

Definitions

Sexual abuse refers to coerced or forced sexual contact or activity that may be ongoing or occurs over time, often within a trusting relationship. Most victims know their perpetrators. Perpetrators are usually older than their victims and may trick or force them into gradually doing the sexual behavior. Perpetrators of ongoing sexual abuse control the child/youth through secrecy, shame, or threats. Children cannot consent to sexual contact with adults or older youth, and sexual contact is considered abuse, regardless of whether it includes touching or not.

Sexual assault usually refers to forced or unwanted sexual contact or activity that occurs as a single incident, as opposed to ongoing sexual abuse that may continue over time. It may also involve verbal or visual behaviors, or any type of pressure designed to coerce or force someone to join in the unwanted sexual contact or activity. The assault may involve a similar range of behaviors that are attempted or perpetrated against a victim’s will or when a victim cannot consent because of age, disability, or the influence of alcohol or drugs. Sexual assault may involve actual or threatened physical force, use of weapons, coercion, intimidation or pressure. The offender usually takes advantage of the victim’s vulnerability.

Employee Relationships with Students

The following expectations are to be met by all employees when working with students on- or off-campus.

1. Physical Interactions

<i>Appropriate Physical Interactions</i>	<i>Inappropriate Physical Interactions</i>
Side hugs; shoulder-to-shoulder 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 Holding hands with young students in escorting situations only	Full-frontal hugs Kisses Showing affection in isolated areas Employee sleeping in a bed with a child Allowing students to sit on employee’s knees Wrestling Piggyback rides Tickling Any type of massage given by or to a student Any form of affection that is unwanted by the student or the employee Compliments relating to physique or body development Touching bottom, chest, or genital areas

2. Verbal Interactions

Employees are prohibited from speaking to students in a way that is harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning, or humiliating. Employees must not initiate sexually oriented conversations with students or discuss their own sexual activities with or near students.

<i>Appropriate Verbal Interactions</i>	<i>Inappropriate Verbal Interactions</i>
Positive reinforcement Age appropriate jokes Encouragement Praise	Name-calling Discussing sexual encounters Involving students in the personal problems or issues of employees Secrets Cursing Off-color or sexual jokes, sexual innuendo Shaming Belittling Derogatory remarks Harsh language that may frighten, threaten or humiliate students Derogatory remarks about the student or his/her family

3. One-on-One Interactions

Most abuse occurs when an adult is alone with a student. The District seeks to eliminate or reduce these situations and employees are directed to avoid private one-on-one interactions unless approved in advance by the school administration.

4. Off-Campus Contact

Many cases of abuse occur off campus, after school, and during the summer. Contact outside of regularly scheduled activities may put school employees, students, and the District at increased risk. In particular, inviting or allowing students to be present in employees' homes creates an unacceptably high risk of liability.

<i>Appropriate Outside Contact</i>	<i>Inappropriate Outside Contact</i>
Taking groups of students on an outing, with normal field trip permissions in effect Attending sporting activities with a group of students, again with appropriate field trip permission forms Attending functions at a student's home, with parent present Home visits, with parents present	Taking any student on an outing without written permission from the parent/guardian. No one-on-one outings should ever be permitted Visiting one student in the student's home, without a parent present Entertaining a student or students in the home of a school employee A lone student spending the night with a school employee

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

- Supervisors should identify for employees what types of outside contact are appropriate and inappropriate.
- Ensure that employees have parent/guardian permission to engage in outside contact with the student and that school administrators are aware of the outside contact.

5. Electronic Communications

Electronic communications provide a venue for private communication between employees and students. The District stresses transparency in all electronic communications.

<i>Appropriate Electronic Communications</i>	<i>Inappropriate Electronic Communications</i>
<p>Sending and replying to messages from students on district approved platforms ONLY when copying in a supervisor and/or the student's parent</p> <p>Communicating through "group pages" on Facebook or other designated public forums. In no circumstances should an employee post any items on these public pages that would be seen as derogatory, or harassing. Employees who post on such sites should immediately contact their supervisor to report any inappropriate postings by students or employees.</p> <p>"Private" profiles for employees which students cannot access. However, employees should be aware that social media sites have been criticized for changing privacy settings to make it increasingly difficult to keep items private.</p>	<p>Harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning or humiliating comments</p> <p>Sexually oriented conversations</p> <p>Private messages between employees and students</p> <p>Posting inappropriate comments or pictures</p> <p>Posting pictures of students without consent of parents</p> <p>Use of unapproved communications platforms, including private social media and/or services that do not permanently store communication records.</p>

6. Gift Giving

Sexual offenders routinely groom youths by giving gifts, thereby endearing themselves to the youth. They might instruct the youth to keep the gifts a secret, which then starts teaching the youth to keep secrets from parents. For this reason, employees should refrain from giving gifts to students. Gift giving will only be allowed when the administration is made aware of and approve the gift, and parents are notified. Under no circumstances should an employee ever offer or provide alcohol, tobacco, or drugs to any student.

Supervision of School Programs

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

1. General Supervision

- a. Supervisors and administrators will regularly visit all school programs to ensure that activities are well-managed and that school policies are observed.
- b. Each program is responsible for establishing specific guidelines for additional monitoring and supervision of activities that involve students from different age groups. Close line-of-sight supervision is required when monitoring programs that mix age groups, especially at lunch time, recess and before/after school.

2. Facility Monitoring

Guidelines for Facility Monitoring

All unused rooms, storage areas, and closets must be kept locked at all times.

All unused buildings and areas are designated, posted, and enforced as off-limits to students.

All students are required to remain in facility areas that are easily viewed by employees.

Classrooms, meeting rooms, and any rooms where students have access should have windows that permit observation.

All facilities are required to utilize open doors, open blinds, and unobstructed windows (i.e., artwork on windows should not prevent informal monitoring by passersby).

Stage curtains should remain open.

Access to keys must be controlled for all facility areas.

3. Monitoring Higher Risk Activities

a. Bathroom Activities

Most abuse in schools occurs in bathrooms. Employees should be aware of their school's bathroom policies.

i. General Procedures

- 1) Instruct students which bathrooms to use.
- 2) Students who have histories of behavioral disruptions and/or sexual acting out behaviors should not be sent to the bathroom with other students, and should be escorted to the bathroom by an employee.
- 3) School employees and visitors must use staff-only bathrooms during the instructional day.

ii. Elementary School Procedures

- 1) When escorting a group of students to the bathroom, line the students up next to the bathroom and do not send in more students than the number of stalls and/or urinals. As one student comes out, send the next student in. Stand at the doorway and ensure students are coming out in a timely manner.
- 2) Encourage students to use the bathroom as a group during transition periods. However, sometimes students will need to use the bathroom during class time.
- 3) In classrooms with connected single-stall bathrooms, send one student at a time to the bathroom and keep track of when the student entered the bathroom and ensure their timely exit.

iii. Middle School Procedures

- 1) Employees should monitor bathrooms to ensure that students are not lingering in the bathroom.
- 2) When students need to use the bathroom during class time, require that they ask permission and teachers will keep track of when the student left and ensure their timely return.

b. Transition and Free Times (including before and after school)

Transition and free times, including those before and after school, pose a higher risk for incidents because during these times, employees may not be assigned a particular group of students to supervise. To decrease the risk of incidents, implement the following supervision guidelines:

- i. Designate certain areas at school as off-limits during these times by setting specific and narrow geographic boundaries in the program areas.
- ii. Depending on the age of students, ensure that employees are assigned specific areas to supervise during transition times and free times. Assign more employees to high-risk areas and activities (playgrounds, isolated areas, etc.). e.g., in schools with playground areas, assign employees to certain “zones” and around the perimeter of the area. If the playground includes play structures that limit line-of-sight supervision (such as tunnels, slides, or jungle gyms), assign employees to these areas as well. Employees should not be standing or sitting in groups while students play on the playground.
- iii. Create specific bathroom procedures during transition times and free times. Then, designate which bathrooms will be available to students. Employees should be posted at (or responsible for spot-checking) each available bathroom to actively monitor the students.
- iv. Require supervisors to conduct periodic sweeps of the entire activity area. If students are lingering outside of the planned activity area, the supervisor should encourage these students to return to the designated areas.
- v. Require the presence of school site supervisor during transition and free times (including before and after school).

c. Evening Events and Activities

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

- i. Apply the same procedures used to monitor transition and free times, as listed above.
- ii. Ensure that employees are assigned to supervise specific areas during both night games and the transition times before and after the events.

d. Transporting Students

Transporting students may increase the risk of abuse or false allegations of abuse because employees may be alone with a student or may make unauthorized stops with a student, e.g., to the employee's home. School employees must never transport students on field trips and extracurricular activities.

When transporting students by bus or van on field trips:

- i. Determine the number of employees necessary to adequately supervise the students (e.g., one employee to ten students).
- ii. The driver should not be assigned as a supervisor for the students.
- iii. Employees should be randomly seated throughout the bus for easier supervision of students, with at least one employee in the front of the bus and one in the far rear.
- iv. Take a head count or roll call before loading and after unloading vehicles.

When public transportation is used:

- i. Determine the number of employees necessary to adequately supervise students (eg., one employee to ten students).
- ii. Students should remain in one area of the vehicle, if possible.
- iii. Employees that are assigned to a group should remain with that group on the bus.
- iv. Take a head count or call roll immediately after entering and leaving the bus.

e. Day Trips, Field Trips, or Outings

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

All field trips or outings must be in compliance with the District's abuse prevention policies. Additionally, all such activities must meet the following guidelines:

- i. Obtain written prior approval by a supervisor.
- ii. Obtain written parental permission.
- iii. Set a ratio for employees-to-students. Require at least two unrelated adult employees.
- iv. Require that students are monitored at all times.
 - v. When using public bathrooms, employees should escort all students to the bathroom as a group. Employees should check the bathroom prior to the students going in to ensure other adults are not using the bathroom. If possible, employees should wait until other adults are no longer in the bathroom and then begin to send students in small groups. If it is not possible to wait for other adults to leave the

bathroom, employees should stand at the doorway and verbally check-in with the students to ensure that they are not lingering and to inform other adults that the students are being supervised.

vi. While supervising or assisting private activities, such as dressing or showering students, employees are never alone with a single student.

vii. Specific recommendations for parks, amusement parks, arcades, etc.

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

- Set boundaries at the location where they may and may not go. Then post employees around the boundaries and at the entrance and exit points.

- Assign remaining employees to monitor specific areas. Post at least one employee near the bathrooms. Employees should also be assigned to actively supervise the students.

- Chaperones must escort all students to the bathroom as a group, if possible. Employees should check the bathroom prior to the students going in, to ensure other adults are not inside. If possible, the chaperone should wait until other adults are no longer in the bathroom, and then send in small groups of students. The chaperone should then stand at the doorway and verbally check in with the students to ensure that they are not lingering, and to inform other adults that the students are being supervised.

f. Overnight Trips and Events

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

i. Supervision Guidelines

1) Goal for chaperone ratio is 1:12. Actual ratio may need to vary either upward or downward based upon individual trip factors upon approval by the principal.

2) Students are to be supervised at all times. They must be accompanied by a chaperone at all times that they are not in their rooms. However, the lead chaperone may designate limited times and areas in which students, on a buddy system basis of two or more students together, may walk around unaccompanied by a chaperone. In all such instances, the lead chaperone must ensure the following:

- Physical boundaries are clearly defined;

- Students check in at meeting points at a minimum of three hour intervals with no one dismissed until all have checked in safely;

- Students must stay within areas accessible to the general public;

- Students who are non-compliant lose privileges.

ii. Sleeping Arrangements

1) Overnight stays at private homes are prohibited.

2) For overnight stays in cabins or group rooms, adhere to the following procedures:

- Chaperones should be placed to maximize supervision around the cabin and in a way that decreases the chances of students sneaking out (such as by the door). No one adult should be in a cabin alone.

- Prohibit chaperones from changing in front of students.

- Prohibit chaperones from showering with students.

iii. Chaperone Guidelines

- 1) Chaperones are required to be active supervisors of the students and not passive observers.
- 2) All chaperones are to be on duty in the halls or cabins at night until after lights out and all rooms are quiet.
- 3) Chaperones are to regularly check rooms until after lights out.

Reporting Problems

It is imperative that every District employee participate actively in the protection of students. In the event that employees observe suspicious or inappropriate behaviors on the part of other employees, it is their personal responsibility to immediately report their observations.

1. Suspected Abuse by an Adult

a. Employee Response to Abuse

As required by mandated reporting laws, school employees must report any suspected abuse or neglect of a student—whether on or off school property or whether perpetrated by employees or others—to Child Protective Services and/or law enforcement.

b. Supervisor and Administrator Response to Abuse

In addition to the above response procedures, supervisors and administrators should ensure that the following steps are taken:

- Determine the immediate needs of the victim.
- Ensure that the incident has been reported to the proper authorities.
- Remove the accused from access to students.
- Review the file of the accused.
- Gather and document information surrounding the incident.
- Communicate with the authorities as to who will perform the internal investigation. When administrators contact the authorities, the authorities may advise the administrator to perform an internal investigation, or authorities may perform their own investigation. The school will decide how the internal investigation should be completed. If authorities request that the school takes no action, document the request and proceed in accordance with it. If authorities do not request that the school take no action, proceed with an internal investigation or call County Counsel to assist with the investigation.
- If abuse and/or violations of school policies are confirmed, follow the District's disciplinary procedures.
- Prepare a media response.
- Notify parents if appropriate.

2. Student-to-Student Sexual Abuse and Sexualized Behaviors

Most serious incidents of student-to-student abuse are preceded by more subtle incidents such as name-calling, taunting, or roughhousing. Interrupting these interactions early and establishing and

communicating standards of conduct can keep the school environment safe. The District recognizes that the following interactions are high risk and should be prohibited:

- Hazing
- Bullying
- Derogatory name-calling
- Games of Truth or Dare
- Ridicule or humiliation

a. Employee Response

In the event that an employee sees a student exhibit sexualized behaviors or suspects unlawful student-to-student sexual activity, the employee is instructed to do the following:

- Interrupt the behavior and separate the students. Do not investigate.
- Report the behavior to a supervisor or administrator.
- Document your report with factual information only.

Again, according to California Mandated Reporting Requirements, some instances of student-to-student sexualized behavior and abuse must be reported to authorities.

b. Supervisor or Administrator Response

In the event that a supervisor or administrator receives a report of a student's sexualized behavior or unlawful student-to-student sexual activity, the supervisor should do the following:

- Determine the appropriate administrator to conduct an internal review of the incident.
- Notify the parents of all students involved.
- Notify the authorities if required by mandated reporting laws.
- Document the incident and the school's response.
- Develop a written corrective action or follow-up plan in response to the incident.

c. Organizational Response

After the internal review of the sexualized behavior or unlawful student-to-student sexual activity, the District will determine what can be done to prevent a reoccurrence, such as:

- Review the need for additional supervision.
- Review the need for revised policies or procedures.
- Review the need for additional training.
- Alert others in the organization.