protection Policy

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POLICIES & PROCEDURES

Introduction

Consider integrating the institution's mission and values here.

The [D.C. Public Charter School] is committed to the well-being, safety, and protection of all members of the [D.C. Public Charter School] community, including students. The [D.C. Public Charter School] community recognizes students are a vulnerable population, and they require special attention and protection. This policy establishes the [D.C. Public Charter School]'s minimum standards and expectations for the protection of students in all member LEA's. This policy also defines: the screening, training, appropriate levels of supervision, and reporting requirements for the adults involved; and the oversight and compliance of all policies and procedures relating to students at the [D.C. Public Charter School].

Compliance with this policy does not eliminate or absolve performance of additional requirements that Programs must meet as outlined in other federal, state, local law or [D.C. Public Charter School] policy.

Scope

This policy applies to the entire LEA, and its employees, affiliates, volunteers, contractors, and visitors who are in Positions of Trust and Programs for Minors (as these terms are defined in Part I. General Definitions). This policy also applies to Programs sponsored in whole or in part by third parties and/or facility rental agreements occurring on campus or in school facilities.



I. General Definitions

For the purposes of this policy, the following terms are defined as follows:

A. Abuse (Citation Ann. Code § 16-2301)

Child abuse exists when there is endangerment of a student's physical or mental health due to injury by act or omission, including acts of sexual abuse. Child abuse and neglect includes the following:

- (a) <u>Neglect</u> includes negligent treatment or maltreatment and means a failure to provide adequate food, clothing, shelter, or medical care that includes medical neglect, and the deprivation is not due to the lack of financial means of his or her parent, guardian, or other custodian.
- **(b)** <u>Physical Abuse</u> includes physical injury inflicted on a child by other than accidental means. Physical injury includes
 - o Infliction of physical or mental injury;
 - Sexual abuse or exploitation;
 - o Negligent treatment or maltreatment

See 'neglect' for definitions of negligent treatment or maltreatment.

- (c) <u>Sexual Abuse</u> includes:
 - Engaging in, or attempting to engage in, a sexual act or sexual contact with a child
 - Causing or attempting to cause a child to engage in sexually explicit conduct
 - Exposing the child to sexually explicit conduct
- (d) <u>Emotional Damage</u> includes harm to a child's psychological or intellectual functioning that may be exhibited by severe anxiety, depression, withdrawal, outwardly aggressive behavior, or a combination of those behaviors, and that may be demonstrated by a change in behavior, emotional response, or cognition.

The [D.C. Public Charter School] has zero tolerance for abuse. For more detailed information regarding the District of Columbia's statutory definitions of child abuse and child neglect, see *Appendix A*. Please refer to all applicable codes and statutes for the current terms for definitions addressing abuse, neglect, exploitation, and abandonment, along with the associated mandated reporting requirements as found in *Appendix A*.



B. Authorized Adult

In this section, the institution may want to further address whether and to what extent this definition includes guest speakers, presenters, and/or Third Parties.

For the purposes of this policy, "Authorized Adult" means individuals, paid or unpaid, who instruct, interact with, supervise, chaperone, mentor, or otherwise oversee or interact with students in educational settings, in program activities, or in recreational or residential facilities and spaces. This includes but is not limited to faculty, staff, volunteers, interns, contractors, alumni, and other third-parties.

C. Minor

"Minor" is any individual under the age of 18 who is a student or participant in a program as that term is defined in this policy.

D. Students

"Students" are any individuals enrolled in school or as participants in programs at the [D.C. Public Charter School], regardless of age.

E. Program

"Program" is defined in this policy as any activity, event, recital, lesson, class, or other interaction involving a student, including programs sponsored or operated in whole or in part by the school, on or off campus, during and outside of school hours.

F. Access

Authorized Adults who interact with, and have access to, students are classified in these policies as having high or low contact, whether or not they are employees of the [D.C. Public Charter School]:

(a) Individuals with high contact with students.

Authorized Adults with high access to students include any individual who:

- is involved with the care, supervision, guidance or control of minors and/or students;
- has routine interaction with minors and/or students;
- works with or around students in any school program(s);
- works with or around students on a program that meets regularly or involves multiple interactions;
- has the potential for one-on-one access with a student;
- is responsible for supervising students; or



- is a consistent and regular volunteer for programs involving minors and students;
 or
- interacts with minors and/or students on a frequent basis.

Examples of individuals with high contact with students include:

- Administrators, teachers (full-time, substitute, or student), instructors, nurses, mentors, tutors, aides, paraprofessionals, coaches and their assistants, counselors, security guards, custodians, and/or other school staff;
- individuals who provide community services to students in a home setting; regularly engage in volunteer opportunities that involve students; individuals who have contact or interactions with students via social media or electronic communications; individuals who transport students (on campus or on field trips); supervise overnight programs (on or off campus).

In this section, the institution may want to consider adding any additional titles/individuals that may apply.

(b) Individuals with low contact with students.

Authorized Adults with low access to students include any full or part-time individual who:

- works with or around students for a one-time program (but not programs that meet regularly or involve multiple interactions);
- is always supervised by another authorized adult when interacting with students;
 or
- is not responsible for supervising students.

Examples of individuals with low contact with minors include:

• individuals who work solely with or around other authorized adults and no students; volunteers who are not left alone with minors;

(c) Infrequent visitors

• Examples of infrequent visitors include occasional campus visitors who remain with a group (i.e., 3 or more individuals) or with a permanent school employee at all times, for example one-time career day volunteers, individuals making deliveries to the school (such as UPS or USPS), or attendees at school events.

In this section, the institution may want to consider adding any additional titles/individuals that may apply.



LEA-Wide Policies

II. Enforcement

This policy will be implemented and strictly enforced by the [insert department or office who will be responsible for implementation and enforcement]. Failure to comply will result in corrective action, up to and including termination from the [D.C. Public Charter School]. Violations may also lead to civil or criminal liability.

III. Screening and Selection

All programs must adhere to screening and selection criteria required by the school. All steps must be completed before an Authorized Adult is released to work with minors in a paid or unpaid position. The school reserves the right to repeatedly conduct background screening any time after employment or volunteer services have begun for cause or without cause.

A. Individuals with High Access to Students

Screening and selection of individuals who have high access to minors will include the following:

- 1. A standard application designed to screen applicants for the potential to abuse. The application must include:
 - a. Contact information for the applicants' current employer;
 - b. All previous employers for the previous 20 years;
- 2. Signed school Code of Conduct;
- 3. A multi-state criminal background check that includes county- or city-level information:
- 4. A national sex offender registry check;
- 5. Face-to-face interviews using behaviorally-based standardized questions designed to assess for potential risk to abuse; and
- 6. A minimum of three references, at least one of which is a character reference, using behaviorally-based questions that assess abuse risk.

For any contractors or third-party relationships, ensure contracts provide a requirement for the external agency to comply with all screening requirements defined in DC law and LEA policy.

B. Individuals with Low Access to Students

Screening and selection of individuals who have low access to minors should include:

1. A standard application designed to screen applicants for the potential to abuse;



- 2. Signed school Code of Conduct;
- 3. A national sex offender registry check; and
- 4. A multi-state criminal background check that includes county-level information (unless a criminal background check is not required by District law or by the school's charter).

C. Infrequent visitors

Infrequent visitors are not required to undergo screening of any sort, provided they remain with a group (i.e., 3 or more individuals) or with a permanent school employee at all times.

IV. Training

For any child abuse prevention policy to be effective, the Authorized Adults providing services to students must have adequate, continuous education and training in abuse prevention. All Authorized Adults must annually complete School-approved child abuse prevention and mandatory reporting training courses.

The training must cover, at a minimum: how offenders operate, how abuse happens at educational institutions like [D.C. Public Charter School], the impact of abuse, how to protect youth from abuse, how to prevent false allegations of abuse, how to manage high risk situations, and how to respond and report a range of concerns internally and externally as appropriate (including inappropriate behaviors and policy violations, suspected child abuse and neglect, and youth-to-youth sexual behaviors and abuse).

Completion of all training requirements is required annually at a minimum. See *Appendix B* for sample training content and delivery methods.

DC PCSB recommends that training be completed within the first three months of each school year.

V. Recognizing, Responding, and Reporting^{1,2}

The school is dedicated to maintaining zero tolerance for abuse. As such, it is imperative that everyone actively participate in the protection of minors and be alert to safeguard the safety of students on and off campus.

PRAESIDIUM Anniversary

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¹ As a best practice, schools are encouraged to further develop internal reporting processes that route concerns to the correct department/division. Internal reports may need to include: Title IX, Human Resources, Risk Management, etc.

² As a best practice, schools are encouraged to also include local reporting requirements and to have authorized adults refer to the Child Welfare Gateway:

https://www.childwelfare.gov/topics/systemwide/laws-policies/state/ for additional state specific resources and information.

The policy shall include the following:

Student sexual abuse by staff

- 1. Protocol for the school's response to an allegation of student sexual abuse committed by staff, including procedures governing compliance with the reporting requirements related to mandatory reporting as described in § 4–1321.02 and § 22–3020.52;
- 2. Protocol for contacting the Child and Family Services Agency (CFSA) and informing school leadership of allegations of student sexual abuse committed by staff;
- 3. Protocol for informing the school community about an investigation or allegation of student sexual abuse committed by staff that maintains the integrity of the investigation and protects the confidentiality of those involved [Appendix F];
- 4. Avenues for parents and guardians to report allegations of student sexual abuse to the appropriate authorities, including CFSA and school leadership;
- 5. Mechanisms implementing the provisions of section 7926 of the Every Student Succeeds Act of 2015, approved December 10, 2015 (129 Stat. 2120; 20 U.S.C. § 7926), including penalties for staff that violate the requirements of such statute;
- 6. Guidance concerning limitations on communication between staff and students outside of school, including correspondence by electronic, telephonic, or other means; and
- 7. A list of appropriate resources, services, and information for students and families affected by student sexual abuse, including school-based supports and evidence-based treatment options.

Student-on-student sexual harassment, sexual assault, and dating violence

The policy to address and prevent student-on-student acts of sexual harassment, sexual assault, and dating violence must include the following:

1. A statement prohibiting student-on-student acts of sexual harassment, sexual assault, and dating violence, including an acknowledgment that schools that know or reasonably should know of student-on-student acts of sexual harassment, sexual assault, and dating violence shall take immediate and appropriate action to investigate whether such acts occurred;



- 2. Protocols for the school's response to allegations of student-on-student acts of sexual harassment, sexual assault, and dating violence, including procedures to:
 - (A) Interrupt or stop each specific act of student-on-student sexual harassment, sexual assault, or dating violence, prevent its recurrence, and address its effects, whether or not the incident is the subject of a criminal investigation;
 - (B) Refer complainants to services and advocacy organizations;
 - (C) Provide information to complainants regarding the investigatory process;
 - (D) Institute and resolve disciplinary action; and
 - (E) Protect the confidentiality of complainants in accordance with the Revised Sexual Harassment Guidance: Harassment of Students by School Employees, Other Students, or Third Parties, dated January 19, 2001, as issued by the Department of Education;
- 3. The school's plan to effectuate its obligations, and inform students of their rights, under Title IX of the Education Amendments of 1972, approved June 23, 1972 (86 Stat. 373; 20 U.S.C. §§ 1681 et seq.) ("Title IX"), the Scott Campbell, Stephanie Roper, Wendy Preston, Louarna Gillis, and Nila Lynn Crime Victims' Rights Act of 2004, approved October 30, 2004 (118 Stat. 2260; 18 U.S.C. § 3771), the Human Rights Act of 1977, effective December 13, 1977 (D.C. Law 2-38; D.C. Official Code § 2-1401.01 et seq.), and Chapter 19 of Title 23 of the District of Columbia Official Code, including mechanisms to:
 - (A) Protect the safety of complainants as necessary during the investigation of student-on-student acts of sexual harassment, sexual assault, or dating violence; and
 - (B) Develop and implement a prompt, fair, and impartial procedure for students to file complaints regarding student-on-student acts of sexual harassment, sexual assault, or dating violence, that:
 - (i) Is conducted by school officials or agents who, at a minimum, receive annual training on:
 - (I) Issues related to student-on-student acts of sexual harassment, sexual assault, or dating violence; and
 - (II) How to conduct an investigation that protects the safety of complainants and promotes accountability;



- (ii) Provides the complainant and the accused with the same opportunities to have others present during any school disciplinary proceeding, including the opportunity to be accompanied to any proceeding by an advisor or advocate of their choice; provided, that the school may establish restrictions regarding the extent to which an advisor or advocate may participate in the proceeding, as long as the restrictions apply equally to both parties;
- (iii) Establishes a standard for resolving complaints; and
- (iv) Requires contemporaneous notification, in writing, to both the complainant and the accused, of:
 - (I) The result of any school disciplinary proceeding that arises from an allegation of a student-on-student act of sexual harassment, sexual assault, or dating violence;
 - (II) The school's procedures for the complainant and the accused to appeal the result of the institutional disciplinary proceeding, if such procedures are available;
 - (III) Any change to the result; and
 - (IV) When such results become final;
- 4. Protocol to identify appropriate counseling and intervention strategies for students alleged to have committed student-on-student acts of sexual harassment, sexual assault, or dating violence, including guidelines for reporting such incidents to CFSA if the student's behavior indicates that he or she may be the victim of child sexual abuse or child abuse;
- 5. Guidance concerning the applicability of the policy to student-on-student acts of sexual harassment, sexual assault, and dating violence that occur at school, school events and activities, over social media, and during travel to and from school, school events, and activities; and
- 6. A list of appropriate resources, services, and information for students and families affected by student-on-student acts of sexual harassment, sexual assault, or dating violence, including school-based supports.

Schools shall provide the policy to parents and students and shall make the policy publicly available.

Every member of the school's community should respond and internally notify School Leadership of violations of this policy, violations of the Code of Conduct, inappropriate or



suspicious behaviors that may not rise to the level of abuse, minor-to-minor sexualized behaviors and abuse, and suspected child abuse and neglect. Notifications to the school can be made to a supervisor or an administrator. All reports will be taken seriously.

Some individuals are required to "immediately report or have a report made of such knowledge or suspicion to either the Metropolitan Police Department of the District of Columbia or the Child and Family Services Agency." (§4–1321.02). In the District of Columbia, this includes, among others, school employees and other individuals such as nurses, social service workers, and day care workers. Reporting suspected child abuse and neglect internally within the school does not relieve an individual of his or her obligation under the law to report externally.

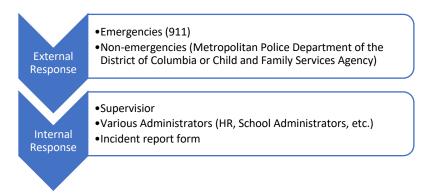
The District of Columbia requires that all school employees who know or have reasonable cause to suspect that a child known to him or her in his or her professional or official capacity has been or is in immediate danger of being mentally, physically, or sexually abused or neglected, **immediately** report such knowledge or suspicion to either:

Metropolitan Police Department of the District of Columbia (MPD) at 911

or

Child and Family Services Agency (CFSA) at 202-671-SAFE (202-671-7233).

For purposes of this policy, the terms child abuse and neglect include, but are not limited to, the following: physical abuse, verbal abuse, sexual abuse, emotional abuse, and neglect.



See Appendix A for additional response guidelines.

The reporting requirements listed above are for purposes of this policy and do not absolve any individuals from any reporting obligations they may have under local or federal law. Failure of an employee to make an internal or external report under this policy may result in disciplinary, civil, and criminal actions.





VI. Conduct with Minors and Students

Adults should serve as positive role models for minors, and act in a caring, honest, respectful, and responsible manner that is consistent with the mission and guiding principles of the [D.C. Public Charter School]. The behavior of all members of the [D.C. Public Charter School] community is expected to align at all times with our Code of Conduct and our Behavioral Guidelines [Appendix D.]

The following policies are intended to assist staff in making decisions about interactions with students. For clarification of any guideline, or to inquire about behaviors not addressed here, contact _____ [INSERT APPROPRIATE CONTACT INFORMATION].

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

No form of abuse will be tolerated and confirmed abuse could result in immediate termination from the school. Student-on-student acts of sexual harassment, sexual assault, and dating violence are also prohibited. Our organization will fully cooperate with authorities if allegations of abuse are made that require investigation, including reporting suspected child abuse and neglect to external authorities.

General Conduct

The Code of Conduct outlines specific expectations of all authorized adults, regardless of level of access or contact with students, as we strive to accomplish our mission together.

- 1. Students will be treated with respect at all times.
- 2. Students will be treated fairly regardless of race, sex, sexual orientation, gender identity, age, or religion.
- 3. Staff will maintain appropriate boundaries when in positions of power over students.
- 4. Staff will avoid affection with students that cannot be observed by others.
- 5. Staff will not discuss their sexual encounters with or around students or in any way involve students in their personal problems or issues.
- 6. Staff will not date or become romantically involved with students.
- 7. Staff will not use or be under the influence of alcohol or illegal drugs in the presence of students.
- 8. Staff will not have sexually oriented materials, including printed or online pornography, on program property or in the presence of students.



- 9. Staff will comply with the program's policies regarding interactions with students outside of the program or school environment.
- 10. Staff will not abuse students in any way including (but not limited to) the following (see more detailed definitions of abuse in section I. General Definitions, A. Abuse):
 - i. *Physical abuse*: hitting, spanking, shaking, slapping, unnecessary restraints
 - ii. Verbal abuse: degrading, threatening, cursing
 - iii. Sexual abuse: inappropriate touch, exposing oneself, sexually oriented conversations
 - iv. Mental abuse: shaming, humiliation, cruelty
 - v. Neglect: withholding food, water, shelter
- 11. Students are prohibited from engaging in the following while at school or while participating in school functions or school sponsored activities:
 - i. Hazing
 - ii. Bullying
 - iii. Cyberbullying
 - iv. Derogatory name-calling
 - v. Ridicule or humiliation
 - vi. Sexual harassment
 - vii. Sexual Assault
 - viii. Dating Violence
 - ix. Sexual activity within school sponsored activities, events, or functions

DC PCSB recommends that schools reference and/or link to their antibullying policies in this section.

- 12. Staff will take steps to prohibit and eliminate bullying behaviors among students.
- 13. Staff will report concerns or complaints about other staff, other adults, or students to a supervisor who can be reached at <insert telephone number> or the <Anonymous Hotline> at <insert telephone number>.



- 14. Staff who know or reasonably should know of student-on-student acts of sexual harassment, sexual assault, and dating violence will take immediate and appropriate action to report or cause an investigation into whether such acts occurred.
- 15. Staff who knows or has reasonable cause to suspect that a child known to him or her in his or her professional or official capacity has been or is in immediate danger of being a mentally or physically abused or neglected child, as defined in § 16-2301(9), shall immediately report or have a report made of such knowledge or suspicion to either the Metropolitan Police Department of the District of Columbia or the Child and Family Services Agency. Please refer to the OSSE specific guidelines regarding mandated reporting:
 - https://osse.dc.gov/page/mandatory-reporting-and-educator-discipline.
- 16. Staff will not have engaged in or been accused or convicted of child abuse, indecency with a child, or injury to a child.



APPENDICES

State Regulations on Child Abuse and Reporting Requirements Appendix A. Appendix B. Recommended Training Content Appendix C. Sample Codes of Conduct Appendix D. Appropriate and Inappropriate Interactions Between Adults and Students Appendix E. Guide and Resources to Develop Procedures for Monitoring High-Risk Activities Appendix F. Sample Crisis Response Plan Resources and Information for Students, Parents, and Families Appendix G.

Policy Acknowledgement Form

Appendix H.

Appendix A. State Regulations on Child Abuse and Reporting Requirements

Responding to Allegations or Incidents of 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 as long as the report was made in good faith and without malice.

The District of Columbia requires that all school employees who know or have reasonable cause to suspect that a child known to him or her in his or her professional or official capacity has been or is in immediate danger of being mentally, physically, or sexually abused or neglected, **immediately** report such knowledge or suspicion to either:

Metropolitan Police Department of the District of Columbia (MPD) at 911

or

Child and Family Services Agency (CFSA) at 202-671-SAFE (202-671-7233).

For additional information regarding District of Columbia Mandated Reporting requirements, click here to visit the Child Welfare Information Gateway.

In addition to reporting to state authorities, staff and volunteers are required to report any suspected or known abuse of youth 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:

- 1. Immediate supervisor
- 2. School Administrators

Reporting suspected or known abuse or neglect internally within the school **does not** relieve an individual of his or her legal obligation to make an external report to either MPD or CFSA.

Any individual may report suspected abuse or neglect to school leadership or to an external agency, whether or not he or she is obligated to do so by law.



Additional Guidelines for Staff 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 and, if you have reasonable suspicion, to the appropriate external authorities 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.

Sample Procedures for Reporting 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 youth. In the event that staff observe any suspicious or inappropriate behaviors and/or policy violations that do not rise to the level of abuse on the part of other staff or volunteers, it is their personal responsibility to immediately report their observations to their supervisor.

Examples of Suspicious or Inappropriate Behaviors Between Staff and Youth

- Violation of the abuse prevention policies described above
- Seeking private time or one-on-one time with a student
- Buying gifts for individual students
- Making suggestive comments to students
- Picking favorites



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

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 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 conduct an investigation.
- Keep reporting until the appropriate action is taken.

Sample Procedures for Responding to Student-to-Student Sexual Activity or Abuse

Student-to-student sexual behaviors or abuse can include inappropriate touching, exposing body parts, using sexualized language, making threats of sexual activity, engaging in sexual activity, sexual harassment, sexual assault, and similar types of interactions.

If an authorized adult witnesses or has a suspicion of student-to-student sexual behaviors or abuse, including sexual harassment, sexual assault, and dating violence, they are instructed to follow these guidelines:

Guidelines for Staff Responding to Student-to-Student Sexual Activity

- If you observe sexual activity between students, immediately separate them.
- Calmly explain that such interactions are not permitted, address the effects, and separate the students.
- Notify your supervisor.
- Complete the necessary paperwork including what you observed and how you responded.



- Follow your supervisor's instructions regarding notifying the authorities, complying with Title IX processes, and informing the parents of the students involved.
- Protect the confidentiality of complainants in accordance with the <u>Revised</u>
 <u>Sexual Harassment Guidance: Harassment of Students by School Employees</u>,
 <u>Other Students</u>, or <u>Third Parties</u>, as issued by the Department of Education.
- Provide a list of appropriate resources, services, and information for affected students and families.

In addition to the above guidelines and in accordance with Title IX of the Education Amendments of 1972, LEAs must develop internal procedures for informing students of their rights, how to respond to and investigate student-on-student acts of sexual harassment, sexual assault, and/or dating violence, and how the LEA will comply with all other requirements under Title IX. This procedure should, at a minimum, include mechanisms for:

- ✓ Students to file complaints;
- ✓ Providing specialized training to school officials designated to receive and respond to complaints;
- ✓ Protecting the safety of complainants;
- ✓ Establishing a standard for resolving complaints;
- ✓ Providing information to complainants regarding the investigatory process;
- ✓ Identifying appropriate counseling and intervention strategies for alleged students; and
- ✓ Providing a list of appropriate resources, services, and information for students and families affected by student-on-student acts of sexual harassment, sexual assault, or dating violence, including LEA based supports.



Appendix B. Sample Curriculum for Abuse Prevention Training

LEAs have the autonomy to select trainings that meet these requirements and their schools' needs.

Sample Curriculum for Abuse Prevention Training

- How sexual abuse of students occurs in a school setting;
- Impact of sexual abuse;
- Types of offenders and how they operate;
- Protecting yourself from false allegations;
- Identifying and managing high-risk situations;
- Methods to identify and prevent abuse between students;
- Barriers to adults reporting their concerns;
- How to recognize red flags and boundary violations;
- Steps for how employees and volunteers should respond to boundary violations, suspicious or inappropriate interactions, or policy violations;
- Definitions of abuse;
- Mandated reporter requirements;
- What to do if a student discloses abuse; and
- How to respond to incidents of sexual activity between students.

Praesidium also recommends other abuse prevention training content that is targeted toward supervisors.

Effective supervision practices related to abuse risk management:

- Overview of supervisor's role in abuse prevention;
- Supervision strategies that can reduce risk; and
- Using teaching moments in supervision.

For supervisors who respond to suspicious or inappropriate behaviors or allegations of abuse, the training should also address:

- How to create a culture for responding and reporting; and
- Steps to take when employees or volunteers report suspicious or inappropriate behaviors.

For individuals who make hiring decisions, techniques for screening out potential offenders:

- Why screening and selection is important;
- The limitations of criminal background checks;
- Managing program screening resources;
- How to use the application to assess for abuse risk;
- Behavioral interviewing techniques using questions designed to assess for abuse risk; and
- Best practices in reference checking.



Sample Abuse Prevention Information for Parents

Your LEA will provide parents with a written document explaining your policies and procedures related to abuse prevention. This document should, at a minimum, include the following:

- ✓ Code of conduct for employees and volunteers.
- ✓ Policies regarding appropriate and inappropriate boundaries, including:
 - Physical interactions;
 - Verbal interactions;
 - One-on-one interactions;
 - o Outside contact between adults and students; and
 - Electronic communication, including text messaging, e-mail, social media, etc.
- ✓ How to report concerns within the LEA.



Sample Abuse Prevention Training for Parents and Guardians

Parent training should include the following:

- ✓ Relevant LEA Policies
- ✓ The Parent Role in the Prevention Partnership
- ✓ Information About Sexual Abuse
 - What to discuss with their child(ren) about sexual abuse
 - o Parents should provide youths with an age-appropriate definition of abuse.
 - Parents should encourage youths to tell them immediately if they have a problem or someone makes them feel uncomfortable.
 - Parents should assure youths that they will not get in trouble if they tell about abuse.
 - Warning signs that a youth feels uncomfortable
 - Common reasons youths do not report abuse
 - Ways to Protect Your Youth from Abuse
 - How to respond if a youth discloses abuse
 - Red flags behaviors often exhibited by offenders
- ✓ How to report concerns
 - The names and phone numbers of at least two people within the organization that parents can call with concerns.
 - The local child abuse reporting hotline number.



Appendix C. Sample Codes of Conduct

Sample Code of Conduct

- Our employees and volunteers will exhibit the highest ethical best practices and personal integrity.
- Our employees and volunteers will provide a professional work environment that is free from physical, psychological, written, or verbal intimidation or harassment.
- Our employees and volunteers will not physically, sexually, or emotionally abuse or neglect any child or student.
- o Our employees and volunteers will share concerns about suspicious or inappropriate behavior with their supervisor or administrator.
- Our employees and volunteers will report any suspected abuse or neglect of a child or student to the DC authorities.
- Our employees and volunteers will accept their personal responsibility to protect students from all forms of abuse.



Appendix D. Appropriate and Inappropriate Interactions Between Adults and Students

A. Physical Contact

Our program has implemented a physical-contact policy that will promote a positive, nurturing environment while protecting students and personnel from misunderstandings. The following guidelines are to be carefully followed by all staff and volunteers working with students:

B. Verbal Interactions

Staff and volunteers are prohibited from speaking to students 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 students. Staff and volunteers are not permitted to discuss their own sexual activities with students.

The program's policies for appropriate and inappropriate verbal interactions are:

Appropriate Verbal Interactions	Inappropriate Verbal Interactions	
Positive reinforcement	Name-calling	
Appropriate jokesEncouragementPraise	 Compliments relating to physique or body development Discussing sexual encounters or in any way involving students in the personal problems or issues of personnel 	
	 Secrets Cursing Off-color or sexual jokes Shaming Belittling Derogatory remarks Harsh language that may frighten, threaten or humiliate students Derogatory remarks about the student or his/her family 	

C. One-on-One Interactions

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

In those situations where one-on-one interactions are approved, personnel 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 student, 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 personnel (i.e., administrators, other employees) that you are alone with a student 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.

D. Off-Campus/Outside Contact

Many cases of organizational abuse occur off campus. This contact outside of regularly scheduled activities may put program personnel, students, and our school at increased risk. Our program has determined that the following forms of outside contact are appropriate and inappropriate:

Appropriate Outside Contact	Inappropriate Outside Contact
 Taking groups of students on an outing Attending sporting activities with a group of students Attending functions at a student's home, with parents present for the duration Home visits, with parents present 	 Taking one student on an outing without the parents' written permission Visiting one student in the minor's home, without a parent present Entertaining one student in the home of a program personnel A lone student spending the night with a program personnel

When outside contact is unavoidable, ensure that the following steps are followed:

- Supervisors should identify for personnel what types of outside contact are appropriate and inappropriate.
- Ensure that staff have the parents' permission to engage in outside contact with the student and parents have executed a release-of-liability statement.

E. Electronic Communication

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

All communication between staff and students must be transparent. The following are examples of appropriate and inappropriate electronic communication.



Appropriate Electronic Communication		Inappropriate Electronic Communication	
•	Sending and replying to emails and text messages from students ONLY when copying in a supervisor or the student's parent	•	Harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning or humiliating comments
•	Communicating through "organization group pages" on Facebook or other approved public	•	Sexually oriented conversations Private messages between staff and volunteers
	 "Private" profiles for staff and volunteers which students cannot access 		with students
•		•	Posting pictures of students on social media sites
		•	Posting inappropriate comments on pictures
		•	"Friending" students on social networking sites

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

Electronic communication provides a venue for private communication between personnel and students. Therefore, with electronic communication policies, our school stresses transparency in all interactions.

F. Gift Giving

Offenders routinely groom minors by giving gifts, thereby endearing themselves to the minor. They might instruct the student to keep the gifts a secret which then starts teaching the student to keep secrets from parents. For this reason, personnel should only give gifts to large groups of students (i.e., an entire class or team), and only under the following circumstances:

Administration must be made aware of and approve the gift, and parents must be notified.

G. Student-to-Student Activities and Interactions

Most serious incidents of student-to-student 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. The following interactions are prohibited, and Authorized Adults are obligated to enforce them:



Prohibited Youth-to-Youth Interactions

- Hazing
- Bullying
- Sexual harassment
- Derogatory name-calling
- Singling out one student for different treatment
- Ridicule or humiliation
- Sexual activity during school programming, at a school event, trip, or other sponsored event.
- Sexual assault
- Dating violence



Appendix E. Guide and Resources to Develop Procedures for Monitoring High-Risk Activities

A. Bathroom Activities

Incidents of abuse often occur in the bathrooms, including student-to-student sexual activity. Therefore, the following supervision guidelines are recommended:

Option 1: Group Bathroom Breaks

- 1. Whenever possible, staff and volunteers should take groups of two or more students to the bathrooms for "group bathroom breaks." One adult should not escort one student; always use the "rule of three" or more. Junior staff or staff in training should not escort students to the bathrooms.
- 2. If the bathroom has only one stall, only one student should enter the restroom at a time while the other students wait outside with staff and volunteers. If there are multiple stalls, staff and volunteers should only send in as many students as there are stalls.
- 3. Staff and/or volunteers should then stand outside of the bathroom with the door ajar to hear what is going on inside the bathroom.

Option 2: Monitoring Bathrooms

- 1. In some settings, group bathroom breaks are not always feasible. In these circumstances, students should ask permission before using the bathrooms, so that staff and volunteers know who is going to the restroom and when.
- Staff and volunteers should randomly and periodically monitor bathrooms to ensure that students are not lingering there. It is important that staff and volunteers periodically check restrooms so that students know that an adult could walk in at any time.

If possible, staff and volunteers should use staff/adult-only bathrooms.

B. Locker Room Activities

Personnel and students must shower at different times. Create schedules that will permit supervision of the students while personnel shower.

While students change clothes and shower, at least one personnel should stand in the locker room doorway and within earshot of the students. Ensure that only one student is in each shower (Consider installing shower curtains that do not go all the way to the floor, so that personnel can easily see how many students are in each shower stall).

C. Transition Times and Free Times (Including Before and After the Program)

Transition and free times, including those before and after school, pose a higher risk for incidents because during these times, personnel may not be assigned a particular group



of students to supervise. To decrease the risk of incidents, implement the following supervision guidelines:

- 1. Designate certain areas at the program as off-limits during these times by setting specific and narrow geographic boundaries in the program areas.
- Depending on the age of students, ensure that personnel are assigned specific areas to supervise during transition times and free times. This "zone monitoring" ensures that all accessible areas are monitored. Assign more personnel to highrisk areas and activities (i.e., playgrounds, isolated areas, etc.).
 - a. For example, in programs with playground areas, assign personnel to certain "zones" and around the perimeter of the area. If the playground includes play structures that limit line-of-sight supervision (such as tunnels, slides, or jungle gyms), assign personnel to these areas as well. Personnel should not be standing or sitting in groups while students play on the playground.
- Create specific bathroom procedures during transition times and free times. Then, designate which bathrooms will be available to students. Personnel should be posted at (or responsible for spot-checking) each available bathroom to actively monitor the students.
- 4. Require supervisors to conduct periodic sweeps of the entire activity area. If students are lingering outside of the planned activity area, the supervisor should encourage these students to return to the designated areas.
- 5. Require the presence of an upper-level supervisor during transition and free times (including before and after the program).

D. Evening Events and Activities:

Night games and evening activities are often high risk because students of mixed ages interact in a less structured environment. The following guidelines can help to decrease those risks:

- 1. Apply the same procedures used to monitor transition and free times, as listed above.
- 2. Ensure that personnel are assigned to supervise specific areas during both night games and the transition times before and after the events.
 - a. For example, while students are waiting in a large group before the night games, personnel should be spread out in a "zone monitoring" formation – i.e., one personnel in each corner of the area, one or more personnel posted near the exits, etc. This "zone monitoring" ensures that all accessible areas, adults, and students are monitored.
- Conduct head counts at random intervals throughout the activity. At some point during night games, each employee should formally ascertain that all of his or her students are present. During some activities, consider stopping the game to make



sure that all students are present. Create roll sheets that counselors must turn in at the end of the night.

4. Require the presence of an administrator or supervisor during night games.

E. Transporting students

Transporting students may increase the risk of abuse or false allegations of abuse because personnel may be alone with a student or may make unauthorized stops with a student, e.g., to the personnel's home.

When it is necessary to transport students on field trips and extracurricular activities, program personnel must adhere to the following:

- Administrators are notified.
- 2. When possible, the "rule of three" is used when transporting students in vehicles. At least two adults are required to transport a single student. At least two students must be present if transported by a single adult.
- 3. Students are never transported without written permission from a parent.
- 4. Students are transported directly to their destination. No unauthorized stops are made.
- 5. Personnel document beginning and ending time and mileage, the names of students and personnel who are involved in transportation, purpose of the transportation, and destination.
- 6. Personnel avoid unnecessary physical contact with students while in vehicles.
- 7. When possible, personnel avoid engaging in personal conversations with students.

When transporting students by bus or van:

- 1. Determine the number of personnel necessary to adequately supervise the students (e.g., one personnel to 10 students).
- 2. The driver should not be assigned as a supervisor for the students.
- 3. Personnel should be randomly seated throughout the bus for easier supervision of students, with at least one personnel in the front of the bus and one in the far rear. Personnel should sit in the aisle or in an outside seat, so they can supervise students on the bus.
- 4. Students should be seated by grade, gender, and behaviors.
- 5. On overnight bus or van trips, male personnel should not sit with female students and female students should not sit with male students. Personnel should not share blankets with students or sleep in the same seat with a student.
- 6. Take a head count or roll call before loading and after unloading vehicles.

When public transportation is used:



- 1. Determine the number of personnel necessary to adequately supervise students (e.g., one personnel to ten students).
- 2. Students should remain in one area of the bus or metro, if possible.
- 3. Personnel that are assigned to a group should remain with that group on the bus.
- 4. Take a head count or call roll immediately after entering and leaving the bus.

F. Day Trips, Field Trips, or Outings

Field trips present unique risks for the safety of students. Large groups are difficult to monitor, and students may be more likely to act out sexually in a less structured environment. An ill-intentioned adult may try to arrange to meet with a student. It is important to be aware of these risks and take measures to minimize them.

All field trips or outings must be in compliance with [D.C. Public Charter School] Board abuse prevention policies. Additionally, all such activities must meet the following guidelines:

- 1. Obtain written prior approval by a supervisor.
- 2. Obtain written parental permission.
- 3. Set a ratio for personnel-to-students. Require at least two unrelated adult personnel.
- 4. Require that students are monitored at all times.
- 5. When using public bathrooms, personnel should escort all students to the bathroom as a group. Personnel should first check the bathroom (prior to the students going in) to ensure other adults are not using the bathroom. If possible, personnel should wait until other adults are no longer in the bathroom and then begin to send students in small groups. If it is not possible to wait for other adults to leave the bathroom, personnel should stand at the doorway and verbally checkin with the students to ensure that they are not lingering and to inform other adults that the students are being supervised.
- 6. While supervising or assisting private activities, such as dressing or showering students, personnel are never alone with a single student.
- 7. Specific Recommendations for Museums, Parks, Amusement Parks, Sporting Events, etc.

If the trip is to a location where students will be interacting in a large space and it is not possible to assign specific personnel to specific groups of students, then:

a. Set boundaries at the location. Tell the students where they may and may not go. Then post personnel around the boundaries and at the entrance and exit points.



- b. Assign remaining personnel to monitor specific areas. Post at least one personnel near the bathrooms. Personnel should also be assigned to actively supervise the students.
- c. Personnel must escort all students to the bathroom as a group. Personnel should check the bathroom prior to the students going in, to ensure other adults are not inside. If possible, the personnel should wait until other adults are no longer in the bathroom, and then send in small groups of students. The personnel should then stand at the doorway and verbally check in with the students to ensure that they are not lingering, and to inform other adults that the students are being supervised.
- d. Students should check in at meeting points at least once every hour.

G. Overnight Trips and Events

Overnight stays present unique risks to students and personnel. They often involve changing clothes, groups of both genders and different ages in a more intimate atmosphere than usual, more unstructured activities, and increased supervision demands for personnel.

1. Supervision Guidelines

- a. Goals for chaperone ratio on domestic trips are 1:10 and on international trips are 1:6. Actual ratios may need to vary either upward or downward based upon individual trip factors. Target ratios will be used unless an alternate is approved by the Director or Supervisor of the program.
- b. Students are to be supervised at all times. They must be accompanied by a chaperone at all times that they are not in their rooms. However, the lead chaperone may designate limited times and areas in which students, on a buddy system basis of two or more students together, may walk around unaccompanied by a chaperone. In all such instances, the lead chaperone must ensure the following:
 - Physical boundaries are clearly defined;
 - Students check in at meeting points at a minimum of three-hour intervals with no one dismissed until all have checked in safely:
 - Students must stay within areas accessible to the general public;
 - Students who are non-compliant lose privileges; and
 - Students have the lead chaperone's cell phone number and lead chaperone has the students' cell phone numbers.

2. Sleeping Arrangements

a. Overnight stays at private homes are prohibited unless as a part of a formal Homestay program or event.



- b. For overnight stays in cabins or group rooms, adhere to the following procedures:
 - Supervising personnel should be placed in bunks to maximize supervision around the cabin and in a way that decreases the chances of students sneaking out (such as by the door).
 - Prohibit chaperones from changing in front of students.
 - Prohibit chaperones from showering with or at the same time as students.

3. Chaperone Guidelines

- a. Chaperones are on duty at all times. There is no time off on a school trip. Chaperones are required to be active supervisors of the students and not passive observers.
- b. All chaperones are to be on duty in the halls or cabins at night until after lights out and all rooms are quiet. Night security is required, and chaperones may retire after night security is on duty. Night security may not be released until relieved by chaperones.
- c. Chaperones are to regularly check rooms until after lights out. All doors are to remain unbolted and without security locks so that chaperones can enter with the room key unannounced at any time and students can exit to the hall and security guard/chaperones at any time. All keys are to be retained by the chaperones. Taping of doors is recommended when possible.



Appendix F. Sample Crisis Response Plan for Allegations or Incidents of Abuse

Prior to Allegation/Incident

- Determine who from your LEA will be on the Critical Incident Management Team.
- Educate all employees and volunteers on what to do if someone alleges current or historical abuse involving an LEA adult, employee, or volunteer.
- All employees and volunteers should know how to fulfill their duties as a mandated reporter.
- All employees and volunteers should be trained on how to complete the appropriate critical incident forms or other required documentation for your LEA.

Immediate Safety

- Follow all mandated reporting requirements and contact the authorities as appropriate.
- Where applicable, prevent the alleged perpetrator from having further access to students until a thorough incident review is completed. Before beginning an internal incident review, verify with local authorities that this will not interfere with their investigation.
- If the alleged perpetrator is an employee, follow progressive discipline procedures accordingly. This may involve suspending the alleged perpetrator during the investigation.
- When applicable and appropriate, notify other employees.

Initial Communication Plan

- Designate a point person to respond to all inquiries from parents, the media, and other stakeholders.
 - o Prepare a short media statement in advance of getting a media inquiry.
 - All oral and written communication should speak with a voice of compassion and confidence.
 - All employees and volunteers should know how to refer media inquiries to the appropriate person.
- As soon as possible, meet in person (not over the phone) with identified victims and their parents.



- o Reassure them that you are taking this seriously.
- Find out what response they expect and be prepared to explain support you will offer, such as counseling.
- Reach out in writing to parents of all children currently attending your LEA as well as those with past contact with the alleged perpetrator.
 - The message should communicate:
 - Empathy: Begin by stating that such incidents run counter to your LEA's values.
 - **Facts**: Include a summary of the incident, including applicable information about the arrest, suspension, investigation, etc.
 - Contact Request. Ask parents to contact you or the specified authorities if they suspect their child may have been abused.
 - Your Response: Explain that you are fully cooperating with the authorities. Describe proactive steps you are taking such as offering resources to parents, hosting a parent meeting, training staff, and conducting an independent investigation to learn from this incident so you can prevent it from happening again.
- Host a parent meeting to speak directly with concerned families and directly answer any questions before rumors or misinformation is spread.
 - o Communicate as much information as you can about the incident.
 - Provide information regarding the proactive steps leadership is taking in response to the incident.
 - Describe resources you are providing families and give parents a chance to ask questions.
 - Provide parents with information about how to talk to their children about abuse.

Ongoing Communication and Response

- Determine how to manage ongoing relations with authorities, parents, the community, and media.
 - Consider adding a page to your website with updated details about the incident.
 - Designate specific individuals in your organization to handle various communications and outreach efforts.



Promote Prevention at All Levels of the LEA

- Educate parents on abuse prevention. Offer a workshop during which parents can learn how to protect their children from abuse. This is an educational session that is different from the parent meeting described above.
- Provide a student education program to all students in your LEA on how to protect themselves from abuse and how to express concerns.
- Train (or –re-train) all employees and volunteers on how to identify and report "redflag" behaviors that do not rise to the level of suspected abuse. This is an important part of the overall response and ongoing prevention effort.



Appendix G. Resources and Information for Schools, Students and Families

Praesidium - Praesidium's team of experts knows how molesters operate in organizations and how sexual activity occurs between children in programs. https://website.praesidiuminc.com/wp/

Safe Shores – The DC Children's Advocacy is a direct service nonprofit organization dedicated to supporting and working directly with child victims of sexual and physical abuse in the District of Columbia.

https://www.safeshores.org/about/

DC Child & Family Services Agency - The DC Child and Family Services Agency (CFSA) is the public child welfare agency in the District of Columbia responsible for protecting child victims and those at risk of abuse and neglect and assisting their families. https://cfsa.dc.gov/service/report-child-abuse-and-neglect

DC Metropolitan Police Department

911 or MPD School Safety Division - (202) 576-3408

Mandatory Reporting - School officials and teachers employed by local education agencies are mandatory reporters (See DC Code § 4-1321.02(b)). If a school official or teacher knows, or has reasonable cause to suspect, that a child has been or is in immediate danger of being mentally or physically abused, the LEA shall immediately report such knowledge or suspicion to the Metropolitan Police Department (MPD) or the Child and Family Services Agency (CFSA).

https://osse.dc.gov/page/mandatory-reporting-and-educator-discipline

Training for Mandated Reporters

https://osse.dc.gov/event/training-mandated-reporters

Rape, Abuse & Incest National Network (RAINN) - RAINN provides comprehensive sexual misconduct education and workshops for public and private educational institutions. RAINN also provides subject matter experts for workshops to educate communities on sexual misconduct awareness, prevention, and response strategies. https://www.rainn.org/

American Psychological Association - Protecting Our Children From Abuse and Neglect

https://www.apa.org/pi/families/resources/abuse

National Education Association - Best practices for supporting and educating students who have experienced domestic violence or sexual victimization. http://www.nea.org/home/62845.htm



Appendix H. Policy Acknowledgement Form

Acknowledgement of Policy

I have received a copy, read and voluntary agree to comply with the school's *Student Protection Policy*.

Plea	se Print	
	Name	
	Position	
	Campus	
	Department	
	Signature	
	Date	
	Date	