# ACCREDITATION STANDARDS<sup>©</sup>

Overview For Consumer-Serving Organizations

Our mission is to help you protect those in your care from abuse and help you preserve trust in your organization.

# PRAESIDIUM

# Foreword

Over three decades ago after a tragic incident of sexual abuse at a youth-serving organization left a community devastated and board members demanding answers, Praesidium was established. From this first

organizational partnership three decades ago, Praesidium has since analyzed thousands of cases of abuse, the scientific literature, partnered with outside experts and researchers, and worked with organizations across industries throughout the world to help them prevent, assess, and respond to sexual abuse of youth and vulnerable adults.

Abuse within organizations often spurs a series of questions about how and why something occurred, while searching for missed signs and opportunities. Despite prevailing myths, organizational sexual abuse rarely manifests simply as one bad actor who infiltrates and preys upon vulnerable consumers. Although research and experience tell us there is no one-time or quick fix, sexual abuse within organizations is a preventable risk.<sup>1</sup>

#### THE PRAESIDIUM SAFETY EQUATION® Screening Training **Policies** and Selection Internal Monitoring Consumer and Feedback **Participation** Supervision Systems Administrative A SAFE Responding **Practices ENVIRONMENT**

Prevention requires a robust, systems-based approach and a sustained commitment anchored in empirically based best-practice standards. To better understand these concepts requires a broader and deeper look at an organization's systems and the surrounding culture.

Root cause analysis (RCA) is a well-respected and widely used process designed to identify how a serious and complex incident (like a fall from construction scaffolding or death in an operating room) occurred or could be prevented.<sup>2</sup> Although there is a range of RCA methods, one involves pushing the question of why to peel away the layers of symptoms to ultimately reveal the root cause of the problem and a prevention pathway.

For decades, Praesidium has used this methodology to determine root-cause contributors in thousands of cases of organizational abuse. Our ever-growing RCA data consistently indicates the root cause of abuse clusters into one or more of eight organizational operations:

#### **POLICIES**

Policies define the bandwidth of acceptable behavior in an organization. When employees know and understand policies, they can report policy violations that may foretell abuse.

#### **SCREENING AND SELECTION**

Comprehensive screening and selection requires organizations to discover and consider everything they can about applicants, and to use what is known about how offenders operate to make thoughtful hiring decisions.

#### **TRAINING**

Effective abuse prevention training gives employees and volunteers the information and skills they need to keep those in their care safe. Training must be frequent, specific, and immediately useful on the job.

#### MONITORING AND SUPERVISION

When employees and volunteers are adequately supervised, potential offenders are less likely to act on their impulses because they face detection.

#### **INTERNAL FEEDBACK SYSTEMS**

Information about program operations, such as incident reports, client complaints, or external licensing violations, can identify high-risk programs or individuals.

#### **CONSUMER PARTICIPATION**

If consumers—adults and minors alike—know how to recognize suspicious or inappropriate interactions or policy violations, they can be a valuable part of the risk management team.

#### RESPONDING

How an organization responds to reports of suspicious or inappropriate interactions, policy violations, or suspected abuse can dramatically affect the harm to the individual and to the organization.

#### **ADMINISTRATIVE PRACTICES**

The board of directors must be well-informed of the risks the organization embraces and the operational practices in place to ensure the safety of those in care and the reputation of the organization.

Sexual abuse remains a serious issue that affects millions of vulnerable individuals each year, sparing no generation or demographic.<sup>2</sup> Expectations from stakeholders have never been higher. Now more than ever communities, regulators, insurance carriers, and funders are asking important questions and driving long-overdue action. As a global community, every organization has an obligation to safeguard its consumers and the teams providing unparalleled programming and outreach.

Given the breadth and depth of our standards, Praesidium Accreditation® allows your organization to publicly demonstrate a commitment to safety and adherence to the highest standards in abuse prevention.

Whether you are strengthening foundations or ready to begin the accreditation journey, know the protection efforts you take today will impact the generations of tomorrow. We look forward to helping you prevent abuse and create a culture of safety.

With Sincere Appreciation,

Aaron Lundberg CEO. Praesidium

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# Praesidium Accreditation Standards

The Praesidium Standards are informed by thousands of root cause analyses, continuous scientific research, and over three decades of field experience with more than 4,000 organizations that serve children, youths, and vulnerable persons. Anchored by the Safety Equation, these standards provide a framework to help organizations focus their efforts where we know it makes the greatest impact.

There are a total of 23 standards and these standards are designed for any consumer-serving organization. Each standard has components that need to be implemented to meet the standard. Components fall in one of four categories:



#### **CRITICAL CORE:**

This component is required for Accreditation and applies to <u>all</u> organizations.



#### **CRITICAL, NON-CORE:**

This component is required for Accreditation *only for those organizations* to whom it may apply. Praesidium will determine its applicability for an organization.



#### **NON-CRITICAL CORE:**

This component is not required for Accreditation but *may be necessary* for score improvement. *It applies to all organizations.* 



#### **NON-CRITICAL, NON-CORE:**

This component is not required for Accreditation but *may* be necessary for score improvement only for those organizations to whom it may apply. Praesidium will determine its applicability for an organization.

This document serves as an introduction to the Praesidium Accreditation Standards and includes research-based rationales for each Standard.

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# POLICIES

Policies define the bandwidth of acceptable behavior in an organization. When employees and volunteers know and understand policies, they can report policy violations that may foretell abuse.



#### **STANDARD 1:**

The organization's policies communicate zero tolerance for abuse.

#### Research Behind the Standard:

An organization's culture is the sum of its attitudes, values, norms, beliefs, history, personalities, and ethics of its employees and volunteers.<sup>3</sup> Experts agree that consumer safety should be embedded in all facets of institutional leadership, governance, and culture.<sup>4</sup> "There is ample evidence that persons predisposed to abuse seek to join organizations where opportunities are prevalent and, once they have gained entry to an organization, attempt to redesign the organization to maximize these opportunities."<sup>5</sup>

- Organizations should emphasize abuse prevention within their organizational policies to send a very clear message: consumers in this organization are off-limits to sexual abusers.<sup>6,7</sup>
- Organizations should emphasize a zero-tolerance for any form of abuse of its consumers and should clearly communicate that all sexual interactions with consumers are prohibited.<sup>8</sup>
- Employees and volunteers should be educated about the organization's specific abuse prevention policies to help communicate a zero-tolerance environment regarding abuse.<sup>9</sup>
- Employees and volunteers should be required to sign a document that describes the organization's commitment to protecting consumers and its expectation that all employees and volunteers will abide by this policy.<sup>10</sup>



#### **STANDARD 2:**

The organization's policies define appropriate interactions with consumers.

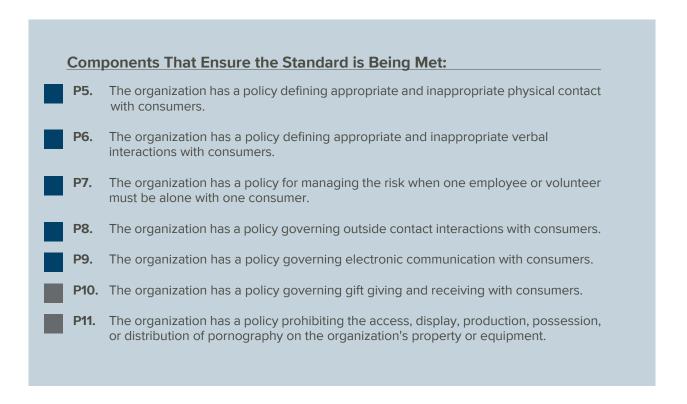
#### Research Behind the Standard:

Consumer serving organizations rely on a mix of employees and volunteers to mentor, guide, and otherwise structure activities and interactions. The relationships between employees or volunteers and the consumers they serve have been recognized as a key component of an organization's success. However, these relationships can be exploited. Perpetrators often use various strategies to gain trust so that they will have greater opportunities to abuse. Explicit policies are essential, because, "without clarity, a person is more or less left to their own devices to make judgments about things that can be very complex." Lack of certainty surrounding what behaviors are abusive is one of the primary barriers to disclosing abuse, for both victims and bystanders. Once explicit policies involving interactions between individuals are established and understood by all members, the organization will be better equipped to monitor and respond to inappropriate behavior and breaches of policy, as well as suspicions and allegations of abuse.

- Organizations should encourage positive and appropriate interactions while discouraging inappropriate interactions.
- Inappropriate and harmful behaviors that are likely to occur should be identified within each organization and explicitly prohibited in their code of conduct.
- Organizations should develop and enforce explicit expectations and policies regarding appropriate
  and inappropriate interactions between individuals. This is especially important because while some
  behaviors may not be criminal, they may still be inappropriate or increase the risk of abuse. For
  example, inappropriate non-criminal behaviors by employees or volunteers might include showing
  favoritism, giving gifts, and creating opportunities to be alone with consumers.
- Additional consideration should be given to ensuring safe interactions relating to out-of-program communication, including online communications and interactions. The CDC recommends limiting communication that occurs outside the context of the organization and its services. <sup>16</sup>
- Organizations should ensure all policies related to consumer interactions both inside and outside the bounds of program activities are strictly adhered to, because they may be rendered ineffective "if there is a culture of non-compliance [or] leadership is seen to be in breach of policies."<sup>17</sup>

#### **STANDARD 2:**

The organization's policies define appropriate interactions with consumers.



#### **STANDARD 3:**

The organization's policies communicate a strong commitment to respond to any suspicion or allegation of abuse.

#### Research Behind the Standard:

A culture of silence occurs when a condition is known to exist, but by unspoken consensus, is not discussed, and leaders collude not to address the problem. Far too many have been sexually exploited in organizations that lacked transparency and responsibility; where leaders made decisions secretly; and where the leaders prioritized protecting the organization's reputation over the safety and welfare of its consumers. Ideally, organizations replace a code of silence with a code of transparency and shared responsibility for consumers' welfare.<sup>18</sup>

#### Research indicates:

- Employees and volunteers should be taught how to appropriately handle situations where a consumer discloses an instance of sexual abuse and they must have a clear understanding of the continuum from appropriate to inappropriate to harmful behavior within the specific organization as well as the organization's specific reporting structure.<sup>19</sup>
- Employees and volunteers should be aware of their ethical and legal duty to report suspected abuse.<sup>20</sup>

# Components That Ensure the Standard is Being Met: P12. The organization has a policy stating that it takes every allegation of abuse seriously and that it will cooperate fully with the authorities. P13. The organization requires new employees and volunteers to read and sign a statement informing them of their legal and ethical duty to report suspected abuse. P14. The organization requires all employees and volunteers to sign a statement indicating that they will cooperate fully with any investigation and that failure to do so may be grounds for termination.



Comprehensive screening and selection requires organizations to discover and consider everything they can about applicants, and to use what is known about how offenders operate to make thoughtful hiring decisions.



#### **STANDARD 4:**

The organization utilizes a comprehensive screening and selection process that is designed to assess applicants for abuse risk.

#### Research Behind the Standard:

One important prevention strategy is to screen out potential perpetrators from obtaining positions in institutional settings. Recruitment and screening processes allow organizations to attract the best staff and volunteers for the position as well as identify people who are unsuitable or who have intentions to sexually abuse consumers.

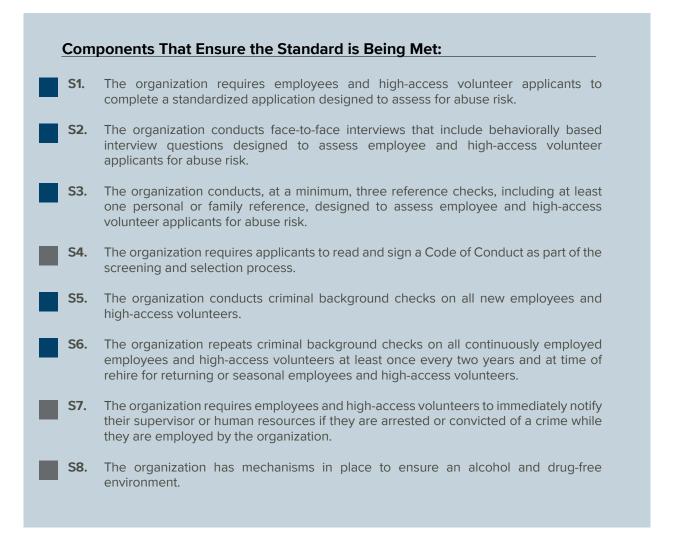
#### Research indicates:

- Reference checks and criminal background checks should be completed for all potential employees and volunteers.<sup>21</sup>
- Criminal background checks should be accompanied by a variety of other safe recruitment practices, such as screening interviews<sup>22</sup> which include questions such as how the applicant might handle different hypothetical situations involving consumers and whether anyone they know would say they should not work with consumers.<sup>23</sup>
- Interviews should include background questions as past behavior predicts future behavior and behaviorally based questions can predict job performance.<sup>24</sup>
- Organizations should utilize "more in-depth written applications and personal interviews for adolescents, for whom work history and criminal background checks may be unavailable; rigorously screening applicants who will have more autonomy as employees or volunteers" and not make exceptions for certain applicants.<sup>25</sup>
- Organizations should provide their code of ethics to applicants during the screening and selection process.<sup>26</sup>

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#### **STANDARD 4:**

The organization utilizes a comprehensive screening and selection process that is designed to assess applicants for abuse risk.



#### **STANDARD 5:**

The organization carefully reviews applicant information gathered during the screening process to guide the final decision.

#### Research Behind the Standard:

An effective and comprehensive screening and selection process offers organizations the best opportunity to identify and screen out applicants who are unsuitable or who have intentions to abuse. While background checks are helpful, they alone, are not enough. Over 75% of child sexual abuse offenders do not have previous sexual offense convictions. Furthermore, criminal background checks will not uncover additional information such as personality disorders, termination from previous positions, or other indicators of sexual abuse intentions. In a review of jury verdicts of child sexual abuse cases from 2013 to 2018, 30% of organizations were found to have negligent hiring practices.

#### Research indicates:

- Organizations should develop explicit screening criteria, identify who will make the final selection, develop consistent and systematic protocols, and consult with an attorney to ensure that the screening and selection process does not violate laws prohibiting discrimination in the workplace. 31
- Organizations should adopt an integrated and comprehensive approach for screening and selection beyond the criminal background check to ensure the best interests of consumers.<sup>32,33</sup>

#### **Components That Ensure the Standard is Being Met:**

- **S9.** The organization has a process for reviewing criminal convictions discovered through the criminal background check.
- **S10.** The organization has a process to systematically review and utilize all applicant information throughout the screening process to assess for abuse risk.



# TRAINING

Effective abuse prevention training gives employees and volunteers the information and skills they need to keep those in their care safe. Training must be frequent, specific, and immediately useful on the job.



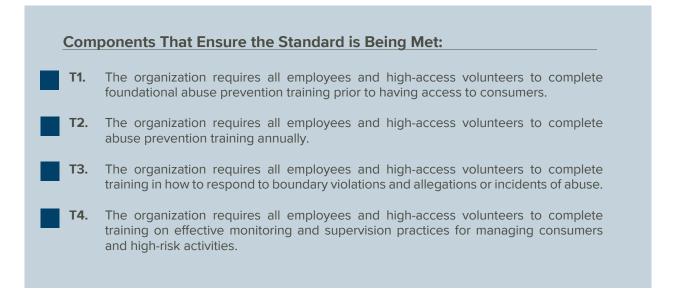
#### **STANDARD 6:**

The organization trains employees and high-access volunteers to equip them with the knowledge and skills necessary for preventing and responding to abuse.

#### Research Behind the Standard:

The importance of training employees and volunteers in abuse prevention is consistently emphasized by experts in consumer safety.<sup>34</sup> Training provides employees and volunteers with "a heightened awareness of an organization's commitment to safety and intolerance of sexual misconduct."<sup>35</sup>

- Employees and volunteers should be educated about the organization's specific abuse prevention policies.<sup>36</sup>
- Training content should include a definition of abuse, information about the nature and indicators for victimization and perpetration,<sup>37</sup> how to maintain appropriate boundaries with consumers, how to recognize boundary violations, and how to respond immediately to inappropriate behavior and policy violations.
- Organizations should treat abuse prevention and responding training as an ongoing event, should develop a regular training schedule, and ensure new employees and volunteers are trained.<sup>38</sup>



#### **STANDARD 7:**

The organization provides employees and high-access volunteers with abuse risk management trainings directly related to their job responsibilities.

#### Research Behind the Standard:

The importance of training employees and volunteers in abuse prevention is consistently emphasized by experts in consumer safety. Training content should include a definition of sexual abuse, as well as information about the nature and indicators for abuse victimization and perpetration.

#### Research indicates:

- Organizations should train employees on their specific roles as they relate to organizational safety.<sup>39</sup>
- Organizations should be "learning institutions where staff and volunteers at all levels are continually building their ability and capacity to protect consumers from harm."

# T5. The organization requires all supervisors to complete training in effective supervision practices related to abuse risk management. T6. The organization requires those who are involved in the hiring process to complete screening and selection training. T7. The organization requires supervisors who respond to inappropriate behaviors or allegations of abuse to complete specialized training.



# MONITORING & SUPERVISION

When employees and volunteers are adequately supervised, potential offenders are less likely to act on their impulses because they face detection.



#### **STANDARD 8:**

The organization systematically supervises employees and volunteers at all levels.

#### Research Behind the Standard:

Organizations can better recognize potential issues and possibly prevent the sexual abuse of a consumer when they regularly supervise and evaluate employees and volunteers. "The lack of ongoing supervision is one of the most serious structural features that makes sexual boundary violations likely." Far too many cases of sexual abuse occur when employees and volunteers work in isolation without any oversight or accountability. In a review of Jury Verdicts from child sexual abuse cases from 2013 to 2018, 72% of organizations were found to have negligent supervision.

#### Research indicates:

- All employees and volunteers should play an active role in monitoring.
- Organizations should monitor interactions between adults and consumers.
- Employees should "receive adequate monitoring, supervision, and evaluation through documented performance reviews." 44
- Organizations should limit or prohibit one-on-one interactions with adults and consumers.<sup>45</sup>

#### Components That Ensure the Standard is Being Met:

- M1. The organization requires employees and volunteers to be easily identifiable.
- **M2.** The organization requires supervisors and administrators to use a variety of methods to monitor employees and volunteers at on-site programs.
- M3. The organization requires supervisors and administrators to use a variety of methods to monitor employees and volunteers at off-site programs.
- **M4.** The organization requires job descriptions and performance evaluations to include items related to abuse risk management.

#### **STANDARD 9:**

The organization systematically monitors consumers.

#### Research Behind the Standard:

"The lack of ongoing supervision is one of the most serious structural features that makes sexual boundary violations likely." One factor that may sometimes be overlooked in organizations, but is an important part of abuse prevention, is maintaining safe and appropriate peer-to-peer interactions. All situations where consumers might be unsupervised should be identified and addressed, as they elevate the risk of sexual interactions, including inappropriate and/or harmful sexual interactions. About half the time, youth are sexually abused by another youth.

#### Research indicates:

- Organizations should monitor peer-to-peer or consumer-to-consumer interactions.
- All employees and volunteers should play an active role in monitoring.
- Organizations should maintain an appropriate ratio of adults to youth.
- Organizations should consider factors such as the age of the youth and the riskiness of the activity when determining the appropriate ratio.<sup>49</sup>

# Components That Ensure the Standard is Being Met: M5. The organization requires programs to adhere to specific adult-to-consumer ratios. M6. The organization requires programs adhere to standard monitoring procedures when consumers enter and exit programs. M7. The organization requires employees and volunteers to adhere to established methods for monitoring and supervising consumer-to-consumer interactions. M8. The organization has a standardized system for monitoring consumers in the facility. M9. The organization has established methods for providing additional supervision for unique consumer needs. M10. The organization has a policy addressing employees' and volunteers' cell phone use while on duty.

#### **STANDARD 10:**

The organization systematically monitors high-risk activities.

#### Research Behind the Standard:

Some activities are associated with an increased risk of abuse and should be prohibited or restricted where possible. Examples of these activities include overnight trips, bathing, changing, bathroom interactions, nighttime activities, and secret ceremonies. Some of these activities (e.g., bathing, nighttime activities) cannot always be avoided involving overnight trips and in these cases, extra precautions should be taken to minimize risk.<sup>50</sup> Praesidium data indicates a large percentage of incidents occurs in private areas such as restrooms, locker rooms, or other areas that are off-limits to the program and during off-site programming.<sup>51</sup>

#### Research indicates:

- Organizations should define and communicate when and where they are responsible for the consumers they serve.
- Protocols that emphasize privacy should be implemented in toileting and showering situations.
- Protocols for high-risk activities should address the risk for sexual abuse by employees or volunteers
  as well as the risk of harmful sexual behavior engaged in by consumers.<sup>52</sup>

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#### **STANDARD 10:**

consumers.

The organization systematically monitors high-risk activities.

### Components That Ensure the Standard is Being Met: M11. The organization requires employees and volunteers to adhere to established methods for monitoring and supervising one-on-one interactions with consumers. M12. The organization requires employees and volunteers to adhere to established methods for supervising off-site activities. M13. The organization requires employees and volunteers to adhere to established methods for monitoring and supervising its mentoring program. M14. The organization requires employees and volunteers to adhere to established methods for monitoring and supervising aquatics programs. M15. The organization requires employees and volunteers to adhere to established methods for monitoring and supervising youth sports programs. M16. The organization requires employees and volunteers to adhere to established methods for monitoring and supervising overnight and residential activities. M17. The organization requires employees and volunteers to adhere to established methods for monitoring and supervising resident and overnight camps. M18. The organization requires employees and volunteers to adhere to established methods for monitoring and supervising bathrooms. M19. The organization requires employees and volunteers to adhere to established methods for monitoring and supervising locker rooms and changing areas. M20. The organization requires employees and volunteers to adhere to established methods for supervising and monitoring diapering, toileting, and personal care assistance. M21. The organization requires employees and volunteers to adhere to established methods for supervising playground and recreational activities. M22. The organization requires employees and volunteers to adhere to established methods for supervising transportation activities. M23. The organization requires employees and volunteers to adhere to established methods for monitoring and supervising quiet time and naptime for young

#### **STANDARD 11:**

The organization systematically manages and monitors program areas and facilities.

#### Research Behind the Standard:

It is essential to create safe environments—both physical and online—to protect consumers in situations in which they are at increased risk for sexual abuse. One important strategy related to the safety of physical environments involves visibility.<sup>53</sup> In a review of jury verdicts from child sexual abuse cases from 2013 to 2018, 16% of organizations were found to have negligent security.<sup>54</sup>

#### Research indicates:

- Organizations should choose spaces in which activities will be easily visible, discouraging individuals from engaging in inappropriate behavior.
- Organizations should ensure interactions are observable and interruptible.
- · Organizations should ensure that there are clear lines of sight throughout the building.
- Organizations should always be aware of who is present at all times and ensure protocols designate
  which people outside the organization can be allowed in and under what circumstances.<sup>55</sup>

#### Components That Ensure the Standard is Being Met:



**M24.** The organization systematically manages and monitors all visitors in the facility.



**M25.** The organization systematically identifies and manages where architecture may compromise supervision.



M26. The organization supervises internet use in the organization's facilities and programs.



# INTERNAL FEEDBACK SYSTEMS

Information about program operations, such as incident reports, client complaints, or external licensing violations, can identify high-risk programs or individuals.



#### **STANDARD 12:**

The organization has mechanisms in place for reporting concerns, complaints, or grievances.

#### Research Behind the Standard:

The well-being of the consumer should remain the most important consideration throughout the process of receiving and responding to complaints.<sup>56</sup>

#### Research indicates:

- Considerations for reporting policy violations and suspected abuse should include clarity; engaging, scenario-based discussions; distinctions between boundary violations and actual offenses; clear delineation of reporting lines; availability of alternative reporting mechanisms when a person in leadership is the one whose behavior is in question; recording concerns and retention of records; and oversight and review to ensure that reports are being addressed appropriately.<sup>57</sup>
- The protocol for responding to complaints should include how to make a complaint, process for responding to a complaint, investigating a complaint, providing support and assistance, and achieving systemic improvements following a complaint.<sup>58</sup>

#### **Components That Ensure the Standard is Being Met:**



**I1.** The organization provides employees and volunteers with a grievance procedure.



12. The organization provides parents/guardians with a grievance procedure.



**13.** The organization provides consumers with a grievance procedure.

#### **STANDARD 13:**

The organization has mechanisms in place for minimizing barriers to reporting concerns, complaints, or grievances.

#### Research Behind the Standard:

Individuals face many obstacles when deciding whether to report known or suspected child sexual abuse. Barriers to reporting may be institutional and/or personal and can compromise safety. "When individuals are faced with barriers, the risk is that they will reframe, minimize, and reinterpret what they are seeing to avoid concluding that they should report." The appropriate culture should "enable organizations to identify concerning behavior early; minimize the risk of abuse and ensure that adults working in the organization are clear about professional boundaries and act within these boundaries."

#### Research indicates:

- Employees should be trained about these barriers to disclosure.<sup>61</sup>
- Organizations should minimize these barriers to reporting.
- Organizations should focus on "creating a culture in which all concerns, including those that do not
  meet the threshold of an allegation, are shared responsibly and with the right person, and recorded
  and dealt with appropriately."<sup>62</sup>
- Organizations should ensure "fair assessment of facts and an effective response" to all concerns. 63

# Components That Ensure the Standard is Being Met: 14. The organization maintains confidentiality when responding to reports. 15. The organization follows up with employees and volunteers who report concerns, complaints, or grievances. 16. The organization follows up with parents/guardians who report concerns, complaints, or grievances. 17. The organization follows up with consumers who report concerns, complaints, or grievances. 18. The organization provides employees and volunteers with an anonymous method for reporting concerns, complaints, and grievances. 19. Methods to report concerns, complaints, or grievances are widely publicized.

#### **STANDARD 14:**

The organization collects, compiles, and analyzes data relevant to the prevention and detection of organizational abuse.

#### Research Behind the Standard:

Organizations often use the "learning from experience" approach after an incident to identify the cause and assist with further prevention measures. <sup>64</sup> Additionally, organizations can utilize near-miss events to implement additional prevention strategies. <sup>65</sup>

#### Research indicates:

• Organizations should focus on identification, reporting, and analysis of incident precursors and near misses to prevent future incidents. 66





#### **STANDARD 15:**

The organization provides consumers with information related to preventing abuse.

#### Research Behind the Standard:

The most effective prevention strategies prevent perpetration of abuse by removing situational factors that enable abuse and educating individuals about appropriate boundaries and harmful behavior.<sup>67</sup>

#### Research indicates:

- Organizations should provide consumers with information about abuse and what constitutes appropriate and inappropriate interactions with employees and volunteers, including online interactions.<sup>68</sup>
- Organizations should ensure the information provided to consumers is both developmentally appropriate and at the proper skill level.<sup>69</sup>

#### Components That Ensure the Standard is Being Met:

- **C1.** The organization provides consumers with developmentally appropriate and age-appropriate information about protecting themselves from abuse.
- **C2.** The organization provides consumers with information on the organization's policies and procedures related to abuse prevention.
- The organization uses a variety of methods for maintaining ongoing awareness of abuse risk and prevention amongst consumers.

#### **STANDARD 16:**

The organization provides parents/guardians with information related to preventing abuse.

#### Research Behind the Standard:

Caregivers need to understand sexual abuse and their role in preventing it, with an emphasis on education about the organization's sexual abuse prevention policies and procedures.<sup>70</sup> Offenders often attempt to groom parents or guardians to more easily facilitate the abuse of their consumers.<sup>71</sup>

#### Research indicates:

- Education for parents and guardians should include appropriate, inappropriate, and harmful behaviors; commonly held myths about sexual abuse; warning signs for sexually offending behaviors and victimization; strategies for talking with their children about sexual abuse; caregivers' responsibility to act if they learn about inappropriate or harmful behaviors; and where to go for help within the organization.
- Organizations should also inform caregivers about the organization's specific sexual abuse prevention policies and procedures so they know what the organization expects of them and what they can expect of the organization and its employees and volunteers.<sup>72</sup>

#### **Components That Ensure the Standard is Being Met:**

- **C4.** The organization provides parents and guardians with information about how to protect their consumers from abuse.
- C5. The organization provides parents and guardians with information on the organization's policies and procedures related to abuse prevention.
- **C6.** The organization uses a variety of methods for maintaining ongoing awareness of abuse risk and prevention among parents and quardians.



How an organization responds to reports of suspicious or inappropriate interactions, policy violations, or suspected abuse can dramatically affect the harm to the individual and to the organization.



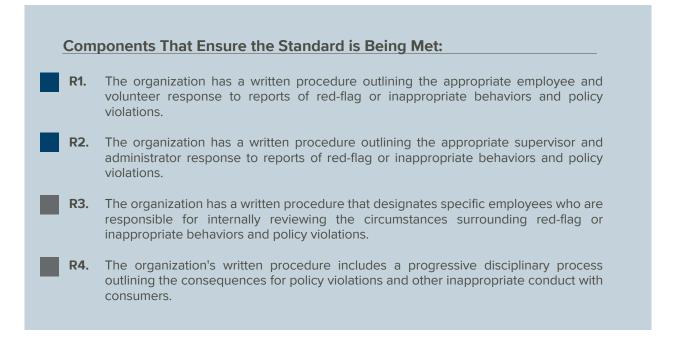
#### **STANDARD 17:**

The organization defines everyone's role in responding to reports of red-flag or inappropriate behaviors and/or policy violations.

#### Research Behind the Standard:

Rather than offending with intention and premeditation, many individuals appear to make bad judgments and "slip down the slippery slope of boundary violations," especially when they work in settings where they have access to consumers. After organizations have delineated acceptable and unacceptable behaviors, the goal becomes preventing, recognizing, and responding to inappropriate behaviors and reinforcing appropriate behaviors. In a review of jury verdicts from child sexual abuse cases from 2013 to 2018, 30% of organizations were found to have negligent retention.

- Organizations should have a clear reporting structure and protocol so that employees and volunteers know who to contact if they observe suspicious or inappropriate behavior which should include alternate options for situations when the report involves individuals in positions of authority.
- All employees and volunteers should be trained to respond immediately to inappropriate behaviors or policy violations.
- The consequences for violating policies must be explicitly defined and consistently upheld, even when abuse is not suspected.<sup>76</sup>



#### **STANDARD 18:**

The organization defines everyone's role in responding to allegations or incidents of abuse.

#### Research Behind the Standard:

The well-being of the consumer should remain the most important consideration throughout the responding process. Apologies provide emotional benefits for both the giver and receiver. Apologies can also lead to forgiveness, which is also healthier for both sides and can lead to earlier satisfaction, closure of suits, faster settlements, even reducing resolution time by half, and lower damage payments. In a review of jury verdicts from child sexual abuse cases from 2013 to 2018, 14% of organizations were found to have a negligent investigation.

- Organizations should ensure a report must always be made to authorities if abuse is disclosed or someone within an organization suspects that abuse has occurred.
- Organizations should have "a clear, accessible...complaint handling policy and procedure that sets
  out how the institution should respond to complaints" and should include how to make a complaint,
  the process of responding to a complaint, investigating a complaint, providing support and
  assistance, and achieving systemic improvements following a complaint.<sup>81</sup>
- Reporting procedures should be consistent with state law, and youth-serving organizations should work with a child advocacy center to ensure that their definition of reasonable suspicion is appropriate.
- Organizations should make explicit that leadership is "professionally and legally accountable for ensuring that all cases of abuse are reported to the proper authorities."
- Organizations should ensure employees and volunteers do not take on the role of investigating violations of policy or allegations of abuse themselves to avoid harming the consumers involved or the legal investigative process.
- Internal records of allegations and steps taken to respond to them should be maintained.



#### **STANDARD 19:**

The organization defines everyone's role in responding to consumer-toconsumer sexual activity.

#### Research Behind the Standard:

One factor that may sometimes be overlooked in organizations, but is an important part of abuse prevention, is maintaining safe and appropriate consumer-to-consumer interactions. While organizations promote healthy, positive relationships among consumers, they should acknowledge the potential for negative interactions like bullying and inappropriate sexual behavior.<sup>83</sup>

- Organizations should ensure a report must always be made to authorities if abuse is disclosed or someone within an organization suspects that abuse has occurred.
- Organizations should have "a clear, accessible...complaint handling policy and procedure that sets
  out how the institution should respond to complaints" and should include making a complaint,
  responding to a complaint, investigating a complaint, providing support and assistance, and
  achieving systemic improvements following a complaint.<sup>84</sup>
- Reporting procedures should be consistent with state law, and youth-serving organizations should work with a child advocacy center to ensure that their definition of reasonable suspicion is appropriate.
- Organizations should make explicit that leadership is "professionally and legally accountable for ensuring that all cases of abuse are reported to the proper authorities."
- Organizations should ensure employees and volunteers do not take on the role of investigating violations of policy or allegations of abuse themselves to avoid harming the consumers involved or the legal investigative process.
- Internal records of allegations and steps taken to respond to them should be maintained.





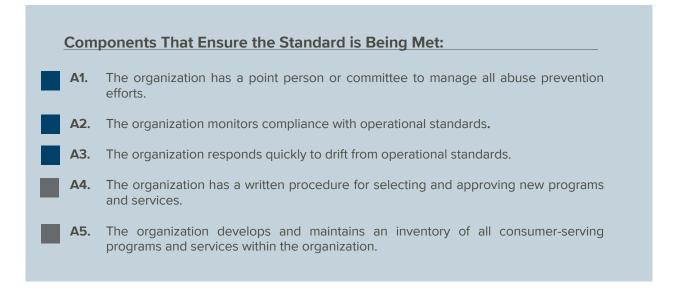
#### **STANDARD 20:**

The organization's abuse risk management standards are consistently in place across all programs.

#### Research Behind the Standard:

Insights from regulatory theory shed light on one of the greatest challenges faced by organizations in effectively preventing, identifying, and responding to abuse; choosing strategies that will obtain optimal compliance. Be Deviations or drift from standards allows for the normalization of misconduct. Studies emphasize the importance of organizational culture and the leadership's role in demonstrating the organization's commitment to maintaining a safe environment for consumers.

- Organizations should have a zero-tolerance approach that is endorsed by leadership and managed by designated individuals.
- Organizations should have measures in place for consistent monitoring of organizational policy including formal staff supervision, and external auditing.
- Organizations should ensure quality assurance and reviews of implementation are conducted at regular intervals.



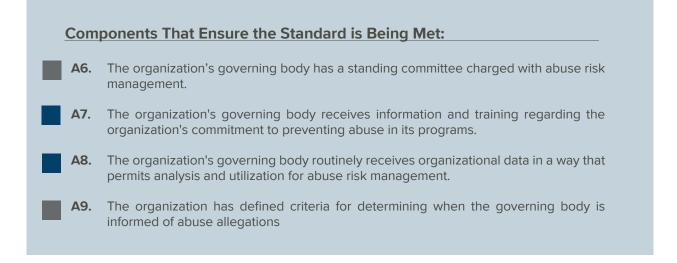
#### **STANDARD 21:**

The organization's abuse risk management is a function of its governing body.

#### Research Behind the Standard:

The optimal approach to implementing the dimensions of regulation required for effective abuse prevention in organizations is a "unified, centralized approach implemented by a central authority having the power and capacity to develop, communicate, administer and enforce the desired measures." This approach promotes the quality of design and best practices and avoids fragmentation of policy and practice. Studies emphasize the importance of organizational culture and the leadership's in demonstrating the organization's commitment to maintaining a safe environment for consumers. 90

- Organizations should have a centralized regulatory body that is responsible for the key dimensions
  of abuse prevention, including organizational policy, safe hiring and screening, safe environments,
  education, and training.<sup>91</sup>
- Organizations should include a range of stakeholders in their abuse prevention practices, including board members.
- Organizations should ensure reporting procedures include internal notification of both leadership and board.<sup>92</sup>



#### STANDARD 22:

The organization has a defined process for establishing and managing abuse risk management practices with third-party agreements.

#### Research Behind the Standard:

Organizations can have third parties on their premises for a variety of reasons which can increase risk. Employers can be liable for third-party harassment if they "fail to take appropriate corrective action reasonably likely to prevent the misconduct from recurring."93 Furthermore, federal regulations state that employers can "be held responsible for the acts of non-employees where the employer (or its agents or supervisory employees) knows or should have known of the conduct and fails to take immediate and appropriate corrective action."94

#### Research indicates:

- · Organizations should have protocols for monitoring who is allowed on the premises and under what
- · Organizations should consider screening, training, supervision, and insurance coverage when working with third parties.96

#### **Components That Ensure the Standard is Being Met:**

- - A10. The organization requires all third-party organizations to read and sign a Code of Conduct, which includes information about behavioral expectations.
- A11. The organization requires all third-party organizations to conduct a minimal level of screening on all individuals who may have access to the facility or consumers.
- A12. The organization requires all third-party organizations to provide all individuals who may have access to the facility or consumers with minimal abuse prevention and responding training.
- A13. The organization uses a variety of methods for monitoring and supervising third-party organizations.
- A14. The organization requires all third-party organizations to follow the organization's responding requirements.

#### **STANDARD 23:**

The organization has standards in place for its volunteers.

#### Research Behind the Standard:

Perpetrators often use various strategies to gain trust so that they will have greater opportunities to abuse.<sup>97</sup> Volunteers can have access to consumers and are placed in a position of authority and trust.<sup>98</sup>

#### Research indicates:

- Organizations should adopt similar practices in regard to policies, screening, training, monitoring and supervision, and reporting protocols for volunteers. 99,100
- Organizations should modify these practices based on level of access and autonomy.<sup>101</sup>

#### **Components That Ensure the Standard is Being Met:**

- **A15.** The organization has a defined process for identifying if a volunteer is considered a low-access or high-access volunteer.
- **A16.** The organization has a screening and selection process in place for its low-access volunteers designed to screen for the potential to abuse.
- **A17.** The organization has a training delivery system for low-access volunteers that ensures abuse prevention training is available, completed, and documented as required.

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