Sexual Molestation and Abuse Prevention Guidelines

Introduction
In 2004, due to increasing awareness of the problem of child sexual abuse in our nation’s schools, The Ventura County Schools Self Funding Authority (VCSSFA) reviewed and improved on existing abuse prevention procedures. These changes aim to create the safest possible environments for students and employees in Ventura County and the Conejo Valley Unified School District (CVUSD). In conjunction with this effort, this manual was created to provide a quick and easy reference to these procedures and help you recognize high-risk situations before an incident of abuse occurs.

The CVUSD understands that you already play an important role in children’s lives and serving as a protector is a natural extension of that role. Your principal and the superintendent are available to answer any questions you may have regarding these procedures. Your dedication to the children in your care is essential, and the CVUSD knows you are committed to protecting them from the devastating effects of sexual abuse.

Overview of Procedures
Screening and Selection
The CVUSD understands that the first step in creating a safe environment is careful screening and selection of those who work closely with children in our schools. Before being approved for hire, all applicants for Certificated or Classified positions (regular, temporary and substitute) must complete the following items:

1. A standardized application with questions that assess risk for abuse.
2. At least one face-to-face interview with a personnel representative.
3. Thorough checks of references,
4. A criminal background check through the Department of Justice (fingerprinting).
5. Employee statement of compliance with the CVUSD’s Code of Conduct and abuse prevention policies.

Any applicant who has been convicted of a violent or serious felony will not be hired unless he or she has obtained a certificate of rehabilitation and pardon. The CVUSD will not employ or retain any person who has been convicted of any sexual offense.
Education and Training

Employees who are trained in abuse prevention are more likely to understand their role as protector, to recognize the signs that abuse is occurring, and to report suspicious or inappropriate behaviors. Trained staff members are also less likely to place themselves in situations where they could be falsely accused.

In order to educate employees how to detect the warning signs of abuse, all CVUSD contracted personnel are required to complete the following training course content:

- Effects of sexual abuse
- Types of child molesters
- Characteristics of abusers
- How child molesters operate: Access, Privacy, Control
- Identifying and managing high-risk situations such as nap time, bathroom use, transition times, and free times
- Methods to identify and prevent abuse between students
- Protecting him/herself from false allegations
- Application of introductory content to current situations
- Review of current school cases

Interactions and Conduct

The District has developed specific guidelines for appropriate interactions with students. With clear standards in place, everyone knows the rules, violations are more easily detected, and false allegations are less likely to occur.

1. **Code of Conduct**
   All CVUSD contracted personnel are required to sign the District’s Code of Conduct as a condition of employment.

2. **Physical Interactions**
   Requirements that clearly define appropriate and inappropriate physical interactions between staff and students protects all parties. CVUSD guidelines for appropriate and inappropriate physical interactions are:

   **Appropriate Physical Interactions**
   - Side hugs
   - Shoulder-to-shoulder or temple hugs
   - Pats on the shoulder or back
   - Handshakes
• High-fives and hand slapping
• Verbal praise
• Pats on the head when culturally appropriate
• Touching hands, shoulders, and arms
• Arms around shoulders
• Holding hands (with smaller children in escorting situations)

Inappropriate Physical Interaction
• Full frontal hugs
• Kisses on the mouth
• Touching bottom, chest or genital areas
• Showing affection in isolated areas of the building
• Staff sleeping in bed with a child
• Touching knees or legs
• Wrestling
• Piggyback rides
• Tickling
• Any type of massage given by or to a child
• Any form of affection that is unwanted by the child or the staff
• Compliments that relate to physique, body development
• Sitting on teacher’s lap
• Carrying children
• Meeting off campus with a student alone

3. Verbal Interactions
Guidelines that clearly define appropriate and inappropriate verbal interactions between staff and students protects all parties. The District guidelines for appropriate and inappropriate verbal interactions are:

Appropriate Physical Interactions
• Positive reinforcement
• Appropriate jokes
• Encouragement
• Praise

Inappropriate Physical Interactions
• Name calling
• Discussing sexual encounters or in any way involving children in the personal problems or issues of staff
• Telling secrets
• Cursing or profanity
• Telling off-color or sexual jokes
• Shaming
• Belittling
• Using harsh language that may frighten, threaten or humiliate students
• Making derogatory remarks about the student or about his/her family
• Personal texting, emails, or phone calls

4. **Discipline Practices**
   A policy that clearly defines inappropriate discipline practices protects all parties. The policies for inappropriate discipline practices are:

**Inappropriate Discipline Practices**
- Hitting
- Spanking
- Shaking
- Slapping
- Withholding food, light, or medical care
- Name calling
- Shoving
- Withholding bathroom privileges
- Public embarrassment
- Pulling hair or ears
- Biting
- Pinching
- Shaming
- Using derogatory remarks
- Ostracizing
- Using mechanical, tape, or rope restraints
- Punishing for toileting accidents
- Allowing a student to discipline a student

5. **One to One Situations**

Most abuse occurs when an adult is alone with a student. The District aims to eliminate or reduce these situations. However, when they are necessary, staff should observe the following District guidelines to manage the risk of abuse or false allegations of abuse:
Avoid physical affection that can be misinterpreted. Limit affection to pats on the shoulder, high-fives, and handshakes.
Document any unusual incidents, including disclosures of abuse or maltreatment, behavior problems and how they were handled, injuries, or any interactions that might be misinterpreted;
Leave the door open or move to an area that can be easily observed by others passing by
Ask other staff to randomly drop in
Do not cover windows with posters
If a student walks into a classroom alone, walk outside the door.

6. Contact Outside of Regular School Activities

Many cases of organizational abuse occur off-site and outside of regularly scheduled school activities. Contacts outside of regularly scheduled activities may put students, staff, and the District at increased risk. The District strongly discourages personnel from contacting students outside of regular school activities.

Under some circumstances, school personnel may find it beneficial to spend time with students outside of regularly scheduled school activities. To ensure the safety of all involved, school personnel must adhere to the following practices:

- All contact must be approved in writing by the appropriate school administrator in advance of the contact. The school personnel making the request must describe the purpose of the contact, the nature of the activity, when the contact will occur, where the contact will occur, and the names of other students and adults who will be present.
- The parent(s) of the students involved must also be notified.
- School personnel are never to be alone with a student(s).
- Under no circumstances may school personnel and students share sleeping quarters.
- Under no circumstances may school personnel disrobe in the presence of students.
- From time to time, school administrators must question students who spend time with school personnel outside of regularly scheduled school activities to describe the activities and ensure all is appropriate.
- In any meetings or gathering with students off campus there must be at least 2 other adults.

7. Gift Giving

Molesters routinely groom students by giving them gifts as a way to endear themselves to students. Sometimes they instruct the student to keep the gifts a secret; this then starts to
teach the student to keep secrets between the molester and the student. For this reason, staff should only give gifts to student upon advising administration and receiving approval to do so.

8. **Transporting Students**

Transporting students may increase the risk of abuse or false allegations of abuse because a staff person may be alone with a student or may make unauthorized stops with a student, e.g., to the staff person’s home. The District strongly discourages personnel from transporting students outside of regular school activities.

Under some circumstances, such as field trips or extra-curricular activities, a staff member may find it necessary to transport a student. To ensure the safety of all involved, school personnel must adhere to the following practices:

- Students must never be transported without written permission from a parent
- Students should be transported directly to their destination. No unauthorized stops should be made
- Staff should avoid unnecessary physical contact with student while in vehicles
- Administrators must be informed

9. **Student-to-Student Interactions**

Most incidents of serious student-to-student abuse are preceded by more subtle incidents like name-calling, taunting, or rough-housing. Interrupting these interactions early, and establishing well-known standards of conduct, can keep the school environment safe. The District recognizes that the following interactions are high-risk and should be prohibited:

- Hazing
- Bullying
- Derogatory name-calling
- Games of truth or dare
- Singling out one adult or student for differential treatment
- Ridicule or humiliation

**Monitoring and Supervision**

The District recognizes that monitoring and supervision are critical functions of abuse prevention that provide protection to students, staff, and the District. When interactions are monitored, allegations of improprieties or wrongful acts are more easily and accurately
investigated and resolved. The District has established the following policies to ensure that all County Office personnel understand their role in this process.

1. **Administrative Visits**
   District and school administrators regularly monitor staff interactions with students in different activities in order to ensure that classrooms are well managed and that policies are observed.

2. **Ratios**
   Each class or program should follow appropriate state ratio requirements in order to ensure adequate monitoring of students and prevent staff from being too overwhelmed to monitor the activities of other staff members. Personnel should be aware of ratio requirements for all classes or other activities that they are responsible for monitoring.

3. **Mixed Age Groups**
   In most incidents involving a student abusing another student, the student are from different age groups. Each school is responsible for establishing specific guidelines for additional monitoring and supervision of programs that involve student from different age groups. Personnel should be aware of their school’s requirements for monitoring programs that mix age groups.

4. **Restrooms**
   Most abuse in schools occurs in the restrooms. Each school is responsible for developing restroom procedures that are appropriate based on physical aspects of the school structure and the age of student who attend the school. Personnel should be aware of their school’s unique restroom guidelines, which should include:
   - Extending exceptions to the policy in emergencies only;
   - Making note of students who abuse the exception;
   - Instructing students on which restrooms to use;
   - Not permitting students to linger in the restroom; and
   - Assuring that all staff, including security personnel, routinely duck into restrooms and announce their presence during passing periods and any time they travel throughout the school.

5. **Unused or Limited Use Areas**
   High-risk areas in schools include bathrooms, out-of-the-way hallways and stairwells, unlocked or unused rooms, outdoor areas with obstructed visibility, and parking lots. Inadequate monitoring of these areas may increase the risk of abuse. The District has designated unsafe areas that are off limits to students except when supervised. Personnel should be aware of these policies regarding monitoring unused or limited use areas, which should include:
   - The School’s keep unused rooms locked.
• Classrooms, meeting rooms, and offices have windows that permit observation. (No window coverings)
• Classroom windows should remain unobstructed.
• Bathroom doors should remain open as long as privacy can be maintained.
• Students are prohibited from entering staff-only areas.
• Stage curtains should remain open.
• The District uses limited video surveillance equipment to monitor high-risk locations and for suspicious behaviors.
• The District requires administrative staff to monitor high risk areas.
• Staff is encouraged to always involve themselves in supervision of activities and/or areas not in their immediate responsibility.

Reporting and Responding

Once a concern has been expressed about the treatment of a student or an allegation of abuse has been made, steps should be taken immediately to reduce any subsequent risk to the student, to the accused staff member, to the school and the District. CVUSD has developed the following guidelines to encourage reporting, appropriately manage investigations, and standardize sanctioning for inappropriate behaviors.

1. CVUSD uses multiple methods to encourage staff to report suspected abuse, suspicious, or inappropriate behaviors. CVUSD permits anonymity for staff to report concerns, complaints, or grievances.
2. CVUSD has a procedure for responding to reports of suspicious or inappropriate behaviors. It is CVUSD’s role to:
   • Respond to all reports of inappropriate or suspicious behavior
   • Designate an individual to respond to all reports
   • Investigate allegations of suspicious or inappropriate behavior
   • Contact Child Protective Services and or Law Enforcement as mandated by law
   • Provide staff with feedback and follow the progressive disciplinary procedure if necessary
   • Document the investigation and any necessary corrective actions
   • If appropriate, develop a corrective action plan to prevent a reoccurrence.
3. The District has a progressive discipline system regarding suspicious or inappropriate behaviors or policy violations, which might include:
   • Verbal warning
   • Written warning/Notice of unprofessional conduct
   • Disciplinary letter to Personnel File
   • Transfer or reassignment
• Administrative leave of absence or suspension with or without pay

4. Termination
   The District has a procedure for responding to allegations of abuse. It is the District’s role to:
   • Immediately respond to all abuse allegations
   • Ensure confidentiality to the fullest extent possible
   • Place the alleged perpetrator on administrative leave of absence, with pay, until the completion of the investigation
   • Inform the alleged perpetrator that he/she is not allowed to have contact with any student until the completion of the investigation
   • Protect the alleged victim from intimidation, retribution, or further abuse
   • Notify the proper authorities

5. The District systematically reviews incidents to assess the need for training or for revisions to policy and procedures.

6. CVUSD has a designated spokesperson(s) the Superintendent or designee to respond to media requests. All media correspondence should be directed to this individual. All personnel are required to know who this person is.

Extra-Curricular Activities and Field Trips
Extracurricular activities and field trips present unique risks for the safety of children. Large groups are difficult to monitor, and children 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 child. It is important to be aware of these risks and take measures to minimize them.

All extracurricular activities and field trips must be in compliance with CVUSD’s system-wide abuse prevention requirements. Additionally, all such activities must meet the following guidelines:

1. All extracurricular activities and field trips must be approved by the school’s principal.
2. All overnight extracurricular activities must be approved by the school’s principal.
3. Administrators should monitor school extracurricular activities and field trips when possible.
4. When transporting children, the following procedures must be observed:
   • Determine the number of staff necessary to adequately supervise students, (e.g., one staff to 10 children)
   • The bus driver should not be assigned as a supervisor for the children
   • Staff should be randomly seated throughout the bus for easier supervision
   • Children should be seated by age or grade as necessary
Before and After School Child Care

Before and after school child care can introduce risks of abuse. Children arrive in the morning and leave in the afternoon at different times. Many programs have open recreation during these periods, making it difficult to monitor activities. Parents are often in a hurry and may forget to sign out their child, or they may ask a friend or neighbor to pick their child up without notifying staff. These situations can be extremely risky.

All before and after school child care programs must be in compliance with CVUSD’s system-wide abuse prevention policy. Additionally, all such programming must meet the following guidelines:

1. Each program must maintain a written policy that states to whom a student may be released, and specifically what type of information or identification is required for someone other than parents to be allowed to pick up students.
2. Each program must strictly enforce site-specific sign-in and sign-out procedures.
3. Each program must establish supervision policies for when programs from multiple locations merge for special events, such as holidays. These policies should include guidelines for additional monitoring of mixed age groups.
4. Each program must provide parents with regular communication. Examples include:
   - Daily communication
   - Accident reports
   - Incident reports
   - Observations
5. Each program must establish policies for how to address late pick-ups or no-shows.

Code of Conduct: Staff and Volunteer Expectations

It is the desire of our District to provide the highest quality services available to our children. Our commitment as an organization is to create an environment for children that is safe, nurturing, empowering, and which promotes growth and success for the children who learn in our schools.

1. Children will be treated with respect at all times.
2. Children will be treated fairly regardless of race, gender, age, or religion.
3. Staff will not swear or tell offensive jokes.
4. Staff will not discuss with children their sexual encounters or in any way involve children in their personal problems or issues.
5. Staff will not use or be under the influence of alcohol or illegal drugs in the presence of children.
6. Staff will not have sexually oriented materials, including printed or internet pornography, in the presence of children.
7. Staff will not have secrets with children (except happy secrets like a surprise school celebration or event).
8. Staff will not stare or comment on a child’s body.
9. Staff will adhere to uniform standards of affection.
10. Staff will avoid displays of affection to children in private.
11. Staff shall not abuse children in anyway including the following:
   - Physical abuse: hitting, spanking, shaking, slapping, unnecessary restraints
   - Verbal abuse: degrading, threatening, cursing
   - Sexual abuse: inappropriate touch, exposing oneself, sexually oriented conversations
   - Mental abuse: shaming, humiliation, cruelty
   - Neglect: withholding food, water, shelter
13. Staff will report concerns or complaints about CVUSD staff or children to the School Principal, or Site Manager.
14. Staff members who work at CVUSD schools may not have engaged in or been convicted of child abuse, indecency with a child, or injury to a child.

**Acknowledgement of District Abuse Code of Conduct Abuse Policies and Cooperation of Investigation Procedures**

I have read the Code of Conduct and understand the items discussed. I understand that any violation of this Code of Conduct may result in discipline up to and including termination.

I have read and agree to comply with CVUSD policies regarding sexual abuse prevention.

When CVUSD investigates a complaint of misconduct (such as, but not limited to, child abuse or sexual harassment), it expects and requires the cooperation of all staff including the complainant, witnesses, and the accused offender. CVUSD may interview these individuals privately and take oral and/or written statements from them. Any staff member who fails to cooperate with such an investigation or to provide complete and truthful information may be subject to disciplinary action.

I agree to comply with CVUSD published policies and rules, including those related to reporting known or suspected abuse. If requested to do so, I will cooperate with any investigation of a possible violation of CVUSD policy and procedures by providing complete and truthful information in an oral and/or written statement.

I formally acknowledge that the above statements are true.