

Skyview School Inc.
Abuse Policies & Procedures

September 2021

I. General Definitions: Types of Abuse

1. Physical abuse is injury that is intentionally inflicted upon a student.
2. Sexual abuse is any contact of a sexual nature that occurs between a student and an adult or between two Students. This includes any activity which is meant to arouse or gratify the sexual desires of the adult or the other student.
3. Emotional abuse is mental or emotional injury to a student that results in an observable and material impairment in the student's growth, development, or psychological functioning.
4. Neglect is the failure to provide for a student's basic needs or the failure to protect a student from harm.

II. Code of Conduct with Students

The following policies are intended to assist Skyview School employees in making decisions about interactions with others, including students. For clarification of any guideline, or to inquire about behaviors not addressed here, contact the Director.

Skyview School is committed to creating an environment for students that is safe, nurturing, empowering, and that promotes growth and success. No form of abuse will be tolerated. All reports of suspicious or inappropriate behavior or allegation of abuse will be taken seriously. Skyview School will fully cooperate with authorities if allegations of abuse are made that require investigation.

The following outlines specific expectations of the employees as we strive to accomplish our mission together.

- Students will be treated with respect at all times.
- Students will be treated fairly regardless of race, sex, sexual orientation, gender identification, age, or religion.
- Employees will adhere to uniform standards of displaying affection as outlined by Skyview School.
- Employees will avoid affection with students and other employees that cannot be observed by others.
- Employees will adhere to uniform standards of appropriate and inappropriate verbal interactions as outlined by Skyview School.
- Employees will not stare at or comment on others' bodies.
- Employees will not date or become romantically involved with students.
- Employees will not use or be under the influence of alcohol or illegal drugs in the presence of students and other employees.
- Employees will not have sexually oriented materials, including printed or online pornography, on Skyview School's property.
- Employees will not have secrets with students and will only give gifts to students and/or other employees with prior permission.
- Employees will comply with Skyview School's policies regarding interactions with students and other employees outside of our programs.
- Employees will not engage in inappropriate electronic communication with students and other employees.
- Employees will not abuse students and other employees in anyway including (but not limited to) the following:
 - *Physical abuse*: hitting, spanking, shaking, slapping, unnecessary restraints
 - *Verbal abuse*: degrading, threatening, cursing
 - *Sexual abuse*: inappropriate touching, exposing oneself, sexually oriented conversations
 - *Mental abuse*: shaming, humiliation, cruelty
 - *Neglect*: withholding food, water, shelter

- Skyview School will not tolerate the mistreatment or abuse of a person by another person. In addition, Skyview School will not tolerate any behavior that is classified under the definition of bullying, and to the extent that such actions are disruptive, we will take steps needed to eliminate such behavior.
- Bullying is aggressive behavior that is intentional, is repeated over time, and involves an imbalance of power or strength. Bullying can take on various forms, including:
 1. *Physical bullying* – when one person engages in physical force against another person, such as by hitting, punching, pushing, kicking, pinching, or restraining another.
 2. *Verbal bullying* – when someone uses their words to hurt another, such as by belittling or calling another hurtful names.
 3. *Nonverbal or relational bullying* – when one person manipulates a relationship or desired relationship to harm another person. This includes social exclusion, friendship manipulation, or gossip. This type of bullying also includes intimidating another person by using gestures.
 4. *Cyberbullying* – the intentional and overt act of aggression toward another person by way of any technological tool, such as email, instant messages, text messages, digital pictures or images, or website postings (including blogs). Cyberbullying can involve:
 - Sending mean, vulgar, or threatening messages or images.
 - Posting sensitive, private information about another person.
 - Pretending to be someone else in order to make that person look bad.
 - Intentionally excluding someone from an online group.
 - Hazing – an activity expected of someone joining or participating in a group that humiliates, degrades, abuses, or endangers that person regardless of that person’s willingness to participate.
 - Sexualized bullying – when bullying involves behaviors that are sexual in nature. Examples of sexualized bullying behaviors include sexting, bullying that involves exposures of private body parts, and verbal bullying involving sexualized language or innuendos.
- Anyone who sees an act of bullying, and who then encourages it, is engaging in bullying.
- All employees must follow state specific mandatory reporting requirements. Employees will be trained to be aware of and understand their legal and ethical obligation to recognize and report suspicions of mistreatment and abuse. Employees will:
 1. Be familiar with the symptoms of child abuse and neglect, including physical, sexual, verbal, and emotional abuse.
 2. Know and follow Skyview School’s policies and procedures that protect students against abuse.
 3. Report suspected child abuse or neglect to the appropriate authorities as required by state mandated reporter laws.
 4. Follow up to ensure that appropriate action has been taken.
- Employees will report concerns or complaints about other employees, volunteers, adults, or students to Skyview School’s Director.
- Skyview School cooperates fully with the authorities to investigate all cases of alleged abuse. Any employee shall cooperate to the fullest extent possible in any external investigation by outside authorities or internal investigation conducted by Skyview School or persons given investigative authority by Skyview School. Failure to cooperate fully may be grounds for termination.
- Employees may not have engaged in or been accused or convicted of student abuse, indecency with a student, or injury to a student.

III. Policies

Policies define the bandwidth of acceptable behavior in an organization. Because offenders often violate policies to gain access to others, when employees know and understand policies, they can identify, interrupt, and report policy violations.

A. Physical Contact

Skyview School’s physical contact policy promotes a positive, nurturing environment while protecting students and employees. Skyview School encourages appropriate physical contact with others and prohibits inappropriate displays of physical contact. Any inappropriate physical contact by employees or volunteers towards others in Skyview’s programs will result in disciplinary action, up to and including termination of employment.

Skyview School’s policies for appropriate and inappropriate physical interactions include but are not limited to:

<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 or back • Handshakes • High-fives and hand slapping • Pats on the head when culturally appropriate • Touching hands, shoulders, and arms • Arms around shoulders • Holding hands (with young children in escorting situations) 	<ul style="list-style-type: none"> • Full-frontal hugs • Kisses • Showing affection in isolated areas or while one-on-one • Lap sitting • Piggyback rides, wrestling • Tickling • Allowing a student to cling to an employee’s or volunteer’s leg • Allowing students, older than kindergarten, to sit on an employee or volunteer’s lap • Any type of massage given by or to a student outside of accepted and documented medical treatment • Any form of affection that is unwanted by the student, employee, or volunteer • Touching bottom, chest, or genital areas that is outside authorized and documented personal care assistance

B. Verbal Interactions

Employees are prohibited from speaking to others in a way that is, or could be construed by any observer, as harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning, or humiliating. Employees must not initiate sexually oriented conversations with others. Employees are not permitted to discuss their own sexual activities with others.

Skyview School’s policies 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 	<ul style="list-style-type: none"> • Name-calling • Discussing sexual encounters or in any way involving others in the personal problems or issues of employees • Secrets

<ul style="list-style-type: none"> • Praise 	<ul style="list-style-type: none"> • Cursing • Off-color or sexual jokes • Shaming • Belittling • Derogatory remarks • Harsh language that may frighten, threaten or humiliate others • Derogatory remarks about a person or his/her family
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C. One-on-One Interactions

Most abuse occurs when an adult is alone with a student or other employee. Skyview School aims to eliminate or reduce these situations and prohibits private one-on-one interactions unless approved in advance by Skyview School's administration.

In those situations where one-on-one interactions are approved, employees should observe the following additional guidelines to manage the risk of abuse or false allegations of abuse:

<i>Additional Guidelines for One-on-One Interactions</i>
<ul style="list-style-type: none"> • When meeting one-on-one with a student or other employee, always do so in a public place where you are in full view of others. • Avoid physical affection that can be misinterpreted. Limit affection to pats on the shoulder, high-fives, and handshakes. • If meeting in a room or office, leave the door open or move to an area that can be easily observed by others passing by. • Document and immediately report any unusual incidents, including disclosures of abuse or maltreatment, behavior problems and how they were handled, injuries, or any interactions that might be misinterpreted.

D. Electronic Communication

[The terms "electronic communications" and "social media" or "social network" refer to activities that integrate technology, telecommunications, and social interaction using words, images, video, or audio tools. Examples include, but are not limited to social websites, blogs, message boards, wikis, podcasts, image- and video-sharing sites, text and voice chat platforms for gaming, live webcasting, and real-time web communities. Additionally, sending text messages between two or more mobile phones or fixed or portable devices over a phone or wireless network is included within these definitions.]

Skyview School strongly encourages employees to refrain from electronic communication and/or social media use with students. However, if these interactions are unavoidable, this organization offers the following guidelines:

All employees will adhere to the following CODE OF CONDUCT:

- Do not engage in behavior or comments that are, or could be construed by any observer to be, harsh, abusive, coercive, threatening, intimidating, shaming, derogatory, demeaning, or humiliating.
- Do not engage in personal attacks, sexually oriented conversations, or discussions about sexual activity.
- Be a positive role model by exhibiting professionalism in all interactions; portray an attitude of respect, loyalty, patience, courtesy, tact, and maturity.

- Only program-related messaging may be communicated electronically between employees and other employees, students, parents, and guardians. Such communication should generally occur during standard business hours.
- Employees are prohibited from sending private messages to students and other employees and/or replying to private messages a student. If a student attempts to privately communicate with an employee or volunteer electronically, the Director must be notified immediately.
- Personal social networking profiles and/or blogs of employees shall be private and not shared with students. Employees with profiles on social networking sites shall not request to be “friends” with or follow students or approve friend or follow requests from students.
- Never reveal sensitive or confidential information, including identifiable details or photos of a student without written consent from their parent or legal guardian.
- Employees may not post or share on their personal social media accounts any photographs or videos of students participating in school programs or events.
- Employees may not post or share inappropriate photos or comments on photos of students.
- Do not make pornography in any form available to students of Skyview School or assist students in any way in gaining access to pornography.
- Employees may not create web pages on behalf of Skyview School unless they have prior approval to do so and may not misrepresent their work with the Skyview School or the school itself.
- Skyview School encourages employees to set “office hours” outside of which employees may not generally send or respond to electronic communications. Employees should keep communications professional in nature and limit discussion to programmatic purposes.
- Skyview School will train employees on how to respond to private electronic communication from students and other employees. The responding procedure will include:
 1. Alerting the Director about the private communication and carefully documenting and forwarding the communication according to Skyview’s guidelines.
 2. Exceptions may be made under emergency situations wherein private messages may occur in order to locate a student and secure his/her safety, but all such contact must be documented accordingly.
 3. If a student or employee reveals abuse or inappropriate interactions with an adult or child, the employee or volunteer must report this information to the Director and child protective services
- Skyview School will provide employees and parents/guardians with information about how to respond to inappropriate communication from employees. The responding procedure should include:
 - Contact information for the program administration.
 - An anonymous method for reporting concerns.

This **Code of Conduct** and associated policies and procedures shall be provided to parents/guardians of students. It shall also be available on Skyview School’s website for public view. Parents/guardians may request in writing that a student not be contacted through any form of electronic communication or social media by an employee or volunteer of Skyview School.

E. Gift Giving

Molesters routinely groom children by giving gifts, thereby endearing themselves to the child. They might instruct the child to keep the gifts a secret, which then starts teaching the child to keep secrets from parents/guardians. For this reason, employees should only give gifts to groups of students, and only under the following circumstances:

1. Administration must be made aware of and approve the gift.
2. Parents/guardians must be notified.

IV. Monitoring and Supervision

When employees are adequately supervised, potential offenders are less likely to act on their impulses because they face detection. When students are adequately supervised, they too are less likely to engage in inappropriate interactions with others. Similarly, Skyview's campus must be monitored, particularly out-of-the-way locations or locations that might permit an offender undue access to or privacy with a student. Effective supervision and monitoring require that a variety of methods be used frequently, at both scheduled and random times.

A. 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. Skyview School 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 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.

B. Checking Members into a Facility:

1. When anyone (members, guests, residents, construction workers, maintenance, cleaning crews, etc.) enters the facility during operational hours, they must check in with the front desk.
2. Skyview School has a single point of entry. All other gates/access are locked.

C. General Supervision

General supervision procedures:

1. **Administrative Visits to Classrooms-** The Director will regularly visit all classrooms to ensure that all activities are well managed and that policies are observed by all in attendance. Ultimately, all students are supervised at all times, regardless of age.

2. Transportation Activities

Transporting students may increase the risk of abuse or false allegations of abuse. Skyview School does the following:

- a) Requires written parent/guardian permission from all students on the trip. Employees take these permission forms and medical releases with them on the trip.
- b) Requires employees to have a list of the students on the trip. The employees take roll before leaving campus, periodically throughout the trip, and then again when arriving back on campus.
- c) Specifies employees-to-student ratios.
- d) Prohibits drivers from making unauthorized stops.
- e) Require documentation of any unusual occurrences.

When public transportation is used:

- a) In addition to the transportation procedures listed above, students should remain in one area of the bus, if possible.

- b) Employees that are assigned to a group should remain with that group on the bus.
- c) Take a head count or call roll immediately after entering and leaving the bus.

In situations where employees transport students in non-organization vehicles:

- a) The Director must be notified of all transportation activities.
- b) Use the “rule of three” when transporting students: At least two adults must transport a single student, or at least two students must be present if transported by a single adult.
- c) Students must never be transported without written permission from a parent/guardian.
- d) Students must be transported directly to their destination. No unauthorized stops may be made.
- e) The employee must document beginning and ending times and mileage, the names of students, and other employees who are involved in transportation, purpose of the transportation, and destination.
- f) Employees must avoid unnecessary physical contact with students while in vehicles.
- g) When possible, employees should avoid engaging in sensitive conversations with students.

3. Off-Site Activities

The off-site procedures include:

- a) Requiring Director approval for all off-site activities.
- b) Requiring parent/guardian approval.
- c) Specifying employees-to-student ratios for the activity.
- d) Requiring employees and students to be easily identifiable.
- e) Including specific bathroom and locker room procedures as applicable to outing.
- f) Including transportation procedures.
- g) Considering specific recommendations based on the location and type of activity (for example, Amusement parks, Water Parks, Arcades, etc.).

4. Overnight Activities

Overnight stays present unique risks to students. 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.

Supervision Guidelines:

- a) All overnight activities must be documented and approved in writing by the Director.
- b) Administrators are expected to regularly and randomly observe overnight activities on a scheduled and periodic basis.
- c) The Director should appoint a “lead” employee to supervise the overnight. A meeting with all employees is conducted to discuss the unique risks of overnight trips, unique elements of the specific overnight trip and to review the specific policies and procedures.
- d) Provide parents/guardians with written information about the overnight activity. All parents/guardians must sign a permission slip for their students to attend the overnight.

Overnights at the Facility:

- a) Physical boundaries within Skyview School must be clearly defined and explained to the students.

- b) Assign each employee to a specific group of students to supervise. Each employee should then maintain a role sheet that lists all of the students in his or her group. Head counts and roll checks should be conducted routinely throughout the evening.
- c) Assign employees to high-risk areas in Skyview School’s facility, such as the bathrooms, entrances and exits, hallways, etc. If it is not possible to assign specific employees to these areas, assign specific employees to conduct periodic facility “walk-throughs”.
- d) With regards to sleeping arrangements, separate the male and female students into separate rooms and post employees at the entrances and exits to these rooms. If this is not feasible, separate males and females by as much space as possible.
- e) When performing room checks, employees should always go in pairs.

Overnights Away from the Facility:

- a) Overnight stays at private homes are prohibited unless approved by the administration.
- b) Physical boundaries at the off-site location must be clearly defined and explained to the students.
- c) Assign each employee to a specific group of students to supervise. Each employee should then maintain a role sheet that lists all of the students in his or her group. Head counts and roll checks should be conducted routinely throughout the event.
- d) If in a cabin type setting, the employees should be placed in bunks to maximize supervision around the cabin and in a way that decreases the chances of students sneaking out (such as by the door).
- e) In hotel rooms, assign students to rooms based on sex and age. Employees should have their own rooms. If employees must share rooms with students, they must have their own beds and never change in front of students.
- f) All employees are to be on duty in the halls or cabins at night until an hour after lights out and all rooms are quiet.

5. Program Quick Check

Offenders need three things to abuse: **access** to students, **privacy** with students, and **control** over students. This quick check is designed to help reduce an offender’s opportunity to gain access, privacy, and control in our program. It can also be used to identify situations where one student could be alone with another students.

Access

- I. Employees interacting with students are easily identifiable (ex. uniforms, badges, lanyards, etc.).

Yes: _____ No: _____

Notes: _____

- II. Employees are actively engaged with students and appropriately supervising them (ex. students remain in line of sight; employees are not on cell phones, etc.).

Yes: _____ No: _____

Notes: _____

- III. Where applicable, students remain within designated program areas.

Yes: _____ No: _____

Notes: _____

Privacy

- I. Employees, volunteers, and students interact in open and observable environments (ex. one-on-one situations are limited; classroom windows are not covered; unused rooms are locked; etc.).

Yes: _____ No: _____

Notes: _____

Control

- I. Employees maintain appropriate boundaries with students. (ex. employees give side hugs, use appropriate language, etc.). This applies to employees interacting with students as well as students interacting with other students.

Yes: _____ No: _____

Notes: _____

- II. Please provide any other observations (such as policy violations that concerned you). Please provide constructive feedback for this program.

Notes: _____

6. Supervisors and Administrators Monitoring On-Site and Off-Site Programs

Keep a record. Document your supervision visits. Include information like your arrival and departure times, which students 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 students to arrive.

Survey the physical environment. Is this a suitable location for the activity (e.g., size of area for number of students, ability to supervise all areas used by students, 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.

D. Abuse Risk Management Items for Job Descriptions and Performance Evaluations

Employees who directly supervise students will:

- Adhere to policies related to boundaries with Students.
- Attend required abuse risk management training.
- Adhere to procedures related to managing high-risk activities and supervising students.
- Report suspicious or inappropriate behaviors and policy violations.
- Follow mandated abuse reporting requirements.

Employees who do not directly supervise Students will:

- Adhere to policies related to boundaries with students.
- Attend required abuse risk management training.
- Report suspicious and inappropriate behaviors and policy violations.
- Follow mandated abuse reporting requirements.
- Adhere to job specific abuse risk management responsibilities.
 - Maintenance employees and volunteers—ensure unused rooms and closets remain locked; routinely monitor high-risk locations (locker-rooms and bathrooms), etc.
 - Front desk personnel—ensure students are properly signed in and signed out, ensures only authorized adults are allowed in the facility, etc.

The Director and other administrators will:

- Follow employee screening requirements and use screening instruments to screen for abuse risk.
- Provide employees with on-going supervision and training related to abuse risk.
- Provide employees with regular feedback regarding their boundaries with students.
- Require employees to adhere to policies and procedures related to abuse risk.
- Respond quickly to policy and procedure violations using Skyview School's progressive disciplinary procedures.
- Respond seriously and confidentially to reports of suspicious and inappropriate behaviors.
- Follow mandated reporting requirements.
- Communicate to all employees Skyview School's commitment to protect their students from abuse.
- Report essential abuse risk management information to the board of directors.

Performance Evaluations

Abuse Risk Management Items for Performance Evaluations:

- **Trainability:** Attends all required trainings. Able to comprehend and behaviorally incorporate new information and skills. Willing to utilize training and supervision to modify and improve performance. Keeps required training hours current.
- **Teaching:** Able to identify opportunities for teaching and to use these opportunities to help others develop and maintain new ideas and skills.
- **Team Interaction:** Able to communicate with others in a helpful manner while simultaneously building credibility and rapport. Able to accept the suggestions and feedback of others and provide suggestions and feedback in a manner that is conducive to success.
- **Policy Adherence:** Able to conform to established policies and procedures in all functions of job performance, both with clients and with colleagues.
- **Judgment:** Able to solve problems by considering all aspects of a situation. Able to balance the desires and needs of students with the concerns of parents. Consistently exhibits good decision-making and a realistic understanding of issues even when dealing with emotional or sensitive topics.

- **Spoken Communication:** Able to verbalize information clearly. Able to influence or persuade others in both positive and negative circumstances. Able to listen well and understand others. Able to communicate directly and appropriately with supervisors, co-workers, parents, and students.
- **Boundaries:** Able to establish rapport with Students without relinquishing the adult role. Able to separate personal needs and issues from those of the students in care.

VI. Responding

How an organization responds to suspicious or inappropriate interactions, policy violations, and incidents or allegations of abuse can dramatically affect the harm to the individuals involved and the damage to Skyview School. Once an employee, volunteer, student, or parent/guardian has expressed a concern or made an allegation about the treatment of a student, swift and determined action must be taken to reduce any subsequent risk to the student, to the accused employee or volunteer, and to Skyview School. Organizations must establish precise, unequivocal requirements for reporting to the authorities and for adhering to a serious-incident response plan.

A. Responding to Suspicious or Inappropriate Behaviors or Policy Violations

Because Skyview School is dedicated to maintaining zero tolerance for abuse, it is imperative that every employee actively participates in the protection of all students. In the event that employees observe any suspicious or inappropriate behaviors and/or policy violations on the part of other employees or volunteers, it is their personal responsibility to immediately report their observations.

Remember, at Skyview School, the policies apply to everyone.

Examples of Suspicious or Inappropriate Behaviors Between Employees/Volunteers and Students

- Violation of the abuse prevention policies described above
- Seeking private time or one-on-one time with students
- Buying gifts for individual students
- Making suggestive comments to students
- Picking favorites

All reports of suspicious or inappropriate behavior with students will be taken seriously. Our procedures will be carefully followed to ensure that the rights of all those involved are protected.

1. Employees and Volunteer Response:

If employees witness suspicious or inappropriate behaviors or policy violations from another employee or volunteer, the employee is instructed to do the following:

Guidelines for Employees/Volunteers Response to Suspicious or Inappropriate Behaviors and/or Policy Violations

- Interrupt the behavior.
- Report the behavior to a supervisor, director, or other authority.
- If you are not comfortable making the report directly, make it anonymously.
- If the report is about a supervisor or administrator, contact the next level of management.
- Document the report but do not conduct an investigation.
- Keep reporting until the appropriate action is taken.

2. Administrator Response:

In the event that an administrator receives a report of suspicious or inappropriate behaviors or policy violations from an employee or volunteer, the supervisor is instructed to do the following:

Guidelines for Supervisors and Administrators Response to Suspicious or Inappropriate Behaviors and/or Policy Violations

- Report to the next level of administration and determine the appropriate administrator to respond to the concern.
- Determine the appropriate response based on the report.
- Speak with the employees or volunteer who has been reported.
- Review the file of the employees or volunteer to determine if similar complaints were reported.
- Document the report on the appropriate form.
- If at any point in gathering information about a report of suspicious or inappropriate behavior, a concern arises about possible abuse, contact the state authorities and file a report.
- If appropriate, notify parents and/or guardians.
- Advise the person who reported the behavior that the report is being taken seriously.

Based on the information gathered, the following may be required:

- Increase monitoring or supervision of the employees, volunteer, or program.
- If policy violations with Students are confirmed, the employees or volunteer must be subject to disciplinary action up to and including termination and prosecution. Disciplinary action will follow the Progressive Disciplinary Process outlined in this manual.
- If more information is needed, interview and/or survey other employees or students.

3. Organizational Response:

Guidelines for Organizational Response

- Review the need for increased supervision.
- Review the need for revised policies or procedures.
- Review the need for additional training.

B. Responding to Suspected Abuse by an Adult

1. Employee/Volunteer Response to Abuse:

As required by mandated reporting laws, employees must report any suspected abuse or neglect of a student—whether on or off organization property or whether perpetrated by employees, volunteers, or others—to state authorities. Reports may be made confidentially or anonymously. A person who mistakenly reports suspected abuse is immune from civil or criminal liability as long as the report was made in good faith and without malice.

In addition to reporting to state authorities, employees are required to report any suspected or known abuse of students perpetrated by employees or volunteers directly to leadership so that immediate and proper steps may be taken to ensure the safety of alleged victims and others who may be at risk. Reports of suspected or known abuse may be made confidentially to the following:

- The Director
- Other Administrator

Additional Guidelines for Employees/Volunteer Response to Incidents or Allegations of Abuse

- If you witness abuse, interrupt the behavior immediately.

- If abuse is disclosed to you, assure the individual disclosing that he or she was correct to tell you.
- Protect the alleged victim from intimidation, retribution, or further abuse.
- Immediately report the allegation or incident to the proper organization authorities (based on mandatory reporting requirements) and the designated authority.
- Be sure to document the incident, disclosure, or any circumstances causing your suspicion of abuse. State only the facts.
- It is not your job to investigate the incident, but it **IS** your job to report the incident to your supervisor in a timely manner.
- Check back to make sure appropriate steps were taken. If not, report again to your supervisor or the designated organization authority.

2. Supervisors and Administrators Response to Abuse:

In addition to the above response procedures, supervisors and administrators should ensure the following:

- Guidelines for Supervisor and Administrators Responding to Allegations or Incidents of Abuse*
- First, determine if the student is still in danger and if so, take immediate steps to prevent any further harm.
 - Gather as much information about the allegation as you can. For example, who made the report, who was allegedly abused, who was the alleged abuser, what was the nature of the alleged abuse, where and when did the alleged abuse occur, etc.
 - Accurately record everything you learn in as much detail as you can. Remember your notes may be read by others. Stick to the facts.
 - Contact the appropriate local authorities as indicated by your mandatory reporting procedures. Make sure you get a case number and the name and contact information of the person with whom you speak at the reporting agency.
 - If the alleged abuse involves an employee or volunteer, notify your crisis management team and follow your crisis management plan.
 - Suspend the accused employees or volunteer until the investigation is completed.

C. Responding to Student-to-Student Sexual Abuse and Sexualized Behaviors

The thought that one student may sexually abuse another student does not occur to many people. Unfortunately, abuse between peers has increased 300% in the past few years. Student-to-student sexual activity and sexualized behaviors often remain unreported in organizations because employees are not comfortable documenting these situations or may not know how.

1. Student-to-Student Interactions:

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 program environment safe. Skyview School recognizes that the following interactions are high risk and should be prohibited:

- Prohibited Student-to-Student Interactions*
- Hazing
 - Bullying
 - Derogatory name-calling
 - Games of Truth or Dare

- Singling out one child for different treatment
- Ridicule or humiliation

In order to adequately respond to and track incidents within Skyview School, all sexual activity between students and sexualized behaviors of students must be consistently documented.

2. Employees and Volunteer Response:

Student-to-student sexual behaviors can include inappropriate touching, exposing body parts, using sexualized language, making threats of sexual activity, engaging in sexual activity, and similar types of interactions.

If employees witness student-to-student sexual behaviors, they are instructed to follow these guidelines:

Guidelines for Employees Responding to Student-to-Student Sexual Activity

- If you observe sexual activity between students, you should immediately separate them.
- Calmly explain that such interactions are not permitted and separate the students.
- Notify your supervisor.
- Complete the necessary paperwork including what you observed and how you responded.
- Follow your supervisor's instructions regarding notifying the authorities and informing the parents/guardians of the student involved.
- In some cases, if the problem is recurring discipline may be required including not allowing one or both Students to return to the program.

3. Supervisors and Administrators Response:

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

Guidelines for Supervisors and Administrators Responding to Student-to-Student Sexual Activity

- Meet with the employees who reported the sexual activity to gather information.
- Confirm that the students involved have been separated or placed under increased supervision.
- Review the steps taken by the employees on duty.
- Review the incident report to confirm it is accurately and thoroughly completed.
- Meet with parents/guardians of the students involved.
- Determine what actions should be taken to make sure there is no recurrence, including assessing the suitability of the program for the children involved.
- Notify the proper authorities.
- Develop a written corrective action or follow-up plan in response to the incident

Based on the information gathered, the following may be required:

- Review the need for additional supervision
- Review the need for revised policies or procedures

- Review the need for additional training
- Alert others in Skyview School

4. **Organizational Response:**

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

Guidelines for Organizational Response

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

VII. Administrative Practices

A. Critical Incident Management Plan Prior to Allegation/Incident

- Determine who from Skyview School will be on the Critical Incident Management Team.
- Educate all employees on what to do if someone alleges current or historical abuse involving an school community member, employee or volunteer.
- All employees should know how to fulfill their duties as mandated reporters (if they are mandated reporters according to state law).
- All employees should be trained on how to complete the appropriate critical incident forms for Skyview School.

Immediate Safety

- Follow all mandated reporting requirements and contact the authorities as appropriate.
- Where applicable, prevent the accused from having further access to children until a thorough incident review is completed. Before beginning an internal incident review, verify with local authorities that this will not interfere with their investigation.
- If the accused person is an employee, follow progressive discipline procedures accordingly. This may involve suspending the accused during the investigation.
- When applicable, notify other employees.

Initial Communication Plan

- Designate a point person to respond to all inquiries from parents, the media, and other stakeholders.
- Prepare a short media statement in advance of getting a media inquiry.
- All oral and written communication should speak with a voice of compassion and confidence.
- All employees and volunteers should know how to refer media inquiries to the appropriate person.
- As soon as possible, meet in person (not over the phone) with identified victims and their parents/guardians.
- Reassure them that you are taking this seriously.
- Find out what response they expect and be prepared to explain support you will offer, such as counseling.
- Consider reaching out in writing to parents/guardians of all children currently attending Skyview School as well as those with past contact with the accused offender.
- The message should communicate:
 - **Empathy:** Begin by stating that such incidents run counter to Skyview School's values.
 - **Facts:** Include a summary of the incident, including information about the arrest, suspension, investigation, etc.
 - **Contact Request.** Ask parents to contact you or the specified authorities if they suspect their child may have been abused.
 - **Your Response:** Explain that you are fully cooperating with the authorities. Describe proactive steps you are taking such as offering resources to parents, hosting a parent meeting, training employees, and conducting an independent investigation to learn from this incident so you can prevent it from happening again.
- Host a parent/guardian meeting to speak directly with concerned families and directly answer any questions before rumors or misinformation is spread.
- Communicate as much information as you can about the incident.
- Provide information regarding the proactive steps leadership is taking in response to the incident.
- Describe resources you are providing families and give parents a chance to ask questions.
- Provide parents with information about how to talk to their children about abuse.

Ongoing Communication and Response

- Determine how to manage ongoing relations with authorities, parents, the community, and media.
- Consider adding a page to your website with updated details about the incident.
- Designate specific individuals in your organization to handle various communications and outreach efforts.

Promote Prevention at All Levels of Skyview School

- Educate parents on abuse prevention. Offer a workshop during which parents can learn how to protect their children from abuse. This is an educational session that is different from the parent meeting described above.
- Provide a student education program to all Students involved with Skyview School on how to protect themselves from abuse and how to express concerns.
- Train re-train all employees on how to identify and report “red-flag” behaviors that do not rise to the level of suspected abuse. This is an important part of the overall response and ongoing prevention effort.