

**SEXUAL MOLESTATION
AND
ABUSE PREVENTION**

Procedural Manual



**CONEJO VALLEY UNIFIED
SCHOOL DISTRICT**

◆ 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.

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◆ Policy Overview – 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.

◆ Policy Overview – 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 on 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
- 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; and
- Review of current school cases

◆ Procedural Overview – Interactions and Conduct ◆

The CVUSD 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 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:



<i>Appropriate Physical Interactions</i>	<i>Inappropriate Physical Interactions</i>
<ul style="list-style-type: none"> • Side hugs; • Shoulder-to-shoulder or “temple” hugs; • Pats on the shoulder, back, or head; • Handshakes; • “High-fives” and hand slapping; • Verbal praise; • Pats on the head when culturally appropriate; • Touching hands, shoulders, and arms; • Arms around shoulders; and • Holding hands (with smaller children in escorting situations). 	<ul style="list-style-type: none"> • 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; • 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; and • Compliments that relate to physique or body development; • Sitting on teacher’s lap; • Carrying children • Meeting off campus with a student alone • No piggyback rides

◆ **Procedural Overview – Interactions and Conduct (continued)** ◆

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

<i>Appropriate Verbal Interactions</i>	<i>Inappropriate Verbal Interactions</i>
<ul style="list-style-type: none">• Positive reinforcement;• Appropriate jokes;• Encouragement; and• Praise.	<ul style="list-style-type: none">• 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 children; and• Making derogatory remarks about the child or about his/her family.• Personal texting, emails, or phone calls.

◆ **Procedural Overview – Interactions and Conduct (continued)** ◆

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

<i>Inappropriate Discipline Practices</i>	
<ul style="list-style-type: none">• Hitting;• Spanking;• Shaking;• Slapping;• Withholding food, light, or medical care;• Name calling;• Shoving;• Withholding bathroom privileges;• Public embarrassment;	<ul style="list-style-type: none">• Pulling hair or ears;• Biting;• Pinching;• Shaming;• Using derogatory remarks;• Ostracizing;• Using mechanical, tape, or rope restraints; and• Punishing for toileting accidents;• Allowing a student to discipline a student.

◆ Procedural Overview – Interactions and Conduct (continued) ◆

5. One to One Situations – Most abuse occurs when an adult is alone with a child. The CVUSD aims to 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 appropriate and/or possible, inform other staff (i.e., administrators) that you are alone with one child; and/or ask other staff to randomly drop in;
- Attempt to keep a physical barrier between you (e.g. desk).

6. Contact Outside of School Sponsored Activities – Many cases of organizational abuse occur off-site and outside of regularly scheduled school sponsored activities. Contacts outside of school sponsored activities may put students, staff, and the District at increased risk. CVUSD strongly discourages personnel from contacting students outside of regular school sponsored 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 should adhere to the following practices:

- Discuss the potential contact with a school administrator to confirm the appropriateness or necessity of the contact.
- In the case of ongoing contact outside of school sponsored activities, 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 single student, other than Special Education staff such as psychologist and therapists when conducting tests and evaluations.
- 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 may question students who spend time with school personnel outside of regularly scheduled school sponsored activities to determine the appropriateness and necessity of 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 avoid giving gifts to individual children, except in certain circumstances involving outstanding academic achievement or citizenship. In such cases the gifts should be given in public.
- 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. CVUSD strongly discourages personnel from transporting students outside of regular school sponsored activities, except in emergencies.

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:

- If practical, staff should use the “rule of three” when transporting children in vehicles. At least two adults should be present to transport a single child. If not practical, at least two children should be present if transported by a single adult.
 - Children must never be transported without written permission from a parent, except in emergencies.
 - Children should be transported directly to their destination. No unauthorized stops should be made.
 - Staff must avoid unnecessary physical contact with children while in vehicles.
- 9. Student-to-Student Interactions** – Most incidents of serious student-to-student abuse are preceded by more subtle incidents like name-calling, taunting, or roughhousing. Interrupting these interactions early, and establishing well-known standards of conduct, can keep the school environment safe. CVUSD 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.

◆ Procedural Overview - Monitoring and Supervision ◆



The CVUSD 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. CVUSD has established the following policies to ensure that all District personnel understand their role in this process.

1. **Administrative Visits** – Central Office 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 child abusing another child, the children are from different age groups. Each school is responsible for additional monitoring and supervision of programs that involve children from different 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 children who attend the school. Personnel should be aware of:
 - Students who frequently use restrooms during class time.
 - Students using restrooms other than appropriate grade level or gender assigned restrooms.
 - Children who linger in the restroom.

All staff, including security personnel, should routinely check 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 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:



- Keeping unused rooms locked.
- Providing classrooms, meeting rooms, and offices with windows that permit observation.
- Keeping classroom windows unobstructed.
- Keeping restroom doors open as long as privacy can be maintained.
- Prohibiting students from entering staff-only areas.
- Recommendation that stage curtains remain open whenever possible.
- If possible, using video surveillance equipment to monitor high-risk locations for suspicious behaviors.
- Post signs in high-risk areas stating that the areas are monitored.

◆ Policy Overview – 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. CVUSD has a progressive discipline system regarding suspicious or inappropriate behaviors or policy violations, which includes some or all of the following:
 - 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.
 - Termination.

◆ Policy Overview – Reporting and Responding (continued) ◆

4. CVUSD 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 or staff member involved in the case until the completion of the investigation.
 - Protect the alleged victim from intimidation, retribution, or further abuse.
 - Notify the proper authorities within the timelines mandated by law.
5. CVUSD 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 through 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 submitted to the Superintendent or designee. The Superintendent or designee shall review the request and make a recommendation to the Board as to whether the request should be approved by the Board.
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 or volunteers necessary to adequately supervise children, (e.g., one staff/volunteer 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 of children.
 - 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; and
 - Incident reports; and
 - Accident 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 CVUSD 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 anyway 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: degrade, threaten, curse; public humiliation

Sexual abuse: inappropriate touch, exposing oneself, sexually oriented conversations

Mental abuse: shaming, humiliation, cruelty

Neglect: withholding food, water, shelter

12. Staff will report concerns or complaints about CVUSD staff or children to the School Principal, or Site Manager.
13. 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.