



# Act One

## Child Protection

### Sexual Abuse Prevention

## The Importance of Child Protection Policies and Procedures

Child protection policies create barriers for sex offenders. The more rules and regulations that WNESU has in place, the less likely an offender will want to work here. As a child-centered organization, we base our policies and procedures on:

- **A shared understanding** by employees/volunteers of what constitutes child sexual abuse and exploitation and how to recognize and prevent it.
- **Trained employees/volunteers** that are equipped to recognize situations of potential abuse and inappropriate behaviour, and the response that is expected of them in these situations.
- **Clear lines of communication, authority and decision-making** so that employees/volunteers have well-defined procedures and a consistent approach for handling all child protection issues.
- **Regular review** of the effectiveness of policies and procedures whereby WNESU assesses if any adjustments, additions or improvements are required
- **Openness** about our work and how we conduct it. WNESU has an atmosphere where child sexual abuse/misconduct can be raised and addressed. We critically assess our practice in an effort to continuously improve organizational child protection measures.
- **Equity and fairness** by treating all reports with the same importance.
- **Dignity and respect** by keeping sensitive personal information confidential, and only sharing it on a 'need-to-know' basis.
- **Coordination** with other organizations that can assist with child protection matters. This can include child welfare, law enforcement and legal counsel.

## Child Abuse Definitions

In order to prevent child sexual abuse at WNESU, it is first necessary to understand child sexual abuse, how offenders groom, signs of a disclosure and the impact of abuse on victims. In understanding child sexual abuse a major step is taken towards addressing the problem constructively and promoting positive change.

### Vermont statute defines child sexual abuse as:

*Any act or acts by any person involving sexual molestation or exploitation of a child including but not limited to incest, prostitution, rape, sodomy, or any lewd and lascivious conduct involving a child. Sexual abuse also includes the aiding, abetting, counselling, hiring, or procuring of a child to perform or participate in any photograph, motion picture, exhibition, show, representation, or other presentation which, in whole or in part, depicts a sexual conduct, sexual excitement or sadomasochistic abuse involving a child.*

## Grooming

An individual who sexually abuses a child often uses a variety of techniques to gain sexual access to the child. The individual first gains the trust of the child and the adults around the child. An emotional connection is purposely built to reduce the likelihood that the child will disclose the abuse.

This process is known as grooming. Grooming is often a slow, gradual and escalating process of building trust and comfort with a child. The offender's goal is to have the child see him/her as a caring adult the child can trust and whose directions they should follow.

Grooming also includes the process of making inappropriate behaviour seem normal. This process of normalizing inappropriate behavior can range from the telling of sexual jokes to physical contact. Once trust has been established, the result can be a child who is very confused, one who is torn between what they know to be wrong and their feelings for the offender.

Although the purpose of grooming is to non-violently access and control children, in extreme cases offenders may also attempt to physically maintain control over children.

In extreme cases, some offenders may attempt to gain control over a child through the use of threats (to the child, his/her pets or family) and/or physical force. This type of violence may be used to overcome resistance, maintain compliance, and/or prevent the child from disclosing the abuse.

It is of the utmost importance to realize that the reason cooperative and compliant children are victims is not because they were groomed, manipulated or brainwashed but simply because they are children.

## Code of Conduct

As a reputable child-serving organization, WNESU has developed the following code of conduct to guide our employees/volunteers. While every employee/volunteer is valued and unique, we come together as an organization in the best interests of children and their families. The safety, rights and well-being of children we serve are at the core of our daily operations. We nurture supportive relationships with children while balancing and encouraging appropriate boundaries.

Employee/volunteer misconduct will not be tolerated, especially as it relates to the well-being of the children in the organization's care.

**Misconduct refers to inappropriate behavior in the organization and includes but is not limited to any/all of the following:**

- Communication that goes beyond the employee/volunteer's employment responsibilities with the child and/or does not occur within the context of their duties and responsibilities such as:
  - Writing personal letters or text messages to a child.
  - Making personal phone calls to a child.
  - Having personal Internet exchanges with a child (email, instant messaging, chatting, social networking, etc.).
  - Sending personalized gifts to a child.

**Note:** It is not misconduct to give a contextually appropriate thank-you card, birthday card, seasonal card, or other nominal gift to a child, where such a gesture would be considered reasonable in the circumstances provided that all gestures, taken together, are not excessive in number and any such exchanges are carried out within the workplace, in the presence of others and with the knowledge of the organization.

- Offering unauthorized rides to an individual child.
- Spending time with a child outside of designated work times and activities (except where such activity results from a parent-initiated request and the activity has been disclosed to and approved by the organization in advance).
- Favoring a child.
- Telling sexual jokes to a child.
- Taking pictures of a child, except when specifically requested to do so by the organization and provided that only cameras owned or under the control of the organization are used to take such pictures.

**Note:** Under no circumstances may an employee ever use his/her cellular phone or personal camera to take pictures of a child, nor upload or copy any pictures he/she may have taken of a child to the Internet or to any personal storage device.

### Employees/volunteers of Washington Northeast Supervisory Union must:

- Always adhere to the organization's policies and procedures in dealing with children.
- Treat children with respect and dignity.
- Treat all allegations or suspicions of sexual abuse seriously. It is an employee/volunteer's responsibility to report suspected abuse.
- Follow established procedures when reporting any allegations of misconduct or potential policy violations.
- Consider the final outcomes of any behavior, as well as a child's reaction to any activities, conversations, or interactions so as to avoid embarrassing, shaming, or humiliating the child.
- Establish, respect, and maintain boundaries with all children.

### Employees/volunteers of Washington Northeast Supervisory Union must not:

- Engage in any activity that endangers a child or makes a child feel uncomfortable.
- Engage in any activity that goes against the organization's mandate, policies, or code of conduct.
- Make any sort of remark, comment, or joke to/regarding a child that is in any way suggestive, explicit, or sexual.
- Engage in any sort of physical contact with a child that may make the child feel uncomfortable, or that violates reasonable boundaries.
- Conduct their own investigation into allegations or suspicions of sexual misconduct – it is an employee/volunteer's duty to report, not to investigate.
- Place a child in danger from anyone, either within or outside of the organization.
- Offer any child "special" treatment that falls outside of the organization's mandate, or that may (or may appear to) place a child at risk of exploitation.
- photograph, videotape, or otherwise record a child unless it has been pre-approved by the child's parent and his/her supervisor.
- have children at his/her home without a parent's permission **and** authorization from his/her supervisor.

### Employees/volunteers of Washington Northeast Supervisory Union should consider whether:

- The activities they are engaging in with a child are known to, or approved by, supervisors and/or parents. Child interactions should not be kept secret. They should be transparent.
- Activities would raise concerns in the mind of a reasonable observer as to their appropriateness.

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- The organization may be detrimentally affected by the employees/volunteers activities.
- The activity may be reasonably regarded as posing a risk to the personal integrity or security of a child.
- The activity may contribute to a child's discomfort.
- The activity may appear inappropriate to the organization, the child's family, or the public.

**Note:** Poor judgment will not be accepted as an excuse for inappropriate behavior.

Failure to adhere to the code of conduct by any employee/volunteer will result in an investigation and disciplinary action if necessary. Appropriate consequences / disciplinary actions are to be determined by management, and will be based on the nature and severity of the incident.

## Reporting and Documenting Suspected Child Sexual Abuse

At WNESU, all children have the right to a safe and respectful environment that is free from sexual abuse. Any acts committed by an employee/volunteer that violate the code of conduct will not be tolerated. Any employee/volunteer engaging in such acts will be subject to a range of disciplinary procedures up to and including dismissal (see Suspension/Dismissal: Potentially Illegal Behaviour policy on page [Insert page number]). Similarly, employees/volunteers who are aware of breaches of the code of conduct, but fail to take appropriate action, may be subject to discipline.

Washington Northeast Supervisory Union is committed to:

- Ensuring suspected abuse is reported
- Ensuring we create an environment that encourages reporting
- Treating all complaints as confidential

### Parameters

This applies to all employees/volunteers of WNESU including full-time, part-time, contract, temporary or casual.

Employees/volunteers are required to immediately report all disclosures, allegations or indicators of sexual abuse regardless of source or content.

### Procedures

Employee/volunteer:

1. Report suspected child sexual abuse, including any disclosures, to the Vermont Department for Children and Families (DCF)—within 24 hours.
2. Document the information using Incident Report Form A.
3. Inform supervisor about the report and provide him/her with the incident report form.
4. Keep the information confidential.
5. Do not investigate the allegation or determine accuracy.

## Reporting and Documenting Misconduct (Inappropriate Behaviour)

At Washington Northeast Supervisory Union, all children have the right to a safe and respectful environment free from sexual abuse and/or inappropriate conduct. Acts committed by an employee/volunteer that violate the code of conduct will not be tolerated. Any employee/volunteer engaging in such acts will be subject to a range of disciplinary procedures up to and including dismissal. Similarly, employees/volunteers who are aware of breaches of the code of conduct, but fail to take appropriate action, may be subject to discipline.

Washington Northeast Supervisory Union is committed to:

- Ensuring that prompt action is taken in regard to allegations of misconduct.
- Ensuring we create an environment that encourages reporting.
- Treating all complaints as confidential.

### Parameters

This applies to all employees/volunteers of WNESU including full-time, part-time, contract, temporary or casual.

Employees/volunteers are required to immediately report all inappropriate behaviour or allegations of inappropriate behaviour as defined in the code of conduct.

### Procedures

#### Employee/volunteer:

1. Treat the allegations of inappropriate behaviour seriously and reassure the child (if appropriate).
  - a. Document disclosure on Incident Report Form B.
2. Report immediately to your supervisor.
  - a. Document discussion on Incident Report Form B.
3. Keep the information confidential.
4. Do not investigate the allegation or determine accuracy.

## Supervisor:

1. Consult with the Principal and determine whether concern is warranted.
  - a. Document determination on Incident Report Form B.

## Principal and Supervisor:

1. Meet with accused employee/volunteer to discuss concerns reported.
  - a. Tell the employee/volunteer about the complaint without disclosing the source.
  - b. Ask the employee/volunteer to share his/her version of the story.
  - c. Document the discussion on Incident Report Form B.
2. Perform an investigation.
3. Seek legal counsel.
4. Document the outcome of the investigation on Incident Report Form B.

## Other Matters of Note

### Interference With the Conduct of an Investigation

A threat or promise made to discourage the filing of a complaint, or any interference with the conduct of an investigation, including an attempt to have a complaint withdrawn, is strictly prohibited and will result in disciplinary action.

### Confidentiality

All complaints will be handled in confidence. We will not disclose the identity of any parties involved, or the circumstances of the complaint, except where necessary for the purpose of investigative or corrective action, where required by law, or for the protection of individuals. Similarly, employees/volunteers interviewed as part of an investigation under this policy shall treat all information in a confidential manner. An employee/volunteer who breaches confidentiality may be subject to discipline.

A copy of the documented incident shall be placed in the accused employee/volunteer's human resource file. Any identifying information about the child victim or reporting person shall be removed from this copy. A generic letter shall also be placed in the file that indicates the alleged offence, how it was handled, and any follow-up that was completed.

## Confidential Information

Employees/volunteers of WNESU are regularly entrusted with confidential information regarding the community it serves. All information with respect to third parties (including information related to children and families) received by employees/volunteers in the course of their involvement with WNESU are regarded as confidential.

Suspicious of child sexual abuse will only be shared with the employees/volunteers in the organization who need to know. WNESU will maintain confidentiality while keeping the interests of the child as the primary concern.

### Procedure

#### Employees/volunteers:

1. All complaints against employees/volunteers will be directed through the formal complaint process in a prompt manner.
  2. No employee/volunteer shall attempt to address the situation on his/her own.
  3. No employee/volunteer shall engage in, or threaten to engage in, retaliation against anyone who discloses, reports, or otherwise provides information with respect to alleged sexual abuse or misconduct.
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1. No employee/volunteer shall disclose any information to the public or to the media regarding WNESU policies, operations, employees, volunteers or complaints (reports).
  2. Upon commencement of employment, the employee/volunteer shall sign a confidentiality agreement.

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