Sexual Molestation and Abuse Prevention Procedural Manual

Introduction
In early 2004, due to increasing awareness of the problem of child sexual abuse in our nation’s schools, 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 our Districts. This manual was created at the same time to provide quick and easy reference to these policies and to help you recognize high-risk situations before an incident of abuse occurs.

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

Overview of Procedures
Screening and Selection
Santa Paula Unified School District 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.
3. Thorough checks of at least three references, including standardized questions that assess risk for abuse.
4. Criminal background check through the Department of Justice (fingerprinting).
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. Santa Paula Unified School District 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 designated Santa Paula Unified School District personnel are required to complete the following training courses:

- Effects of sexual abuse
- Types of child molesters
- Characteristics of abusers
- How child molesters operate: access, privacy, control
- Identification and management of high-risk situations such as nap time, bathroom use, transition time, and free time
- 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**

Santa Paula Unified School 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 Santa Paula Unified School District personnel are required to sign the District’s Code of Conduct as a condition of employment.

2. **Physical Interactions**
   A policy that clearly defines appropriate and inappropriate physical interactions between staff and students protects all parties. Santa Paula Unified School District policies 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
• Allowing a child to cling to a staff leg
• 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 or body development

3. Verbal Interactions
   A policy that clearly defines appropriate and inappropriate verbal interaction between staff and students protects all parties. Santa Paula Unified School District policies 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
• Telling off-color or sexual jokes
• Shaming
• Belittling
• Making derogatory remarks
• Using harsh language that may frighten, threaten or humiliate children
• Making derogatory remarks about the child or about his/her family

4. **Discipline Practices**
   A policy that clearly defines inappropriate discipline practices protects all parties. Santa Paula Unified School District policies for inappropriate discipline practices are:

**Inappropriate Discipline Practices**

• Hitting
• Spanking
• Shaking
• Slapping
• Using physical exercise as a consequence
• Withholding food, light, or medical care
• Name calling
• Shoving
• Pulling hair or ears
• Biting
• Pinching
• Shaming
• Using derogatory remarks
• Ostracizing
• Using mechanical, tape, or rope restraints
• Punishing for toileting accidents

5. **One to One Situations**

Most abuse occurs when an adult is alone with a child. Santa Paula Unified School 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
- Inform other staff (i.e., administrators, other staff) that you are alone with one child
- Ask other staff to randomly drop in

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. Santa Paula Unified School District strongly discourages personnel from contacting students outside of regular school activities.

Under some circumstances, school personnel may find it beneficial to a student to spend time with him/her 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 in writing, with a copy of the notification supplied to the school administrator.
- School personnel are strongly discouraged at all times from spending time alone with a lone student.
- 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.
7. **Gift Giving**
Molesters routinely groom children by giving them gifts as a way to endear themselves to children. Sometimes they instruct the child to keep the gifts a secret; this then starts to teach the child to keep secrets between the molester and the child. For this reason, staff should only give gifts to children under the following circumstances:

- Administration must be made aware of and approve the gift
- Parents must be notified of the gift

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. Santa Paula Unified School 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 child. To ensure the safety of all involved, school personnel must adhere to the following practices:

- Staff must use the rule of three when transporting children in vehicles. At least two adults are required to transport a single child. At least two children must be present if transported by a single adult
- Children must never be transported without written permission from a parent
- Children should be transported directly to their destination. No unauthorized stops should be made
- Staff should avoid unnecessary physical contact with children while in vehicles
- Administrators must be informed when students are being transported by staff

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. Santa Paula Unified School 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 child for differential treatment
- Ridicule or humiliation
Monitoring and Supervision

Santa Paula Unified School 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. Santa Paula Unified School District has established the following policies to ensure that all District personnel understand their role in this process.

- **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.

- **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.

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

- **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 children who attend the school. Personnel should be aware of their school’s unique restroom guidelines, which should include:
    - Exceptions to the policy should only be extended for emergencies
    - Making note of students who abuse the exception
    - Instruct students on which bathroom to use
    - Do not permit children to linger in the bathroom
    - All staff, including security personnel, should routinely duck into bathrooms and announce their presence during passing periods and any time they travel throughout the school.

- **Unused or Limited Use Areas**
  High-risk areas in schools include restrooms, 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. Each school is responsible for designating which areas are off limits to students except when supervised. Personnel should be aware of their school’s policies regarding monitoring unused or limited use areas, which should include:

- The school keeps unused rooms locked;
- Classrooms, meeting rooms, and offices have windows that permit observation;
- Classroom windows should remain unobstructed;
- Restroom doors should remain open as long as privacy can be maintained;
- Students are prohibited from entering staff-only areas;
- The school requires that stage curtains remain open;
- If possible, school personnel use video surveillance equipment to monitor high-risk locations and for suspicious behaviors; and
- The school posts signs in high-risk areas stating that the areas are monitored.

**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. Santa Paula Unified School District has developed the following guidelines to encourage reporting, appropriately manage investigations, and standardize sanctioning for inappropriate behaviors.

1. Santa Paula Unified School District encourages staff to report suspected abuse or suspicious or inappropriate behaviors.
2. Santa Paula Unified School District has a procedure for responding to reports of suspicious or inappropriate behaviors. It is Santa Paula Unified School District’s role to:
   - Respond to all reports of inappropriate or suspicious behavior
   - Designate an individual to respond to all reports
   - Discuss suspicious or inappropriate behavior with the staff involved
   - Provide the staff with feedback and follow the progressive disciplinary procedure if necessary
   - Document the steps that were taken
   - Require that the results of the response are reviewed and approved by administration; and
   - If appropriate, develop a corrective action plan to prevent a reoccurrence
3. Santa Paula Unified School District has a progressive discipline system regarding suspicious or inappropriate behaviors or policy violations, which includes:
   - Verbal warning
   - Written warning/Notice of unprofessional conduct
• Reassignment
• Administrative leave of absence
• Suspension without pay
• Termination

4. Santa Paula Unified School 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 child until the completion of the investigation
• Protect the alleged victim from intimidation, retribution, or further abuse
• Notify the proper authorities

5. Santa Paula Unified School District systematically reviews incidents to assess the need for training or for revisions to policy and procedures.

6. The Superintendent or designee shall respond to media requests. All media correspondence should be directed through this individual. All personnel are required to know who this person is.

Extra-Curricular Activities and Field Trips
Extra-curricular activities and 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 extracurricular activities and field trips must be in compliance with Santa Paula Unified School District’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 Superintendent.
3. Administrators are expected to regularly and randomly observe school extracurricular activities and field trips.
4. Schools are required to provide parents with written information about extracurricular activities relevant to the detection and prevention of child abuse.

5. When transporting children, the following procedures must be observed:
   • Determine the number of staff necessary to adequately supervise children, (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
   • Students should be seated by age or grade

**Procedures for Volunteers**

Volunteers make invaluable contributions to our schools. They help teachers in the classroom, secretaries in the office, and students in the hallway. Volunteers can be part of the overall risk management effort when they know the rules and expectations of the school and the District.

**Volunteers Related to Students**

All volunteers that are directly related to students enrolled in Santa Paula Unified School District schools are required to:

   • Complete a Volunteer Registration Form
   • Sign a Code of Conduct
   • Sign Acknowledgement of Policy and Procedures
   • Remain in the line-of-sight of staff at all times when children are present
   • All volunteers on overnight activities must complete a criminal background check through the Department of Justice (fingerprinting).

**Volunteers Not Related to Students**

All volunteers with access to students but not directly related to children enrolled in Santa Paula Unified School District schools are required to:

   • Complete a Volunteer Registration Form
   • Sign a Code of Conduct
   • Sign Acknowledgement of Policies
   • Remain in the line-of-sight of staff at all times

**Code of Conduct: Staff and Volunteer Expectations**

It is the desire of Santa Paula Unified School District to provide the highest quality services available to our children. Our commitment as an organization is to create an environment for students that is safe, nurturing, empowering, and which promotes growth and success for the students who learn in our schools. Staff and volunteers are expected to follow these guidelines:
1. Students will be treated with respect at all times.
2. Students will be treated fairly regardless of race, sex, age, or religion.
3. Staff will not swear or tell off-color jokes.
4. Staff will not discuss with students their sexual encounters or in anyway involve students 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 students.
6. Staff will not have sexually oriented materials, including printed or internet pornography, in the presence of students.
7. Staff will not have secrets with students.
8. Staff will dress conservatively and avoid wearing provocative and revealing attire including midriffs, tank tops, halter tops, short shorts, or short skirts.
9. Staff will not stare or comment on a student's body.
10. Staff will adhere to uniform standards of affection.
11. Staff will avoid affection that cannot be observed.
12. Staff shall not abuse students 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

Any type of abuse will not be tolerated and may result in immediate dismissal from SPUSD. SPUSD will fully cooperate with authorities if allegations of abuse are made and investigated.

13. Staff will report concerns or complaints about Santa Paula Unified School District staff, or student to the Superintendent.
14. Staff and volunteers work at Santa Paula Unified School District may not have engaged in or been accused or convicted of child abuse, indecency with a child, or injury to a child.

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 my immediate dismissal.

I declare that I have not perpetrated physical abuse, sexual abuse, emotional abuse, or neglect against a student/child or any adult and that I have never been accused of these acts.

**Statement of Cooperation with Investigation Procedures**
When Santa Paula Unified School District investigates a compliant 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, and the accused offender. SPUSD 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 SPUSD 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 SPUSD policy and procedures by providing complete and truthful information in an oral and/or written statement.

**Acknowledgement of District Abuse Policies**

By clicking the button below, I formally acknowledge and agree to the following:

- I have not perpetrated physical abuse, sexual abuse, emotional abuse, or neglect against a child or an adult, nor have I ever been accused of these acts.
- I have read, understand, and agree to comply with Santa Paula Unified School District Code of Conduct. I understand that any violation of this Code of Conduct may result in my immediate dismissal.
- I have read, understand, and agree to comply with Santa Paula Unified School District policies and rules, including those regarding sexual abuse prevention and reporting known or suspected abuse. I understand that any violation of these policies may result in my immediate dismissal.
- I will cooperate with any investigation of a possible violation of policies and rules by providing complete and truthful information in an oral and/or written statement. I understand that refusal to cooperate with an investigation may result in my immediate dismissal.
- I understand that a record of my acknowledgement of these statements will be kept by Santa Paula Unified School District.

I formally acknowledge that the above statements are true.