



## Safety and Site Check Process

### Monitoring Employees and Volunteers at On-Site Programs

Cal Poly supervisors and administrators use scheduled and random observations of all programs, program locations and buildings; engage in spontaneous and scheduled conversations with employees, volunteers, and youths; conduct group and individual supervision and training meetings; and review program documentation, to ensure that safety standards are always in place.

**Keep a record.** Document your supervision visits. Include information like your arrival and departure times, which youths and parents/guardians were present, and a summary of the information collected. Provide employees and volunteers with feedback about visits.

**Vary your observation times.** Do not develop a predictable pattern of observation. Drop in at different times each day. Occasionally leave and come back immediately.

**Arrive before employees and volunteers.** Check punctuality and the routine that employees and volunteers follow to prepare for the youths to arrive.

**Survey the physical environment.** Is this a suitable location for the activity (e.g., size of area for number of youths, ability to supervise all areas used by youths, landscaping that may inhibit supervision)?

**Watch activities.** Are they planned and organized? Are the employees and volunteers actively involved? Ask to see the schedule of activities and compare with what is happening on at a given time.

**Observe bathroom and locker room activities.** Observe bathroom and locker room activities to ensure that the employees and volunteers are complying with the established policies and procedures.

#### Observe employees and volunteers' interaction with youth.

- Do employees and volunteers use the proper voice tone with youth?
- Do employees and volunteers give praise to youth?
- Do employees and volunteers follow the physical affection guidelines?
- Do employees and volunteers know the youth by first and last name?
- Do employees and volunteers sound enthusiastic?
- Do employees and volunteers set limits and boundaries with youth?
- Do employees and volunteers interact with all youth?
- Do employees and volunteers pay undue attention to any youth?
- Do employees and volunteers listen to the youth when they make reports or express concerns?

#### Observe employees and volunteers' interactions with each other.

- Do employees and volunteers pay more attention to the youths than to each other?
- Are employees and volunteers spread out and monitoring the entire facility?
- Do employees and volunteers know who is supervising which youths?
- Do employees and volunteers communicate to each other when one must leave the area?
- Do employees and volunteers use polite voice tones with one another?
- Do employees and volunteers share responsibilities around the program?

**Observe employees and volunteers’ interactions with parents/guardians.**

- Do employees and volunteers greet the parents/guardians?
- Do employees and volunteers know the parents/guardians by name?
- Do employees and volunteers provide adequate information to the parents/guardians?
- Do employees and volunteers ask the parents if they have any questions?
- Do employees and volunteers spend too much time with any specific parent/guardian?

**Ask parents/guardians questions, such as:**

- Are you satisfied with the care your child is receiving here?
- What can we do to make it better?
- Does your child ever say anything about his or her (title of employees and volunteers)?
- Have employees and volunteers ever contacted you or your child about anything other than the program?
- Do you ever have a chance to observe your child at the program?
- What does your child say about the time he/she spends here?

**Ask employees and volunteers how they would respond to “what if” situations that you describe, such as:**

- A youth is not picked up by a parent/guardian at the end of the program
- Another employee or volunteer shakes a youth for hitting another youth
- A parent/guardian confides in you that he/she thinks one of the employees or volunteers does not have appropriate boundaries with youth

**Adult-to-Youth Ratios**

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

	<b>Adult to Youth Minimum Ratios</b>	
<b>Age of Youth</b>	<b>Day Program</b>	<b>Overnight Program</b>
4-5	1:6	1:5
6-8	1:8	1:6
9-14	1:10	1:8
15-17	1:12	1:10

**Monitoring Guidelines for Youth Entering and Exiting**

Standard procedures for monitoring youth help the program identify who is present in programming and allow employees and volunteers to document when and with whom youth exit programming. Such procedures allow employees to quickly identify any youth who may be missing and decrease opportunities for youth to be left unsupervised. Guidelines for monitoring youth entry/exit from facilities or programming include:

- The program will have a procedure defining expectations for youth sign in/out of programming.
- When possible, create a single point of entry and exit in the facility or program.
- If there is more than one entrance or exit, ensure these other points of access are consistently monitored.
- Youth must check in with the front desk, or with the employee/volunteer they are meeting at the facility or program.
- Utilize headcounts or conduct attendance checks to ensure continuous awareness of which youth are in programming.

- Maintain written or electronic documentation of attendance in programming.

## Monitoring and Supervising Youth-to-Youth Interactions

Employees and volunteers must effectively monitor and supervise youth-to-youth interactions to prevent youth inappropriate behaviors and abuse. When supervising youths, it is important to remember that adult employee and volunteer behavior sets the tone, and youths should not determine what is and is not acceptable behavior.

### Employees and volunteers should ensure:

1. Youth interactions are age and developmentally appropriate.
2. Youths respect each other's boundaries.
3. Youths are not bullying, teasing, dominating, or displaying sexualized behaviors toward others.
4. Youths solve problems without fighting.

Employees and volunteers will utilize monitoring and supervision best practices such as line of sight supervision, zone monitoring and listening and observing for inappropriate behaviors between youths. Using these methods, employees and volunteers consistently monitor high-risk areas where sexual behavior between youths is most likely to occur including:

### For children and youth youths:

1. Naptime/Sleeping areas
  - Employees, volunteers, and youths should not sit or lie on anyone's bed or be in anyone else's sleeping bag.
  - Encourage youths to draw an imaginary line around their sleeping space and encourage them to report violations to an employee or volunteer.
  - Employees and volunteers will not leave youths alone during nap time.
  - Do not let youths share a sleeping mat, blanket, or sleeping bag.
  - Pay attention to who is sleeping next to whom.
  - Arrange sleeping areas with as much space as possible between each youth.
  - Do not let youths nap in areas not visible to employees and volunteers.
  - Keep the room sufficiently lit so that you can easily observe all youths.
2. Playgrounds/Recreational Spaces
  - If the space is too large or has obstructions, such as a building corner or a tool shed, limit the play area to where you can see.
  - If you are working with a colleague, make sure you each know the area or which youth you are watching.
  - Don't get distracted visiting with each other or looking at your phone.
  - Do not permit youths to play "Truth or Dare" or "Spin the Bottle."

### For youths of all ages (when possible):

1. Bathrooms and locker rooms
  - Require frequent supervision of youths in locker rooms. If visual supervision compromises youth privacy or is otherwise not feasible, ensure auditory supervision in/near the locker room.
  - Make it a point to walk through the locker room and let your presence be known, make noise, say hello, or sing a song.
  - Enter the locker room with youths or let them know you are standing outside the door waiting for them.
  - Limit the number of youths who enter to the same number of stalls or urinals.
  - Use the "Rule of Three," where you send three or more youths as a group. The youths stand outside the door while each youth uses the bathroom, one-at-a-time.
  - Require youths to ask permission prior to leaving program space to use the restroom (if age appropriate).
2. Secluded areas
  - Lock doors to unused or seldom used rooms and spaces.

- Use signage to deter youths from trying to access secluded areas.
- Ensure employees and volunteers frequently monitor secluded areas like stairwells and hallways.

**For adult youths:**

Adult youths (i.e., individuals with disabilities, those experiencing homelessness, or other adult participants in general programming) also require effective monitoring and supervision practices to prevent inappropriate youth-to-youth interactions. Employees and volunteers should provide line of sight supervision, structured or guided activities, designated or authorized program areas they may access, and observations of red flag or inappropriate behaviors to deter and intervene on inappropriate adult youth interactions.

## Monitoring Youth in Facilities

Youth under the age of 12 should not be alone in the facility without a parent/guardian present. After the age of 12, most youth have participated in activities without immediate parental/guardian supervision. In addition, most 12-year-old youth can use physical or verbal self-protection skills in the event that they are approached inappropriately by another youth or by an adult.

Each program is responsible for all youth in the facility, including vulnerable adults, and the specific needs for each population (youth, adolescents, teens, and vulnerable adults) vary. Although vulnerable adults may not need constant supervision, employees and volunteers should have some form of awareness and guidance as to where youth are and what activities they are engaged in. Many youth programs are compelled to permit younger children to access the facilities for many reasons. Therefore, implementation of the following practices is recommended:

1. Require a parent/guardian to complete a membership application which includes identifying information, any special medical or behavioral circumstances, any legal indemnifications, any applicable plan of support for the youth, the youth's date of birth, and emergency contact information. In addition, require all youths to sign-in AND to sign-out of the facilities so that the program has a record of the youths who are always in the facility.
2. Require youths to sign a Code of Conduct that outlines the program's behavioral expectations and policies regarding appropriate and inappropriate interactions. This Code of Conduct should also include a systematic disciplinary policy which explains that youths will be suspended or dismissed from the program for policy violations. Require parents/guardians to sign this Code of Conduct as well, so that they are aware of the program's policies and progressive disciplinary procedures. If the youth is a guest of a program member, the visiting youth must sign the Code of Conduct.
3. While Cal Poly understands that a parent/guardian orientation may not be feasible in all circumstances, we recommend encouraging parents/guardians to attend an information session with a program representative. This meeting will provide an opportunity to review program expectations and requirements, as well as any applicable plan of support the youth may have in place; it also provides an opportunity to establish a relationship with the parents/guardians. This can be helpful if any problems arise in the future.
4. While in the facilities, youths can be supervised directly, indirectly, or with a combination of the two techniques.
  - For direct supervision, the program may offer structured, scheduled activities like basketball tournaments, swimming activities, arts and crafts, etc. These activities should have one or more employees assigned to lead and supervise.
  - For indirect supervision, the program must designate certain building areas as authorized areas for youths. Authorized areas could include a gymnasium, a game area, or a classroom for doing homework and so on. Authorized areas must be easily visible and routinely and systematically checked by employees. Youths should know that they will be always supervised by employees, and all employees should know which areas are authorized and which are not.
5. Develop supervision best practices for the authorized areas. For example:

- Determine how frequently authorized areas should be monitored by employees.
  - Assign employee and volunteer-specific supervision responsibilities over authorized areas.
  - Require employees to record when they monitor authorized areas: this may be accomplished by using checklists.
6. All program employees should wear nametags or identifying clothing so that the youths can easily recognize them as employees.
  7. Train all employees:
    - To greet youths that enter the facility; to direct youths to the structured activities or authorized areas; and to redirect youths who are not in an authorized area or who are not participating in a structured activity.
    - To be aware that free and unstructured activities can include transitional times, such as waiting for transportation.
    - To be aware of the risks involved with mixing age groups and developmental levels and how to monitor activities involving mixed levels – including increasing supervision when necessary.
    - To routinely monitor high risk areas (such as bathrooms, locker rooms, and unused rooms). Cal Poly recommends designating specific employees to supervise these areas (i.e., Managers on Duty). These employees should document the scheduled and periodic sweeps of high-risk locations.

**Ultimately, youth must be always supervised, regardless of age or developmental level. The key is to remember that youth can be supervised directly in structured activities and indirectly when they are in authorized areas.**

## **Determining Program Fit for Unique Needs of Youth**

Certainly, every effort should be made to serve youths already participating in programs. However, not all programs can meet the needs of all youths. When the demands placed on employees and volunteers by specific youths exceed the skills of the employees and volunteers or the scope of the program, accidents or abuse may occur.

We understand each youth is different and responds differently in certain situations. Through behavior management, we will try preventing problems, using redirection, having clear rules, which are developmentally appropriate, and giving positive reinforcement.

Sample Questions for supervisors, employees, and volunteers to ask when deciding if a program fits a youth's unique needs:

- Can my employees and volunteers adequately supervise this specific youth without compromising the interactions with other youths?
- Has this youth previously posed a threat to others?
- Have we made a solid attempt to meet this youth's needs while ensuring the safety of others enrolled in the program?
- Does this youth pose a risk to the safety and well-being of others?

If supervisors and employees answer these questions and conclude the program is not the right program for a particular youth, schedule a meeting with the youth's parents/guardians, caseworker, etc. to discuss your conclusions. If possible, try to locate an alternative resource for the family

## Safety Plan Form

**This safety plan is designed for:**  
INSERT NAME

**Implementation Date:** INSERT DATE

**Review Date:** INSERT DATE

**Other youths on the unit or in the home:**

First Name	Gender	Age

**Brief history of youths:**

**History of behaviors:**

**Risk management strengths:**

**Risk Reduction Plans:**

<b>Risk Reduction Plan for Problem 1</b>	<b>Date of Implementation</b>	<b>Date of Review</b>	<b>Date of Review</b>
<b>Risk Reduction Plan for Problem 1</b>	<b>Date of Implementation</b>	<b>Date of Review</b>	<b>Date of Review</b>

**Purpose of the plan:**

**Evaluation of outcomes:**

**I have read and understand this safety plan:**

_____	_____	_____
<b>Parent /guardian</b>	<b>Youth</b>	<b>Supervisor</b>
_____	_____	_____
<b>Date</b>	<b>Date</b>	<b>Date</b>
_____	_____	_____
<b>Case Manager</b>	<b>Program Director</b>	<b>Clinical Director</b>
_____	_____	_____
<b>Date</b>	<b>Date</b>	<b>Date</b>

## Employee and Volunteer Cell Phone Use During Program Hours

Employees and volunteers may bring personal electronic communication devices to work but these devices must not be in view or in use when the individual is expected to be supervising youth. Program leadership may establish exceptions to this requirement include during approved breaks and/or emergency situations. Internet use, text messaging, and/or emailing youth is subject to the requirements defined in this organization's electronic communication and social media policy. Failure to adhere to the policy will result in progressive discipline.

### Acceptable Use of Cell Phones during Program Hours

There are occasions in which employees and youth will need to use official personal or organizational issued electronic communication devices. In these cases, employees and volunteers will have explicit direction from supervisors governing use. Situations which may require use of personal or organization-issued electronic communication devices include:

1. Field Trips
2. Off-site Programs
3. Emergencies

## Monitoring Mentoring Relationships

In addition to screening and training mentors, Cal Poly follows these supervision procedures:

- Requiring supervisors to contact mentors at least once a month to monitor progress, safety, check in about goals, and to provide support for mentors. Face-to-face meetings are required.
- Requiring supervisors to contact youth once a month and their families once a month. Face-to-face meetings are required.
- Requiring mentors to maintain a weekly log documenting all activity with the youth. This log is reviewed and signed by supervisors bi-monthly at a minimum.
- Requiring family members and youth to review and confirm records of contact and activities as reported by the mentor.
- Requiring supervisors to ask youth questions relevant to the detection of improper conduct or policy violations monthly.
- Requiring that a supervisor must interview the youth and interview the family to discuss the mentoring relationship at the end of a mentoring relationship. These interviews should include questions that assess abuse risk.
- Requiring that the organization provides community partners (schools, recreation centers, etc.) with information about what is appropriate and inappropriate in the mentoring program so that the community partners can assist in the monitoring of the match.

## Monitoring and Supervising Aquatic Programs

Aquatics programs are considered "high risk" as they can quickly provide opportunity for both adult-to-youth abuse as well as youth-to-youth abuse. Consider the following factors and how they play a role in your aquatics program:

- **Easy access to youths.** With many aquatics' programs, there are many youths in one shared space.
- **Lack of supervision.** Often, there is less parent/guardian supervision during these programs.
- **Public access.** Many aquatics program facilities do not require sign-in or out and it is relatively easy to drop into programming.
- **Partial nudity.** Employees and youths alike are partially clothed.
- **Ease of contact.** There is the possibility for inappropriate interactions in aquatic programs.
- **Perception of a relaxed environment.** Youths and adults may perceive there is less supervision and more opportunities for inappropriate behavior.

In order to ensure efficient monitoring and supervision of aquatics programs, and in addition to training our employees, our organization follows supervision procedures in the below areas:

- 1) Monitoring for suspicious or inappropriate behavior in the water



- 2) Monitoring locker rooms, changing areas, and bathrooms
- 3) Monitoring during swim lessons
- 4) Monitoring the pool deck and any lounge areas

1) Monitoring for Suspicious or Inappropriate Behavior in the Water:

It is important to watch for, and respond to, these red flag behaviors in adults:

- Violating your organization's policies regarding appropriate and inappropriate physical interactions with youths (for example, piggyback rides in the water, allowing youths to hang on them in the water, etc.)
- Loitering during youth-only lessons or activities
- Watching a youth or group of youths for an extended period
- Inappropriate sexual behavior and/or activity by an adult

It is important to watch for, and respond to, these red flag behaviors in youths:

- Seeking out unsupervised areas
- Inappropriate physical contact with other youths (i.e., horseplay, "chicken fights," and dunking)
- Youths who appear to be uncomfortable with attention they are receiving from an adult or another youth
- Inappropriate physical contact out of view (i.e. under water or in a slide)

2) Monitoring Locker Rooms, Changing Areas, and Bathrooms

*Refer to established organization policies and procedures for monitoring locker rooms, changing areas, and bathrooms.*

- Identify the unique high-risk areas of these locations in your organization that might be accessible for aquatics programs.
- Develop a schedule for consistent locker room, changing area, and bathroom monitoring which includes specific instructions for monitoring the high-risk areas. The schedule should appear to be "random" so that people in the locker room know that someone from the organizations could enter at any time.
- Create a system to ensure locker room checks are consistently completed.
- Train employees on how to recognize suspicious or inappropriate behavior in locker rooms, changing areas, and bathrooms, including:

Adults:

- Loitering in the locker room
- Watching/staring at youths in the locker room
- Making inappropriate comments to the youths in the locker room

Youth:

- Youth seeking out unsupervised areas
- Mixed age groups of youth
- Making inappropriate comments to other youth in locker rooms, changing areas, and bathrooms

3) Monitoring During Swim Lessons

- Ensure instructors teach swim lessons in open, viewable swim areas under the supervision of other employees.
- Monitor for interactions with youths that are following your organization's guidelines for appropriate and inappropriate physical interactions.
- Require instructors, when possible, to keep their hands above water and visible to others.
- Require instructors, when assisting a child during the lessons, to explain out loud where they will touch the child – "I am going to put my hand under your back to help you float."
- When possible, encourage parents/guardians to observe swim lessons.

4) Monitoring the pool deck and any lounge areas

- Ensure all entrances and exits to the pool deck are appropriately and regularly monitored.

- Designate specific employees responsible for monitoring the pool deck and lounge areas (other than lifeguards). Active supervision of these areas is always critical.
- Monitor youths to ensure they are following your organization's guidelines for appropriate interactions (including physical interactions, verbal interactions and electronic communications).
- Have a plan of action for responding to any deck changing (individuals changing on the pool deck and not in the appropriate locker room or changing area).

## Monitoring and Supervising Youth Sports Programs

To ensure safety and quality in the various youth sports programs, practices must be monitored and evaluated by a full-time employee who is familiar with policies and procedures.

**Keep a record.** Document your supervision visits. Include information like your arrival and departure times, which youth and parents/guardians were present, and a summary of the information collected. Provide employees with feedback about visits.

**Vary your observation times.** Do not develop a predictable pattern of observation. Drop in at different times each day. Occasionally leave and come back immediately.

**Arrive before employees.** Check punctuality and the routine that employees follow to prepare for the youth to arrive.

**Survey the physical environment.** Is this a suitable location for the activity (e.g. size of area for number of youths, ability to supervise all areas used by youth, landscaping that may inhibit supervision)?

**Watch activities.** Are they planned and organized? Are the employees actively involved? Ask to see the schedule of activities and compare with what is going on at a given time.

**Observe bathroom and locker room activities.** Observe bathroom and locker room activities to ensure that the employees are complying with the established policies and procedures.

### Observe employee interactions with youth.

- Do employees use the proper voice tone with youth?
- Do employees give praise to youth?
- Do employees follow the physical affection guidelines?
- Do employees know the youth by first and last name?
- Do employees sound enthusiastic?
- Do employees set limits and boundaries with youth?
- Do employees interact with all the youth?
- Do any employees pay undue attention to any youth?
- Do employees listen to the youth when they make reports or express concerns?
- Do employees exhibit inappropriate power dynamics with certain youth?
- Are employees aware of and actively supervising high-risk situations (i.e., mixed-age groups, off-site events, isolated areas)?
- Are employees prepared for and following organization procedures for transportation? Overnight trips? Large group activities? Free time?

### Observe employee interactions with each other.

- Do employees pay more attention to the youth than to each other?
- Are employees spread out and monitoring the entire facility?
- Do employees know who is supervising which youth?
- Do employees communicate to each other when one must leave the area?
- Do employees use polite voice tones with one another?
- Do employees share responsibilities around the program?

- Do employees have stress management methods that they implement appropriately?

**Observe employee interactions with parents/guardians.**

- Do employees greet the parents/guardians?
- Do employees know the parents/guardians by name?
- Do employees provide adequate information to the parents/guardians?
- Do employees ask the parents/guardians if they have any questions?
- Do employees spend too much time with any parent/guardian?

**Take youth aside (but stay within view) and ask them questions, such as:**

- How do you like coming here?
- What kinds of things do you do when you are here?
- Is the (title of employees) nice to you?
- Have you ever gotten hurt here?
- Has anyone ever been mean to you here?
- Do you feel that your coach treats you and all other youth fairly?

**Ask parents/guardian questions, such as:**

- Are you satisfied with the care your youth is receiving here?
- What can we do to make it better?
- Does your youth ever say anything about his or her (title of employees)?
- Have employees ever contacted you or your youth about anything other than the program?
- Do you ever have a chance to observe your youth at the program?
- What does your youth say about the time he/she spends here?

## Teen Leadership Programs

In order to most effectively serve our youths, our organization's staff and volunteers must be committed to maintaining a culture of safety. As an organization we want to encourage the professional development of teens who accept leadership positions in programming by providing ample learning opportunities and guidance on interacting with youth.

For purposes of this resource, Cal Poly uses the term "teen leaders" to refer to youth who take on leadership roles within a program but are still considered program participants and are not program volunteers or paid staff. Teen leaders may include but not be limited to counselors-in-training and leaders-in-training.

**1. Define the Teen Leadership Program.**

- i. What is the goal of the program?

*For example, is the program designed for older youth who desire to become camp counselors, or is it designed for youth too old for the program but who still want to participate?*

- ii. How does the program fit the mission of the organization?
- iii. What is/are the teen leader(s) role(s) and responsibilities in the program? Ensure it is clear that the teen leaders\* are NOT responsible for the direct supervision of youths.
- iv. What are the age requirements to participate in the teen leadership program?
- v. Who is responsible for supervising the teen program?

**2. Create specific policies for the teen leadership program.**

- Define age difference requirements between teen leaders and the youths they will be working with. Consider requiring at least a four-year gap in age between teen leaders and the youths they will be working with. For example, 16-year-old counselors-in-training can help with campers 12-years-old and younger.
- Outline appropriate and inappropriate physical, verbal, emotional, and behavioral boundaries between teen leaders and adult employees.
  - Define appropriate and inappropriate physical boundaries. Examples of appropriate physical interactions can include high-fives, fist bumps, and side hugs. Examples of inappropriate physical interactions can include full frontal hugs, back touches, and kisses.
  - Define appropriate and inappropriate verbal boundaries. Examples of appropriate verbal interactions can include appropriate jokes, strength-based conversations, and positive reinforcement. Examples of inappropriate verbal interactions can include oversharing personal history, harsh language, and compliments relating to physique.
- Outline appropriate and inappropriate physical, verbal, emotional, and behavioral boundaries between teen leaders and other youth.
  - Define appropriate and inappropriate physical boundaries. Examples of appropriate physical interactions can include high-fives, fist bumps, and side hugs. Examples of inappropriate physical interactions can include full frontal hugs, back touches, tickling, piggyback rides, lap sitting, kisses, and touching bottom, chest, or genital areas that is outside authorized and documented personal care assistance.
- Define appropriate and inappropriate verbal boundaries. Examples of appropriate verbal boundaries can include appropriate jokes, encouragement, and praise. Examples of inappropriate verbal interactions can include shaming, secrets, cursing, derogatory remarks about the youth or their family, and name-calling. Outline appropriate and inappropriate electronic communication between teen leaders and other youths.
  - Define appropriate and inappropriate communication between teen leaders and other youths that were friends, classmates or acquaintances prior to programming.
  - Provide information to teen leaders and youths about electronic communication best practices such as positive digital citizenship.
- Prohibit teen leaders from being one-on-one with other youth.
- For overnight programs (i.e. residential camp), define appropriate interactions during off hours for teen leaders, if they are allowed time away from the program:
  - Establish rules for teen leaders who may have off-time with adult employees.
  - Consider designating separate spaces for off time.
  - Define whether or not teen leaders can meet off-site during off hours.
- Contemplate outside contact rules for teen leaders and youths that govern things like dating, hanging out, going to the movies, etc. Avoid one-on-one interactions between adult employees and teen leaders:
  - If need arises for one-on-one meetings, define specific, pre-approved job duties, and require the meeting to be on-site or in a public space.
    - Require another individual be present where they can hear and view both individuals.
- Prohibit teen leaders from escorting youths to the bathrooms.
- Prohibit teen leaders from assisting youths with changing their clothes.
- Require teen leaders to wear clothing or lanyards that identify them as leaders-in-training and differentiate them both from employees and younger campers.
- Develop policies governing where teen leaders may spend their time off.
  - Establish rules for teen leaders having off time with adult employees.
    - For example, are teen leaders permitted to hang out in areas reserved for employees?
    - Can teen leaders go off-site? With adult employees?
    - Can they ride in vehicles together? With adult employees?

- Consider designating separate spaces for off time.
  - Define whether or not teen leaders can meet off-site during off hours.
3. **Create Screening Practices for the Teen Leadership Program.**  
The specific characteristics of your organization's teen leadership program and responsibilities given to teen leaders will guide the extent to which you need to implement a screening and selection process for teen leaders. The following are best practices for screening teen leaders:
- Require teen leaders to fill out an application.
  - Check references from the teens' parents/guardians, teachers, counselors, and/or coaches. Identify specific questions designed to assess for risk of abuse and ability to perform teen leadership responsibilities.
    - Sample Questions:
      - *How would you rate the applicant's ability to use good judgment in stressful conditions?*
      - *How would you rate the applicant's ability to maintain appropriate boundaries with youths?*
      - *We need a person who can be supportive and understanding of a youth's needs. How would you rate the applicant's ability to be genuinely supportive and understanding to a person in need?*
  - Interview the teen leaders. Identify specific behaviorally based interview questions to ask teen leaders to assess for potential abuse risk and ability to perform teen leadership responsibilities.
    - Sample Questions:
      - *Tell me about a time in your life when you had to quickly learn how to do something. What did you have to learn? How did you learn it? Did you use the new information?*
      - *Often in school or work, we're expected to adhere to policies that don't really make sense to us. Tell me about a time when you had to stick to a rule, even though it didn't seem reasonable. How did you handle that situation?*
  - Include the teens' parents/guardians in these interviews when possible.
  - If the applicant has been a youth participant, examine past behaviors by reviewing files and interviewing staff who worked with the youth.
4. **Train Teen Leaders.**
- Require teen leaders to attend trainings on the following topics:
    - Their role as a leader, including what they are and are not allowed to do.
    - The dynamic of being responsible for and supervising younger youth.
    - General abuse risk management, appropriate boundaries, self-protection, and preventing false allegations.
    - Preventing youth-to-youth sexual activity.
    - How to report concerns about themselves, other employees, or the campers in the program.
  - Train employees and supervisors in how to monitor teen leaders.
    - Address the dynamic of adults working with minor employees. Reference *Sample Guidelines for Working with Minor Employees* for considerations.
5. **Monitoring and Supervising Teen Leaders.**
- Designate a specific adult employee who is in charge of the teen leadership program and its participants.
  - Identify high-risk activities and high-risk areas and ensure teen leaders are not supervising these without the presence of an adult employee including:
    - Bathrooms/shower time
    - Transportation
    - Bedtime and changing time in cabins, etc.
    - Field trips/Off-site activities
      - during these activities an adult staff should be designated as head leader.

- Unused cabins/rooms – should be kept locked and an adult employee should be walking through these spaces regularly
- The program director should conduct daily check-ins with teen leaders and their supervisors.
  - Create a standardized form with questions that leadership fill out when conducting check-ins.
    - Include questions addressing morale, concerns, and professional development.
  - Consider requiring teen leaders to keep a log documenting their daily activities and any problems they encounter. The program supervisor should review these logs daily.

## **6. Responding**

- Minimize barriers to reporting for teen leaders and ensure they have the same methods of reporting as all adult employees.
  - Empower teen leaders to know how and who to report any concerns, allegations, or red flags.
- Develop a written procedure outlining the appropriate response to any red flag behavior or policy violations.
  - Require teen leaders to immediately report any red flag behavior or policy violations to their direct supervisor or through an anonymous method.
- Develop a written procedure outlining appropriate response to allegations or incidents of abuse, including how to respond if a youth discloses abuse.
  - Require teen leaders to immediately report any allegations or incidents of abuse to their direct supervisor or through an anonymous method.
  - Require teen leaders to report any allegations or incidents of abuse to the appropriate authorities in accordance with mandated reporting requirements.
- Develop a written procedure outlining the appropriate response to any youth sexualized behaviors.
  - Require Minor Employees to immediately report any youth sexualized behaviors to their direct supervisor.

## **Working with Minor Employees**

Our organization values the wellbeing of all our employees. We recognize there are specific considerations to acknowledge when working with minor employees; therefore, it is important to create policies and procedures which recognize these individuals as both minors and paid staff.

### **Policies**

- Healthy colleague relationships are important for a positive work environment. Although it is common to have friendships with colleagues, it is important to recognize certain types of interactions may not be appropriate when working with minor employees. Define appropriate and inappropriate physical and verbal interactions between adult employees and minor employees.
- Define appropriate and inappropriate electronic communication between adult employees and minor employees.
  - Define appropriate and inappropriate time and type of electronic communication.
  - Define appropriate and in inappropriate platforms for communication. For example, are adult employees allowed to communicate with or friend/follow minor employees on social media or exchange personal phone numbers?
  - Prohibit one-on-one electronic communication between adult employees and minor employees.
- Define appropriate and inappropriate interactions between adult employees and minor employees outside of work hours.

- For example, are adult employees and minor employees allowed to have lunch together off-site?
- For example, if employees are planning a cookout on a Saturday, are they allowed to invite minor employees?
- Can adult and minor employees ride together in a vehicle?
- Prohibit one-on-one interactions between adult employees and minor employees outside of activities or programming for the organization.
- Prohibit one-on-one interactions between adult employees and minor employees.
  - If the need arises for one-on-one meetings, require supervision, define specific, pre-approved job duties, and for it to be in a public area.
  - Require another individual be present where they can hear and view both individuals.
  - Require adult employee to document the nature of the conversation or task as required by the organization.

### **Monitoring and Supervision**

- Define appropriate supervision for adult employees working with minors. For example, define what level of supervision adult employees should be providing in high-risk activities (i.e., unstructured activities, bathroom breaks, swimming) and low risk activities (i.e., group time, structured activities). Supervisors of minor employees need to understand what level of supervision is required during different times/activities. There may be some activities that are higher risk (in camp setting: swimming in the lake) where minor employees would be aiding adult employees in supervision (unlike bathroom breaks) but there is a higher level of supervision needed from a supervisor or adult staff member. Identify to all adult employees who the direct supervisor is for all minor employees.
- Communicate with all adult employees about which job duties minor employees are prohibited from carrying out with youths. For example, monitoring shower time procedures or escorting youths to the bathroom.

## **Procedures for Supervising Playground and Recreational Activities**

Playgrounds and recreational activities can allow mixed age groups of youths to have access to one another and create increased opportunities for inappropriate interactions between youths. Employees and volunteers can become distracted by a youth who does not behave properly in less structured situations. They may get involved in conversations with each other or step away to tend to personal business, such as phone calls. Playgrounds may have blind spots or equipment which obstruct supervision.

To reduce risk, procedures for playgrounds and recreational activities require:

- Minimum employee/volunteer to youth ratios, which should mirror other activity ratios and consider:
  - age and number of youths present;
  - special or unique youth needs;
  - type of structures and equipment and the number of distinct activities occurring simultaneously;
- Size and configuration of playground/recreation area, i.e., barriers to supervision, whether physical boundaries like fences exist, geography and location, whether other outside groups will also be present. Definition of specific authorized areas and boundaries, including:
  - if and how outside groups can be cleared from activity areas during programming;
  - if outside groups or mixed ages are using facilities at the same time, delineate boundaries so that different groups do not intermix.
- Specific instructions on how to monitor barriers to supervision (such as storage sheds, playhouses, tunnels, and shrubs):
  - identify in advance any blind spots or equipment that obstruct line of sight supervision and designate them off limits or plan regular walk throughs of those areas;

- station employees and volunteers near playground equipment such as tunnels and slides in order to reduce the appearance of privacy.
- Employees and volunteers assigned to specific areas to supervise, i.e. zone monitoring:
  - ensures recreation supervisors are adequately spaced around the whole area;
  - they should continuously move within their assigned zone;
  - position them around the perimeter of the recreation area to ensure ample supervision and that youths remain in approved spaces.
- Active supervision:
  - employees and volunteers should position themselves to be able to see and hear all youths to whom they are assigned;
  - anticipate what youths will do and redirect when necessary;
  - listen and notice changes in sound or absence of sound;
  - remain engaged with youths rather than socializing with other employees or volunteers.
- Reviewing boundaries and rules with youths prior to the activity, including that they are to always remain in line of sight of employees and volunteers and how to report inappropriate behaviors.
- Specific bathroom procedures to be defined, ensuring there are enough recreation supervisors to always maintain ratios.
- Employees and volunteers periodically scan and conduct name to face roll calls for each age group and whenever moving from one activity or space to another.
- Prohibiting employees and volunteers using cell phones for personal business.
- Means of communicating with other recreation supervisors, including inside employees if possible, so they can get assistance when needed without exceeding ratios.
- An emergency plan for responding to incidents.
- Supervisors conduct periodic check-ins and assessments of the activity period and of the entire activity area.

## Managing Quiet Time and Naptime

Our organization has written procedures for managing quiet and nap times. Our employees know and follow these procedures, which at a minimum include:

- Employees, volunteers, and youths should not sit or lie on anyone's bed or be in anyone else's sleeping bag.
- Encourage youths to draw an imaginary line around their sleeping space and encourage them to report violations to an employee or volunteer.
- Employees and volunteers will not leave youths alone during nap time.
- Do not let youths share a sleeping mat, blanket, or sleeping bag.
- Pay attention to who is sleeping next to whom.
- Arrange sleeping areas with as much space as possible between each youth.
- Do not let youths nap in areas not visible to employees and volunteers.
- Keep the room sufficiently lit so that you can easily observe all youths.

## Facility Monitoring

Building architecture can increase or mitigate the risk of an incident or accident. Because most incidents of sexual behavior occur in private, the extent to which privacy is managed, risk is managed. The organization will systematically identify facility locations that allow for unnecessary privacy or limit line of sight supervision, and will implement a formalized system to manage these identified architectural risks, which includes;

- Ensuring employees and volunteers are aware of these locations and circumstances;
- Ensuring unused rooms, offices, and closets remain locked;
- Ensuring visibility in rooms without windows; and



- Ensuring employees routinely walk through out of the way locations.

## Facility Monitoring Checklist

Create a facility monitoring checklist for each location which identifies that location’s high-risk areas. Because most incidents of sexual abuse or inappropriate behavior occurs in private, minimizing privacy in facilities is critical to managing this risk. The checklists should be readily available, easy to follow and once completed, kept in a central location accessible to administrators.

In order to ensure that all of the locations are properly and consistently monitored, designate an employee or volunteer who must complete a site inspection checklist. On a daily basis, make sure that employees and volunteers complete this checklist multiple times throughout the day, and try to vary from day to day the actual times these checklists are completed. For example, if the facility monitoring checklist is completed at 10:00 AM, 2:00 PM, and 4:00 pm on Monday, schedule Tuesday’s checks to occur at 11:00 AM, 3:00 PM, and 5:00 PM.

Name/Title	Date	Time
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All unused rooms, offices, storage areas, and closets are locked. Stairwells are consistently monitored.

All windows permit observation into program areas and offices (i.e., artwork on windows should not prevent informal monitoring by passersby; all blinds on windows should be open).

All employees and volunteers are identifiable and dressed in the appropriate uniforms.

All program activities are within the designated ratios (insert your program ratios here).

Employees and volunteers are spread out in the activity area and actively supervising youths in authorized areas.

### Bathrooms

The bathroom is clean.

Neither youths nor adults are just “hanging out” in the bathrooms.

There is only as many youths in the bathroom as there are stalls.

All youths remain in authorized facility areas that are easily viewed by employees and volunteers (i.e., youths are not wandering off by themselves without employees and volunteers present to supervise them) or in structured, supervised program activities.

Youth are checked into and out of the facility according to policy.

The grounds around the location are free from hazards. Site Specific Considerations

For after-school sites that have theaters or stages (such as in a school cafeteria), stage curtains should always remain open so that youths cannot sneak behind the curtains.

For playgrounds, employees and volunteers should be positioned around the perimeter of the playground to ensure that youths are supervised and that they remain the assigned area. Employees and volunteers

should also be stationed near playground equipment (such as tunnels and jungle gyms) that do not allow for line-of-sight supervision.

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Supervisor/Manager on Duty Signature

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Date

## Monitoring Guidelines for One-Time Events

This organization provides the below as considerations for one-time on-site events:

Identification of Volunteers and Staff:

For event volunteers:

Volunteers should check in and receive “visitors” nametags or identifying clothing so that the youths, parents/guardians, and employees can easily recognize them as volunteers.

For employees:

Staff should wear appropriate identification while at event so youths, parent/guardians and volunteers can easily recognize them as employees.

Monitoring & Supervision of the Event and Facility:

- Limit entry and exit access points.
- To the extent possible, mark and/or lock off access areas.
- Make sure all unused rooms as well as closets, are locked during the event.
- Identify high risk areas in the facility that remain and create a list for monitoring throughout the event. For example, visible classrooms, stairwells, or other out of the way locations that are still accessible and could provide privacy. Create a simple checklist for documenting all monitoring.
- Consider assigning employees and volunteers to monitor specific areas.
  - Post at least one employee or volunteer near the bathrooms.
  - Assign at least one employees or volunteer to walk the parameter of the event periodically to ensure all participants stay within the designated areas.
  - Assign two employees and/or volunteers to walk identified high risk areas every 30 minutes. Document on checklist
  - Rotate employees and/or volunteers between bathrooms, event and high-risk area monitoring.

## Supervising Transition and Free Times for Employees and Volunteers

Transition time and free times can be the busiest part of programming at an organization. Youths rely on the practical supervision techniques of employees and volunteers to help keep youths safe as they move around. Below are sample procedures organizations can implement in their programs to ensure safeguarding is always at the forefront.

Transition time and free time procedures:

- Require youths to always remain in line of sight of employees and volunteers.
- Specify the employee-to-youth ratio.
- Specify narrow authorized areas in the program areas.
- Ensure that all employees and volunteers are assigned specific areas or groups to supervise (“zone monitoring”).
- Follow established organization bathroom policies and procedures.
- Require periodic attendance checks for each age group.
- Require supervisors to conduct periodic check-ins and sweeps of the entire activity area.
- Allow the use of a cell phone or two-way radio as an alternative form of communication to be used during an emergency

## Video Surveillance Equipment

Video cameras are a great documentation and verification tool. Installing cameras in common areas like hallways, outside of locker rooms and bathrooms, and in heavy-traffic areas can help promote a sense of

safety and security in your organization. If you receive a report, you can look back at your video footage to see exactly when something happened, where it happened, and if there are other people who saw something happen. If you receive an allegation, video footage can also be helpful for the authorities when they investigate incidents.

While video cameras can be highly useful documentation tools, they should not be a substitute for supervision in your programs. If your organization includes video cameras as part of your monitoring and supervision strategy, we recommend implementing the following best practices for using video cameras to assist you in monitoring and supervision:

- Require program supervisors and other staff to frequently walk through the facility to monitor staff, youths, and activities;
- Review camera footage regularly. Look for red flag behaviors, policy violations, inappropriate youth-to-youth interactions, and staff who are out of ratio;
- Ensure all individuals who review camera footage have completed training on how to review and utilize camera footage for monitoring; and
- Utilize camera footage to retroactively review actions rather than as a sole measure to prevent incidents from happening.

Periodically evaluate the placement of cameras to ensure they capture high-risk areas in the facility (such as hallways outside of bathrooms, secluded areas, stairwells, out of the way places, and other high-risk locations).

Further, ensure the following:

1. Position cameras to capture areas utilized by youths (except sensitive spaces like bathrooms, locker rooms, or changing areas). Employees and volunteers should stay within view of the cameras when interacting with youths.
2. Use footage for staff training on a variety of concepts. De-identify individuals on video if using for training purposes.
3. Footage may only be viewed by authorized individuals. Define who can review footage and under what circumstances.
4. Footage may not be removed from the facility.
5. Records should be stored as long as possible within the parameters of any legal requirements and/or the technological capabilities.