

**GRANTEE CERTIFICATION OF COMPLIANCE
WITH CHILD PROTECTION LAWS**

The City of Santa Monica (“City”) is committed to providing youth with the highest quality services available and creating an environment for youth that is safe, nurturing, empowering, and promotes growth and success. _____ (“Grantee”) acknowledges this commitment, and hereby certifies that Grantee will similarly maintain this commitment and in furtherance of this commitment will ensure that all of its officers, administrators, employees, contractors, and volunteers who may or will have contact with minors while providing services or performing activities that are directly or indirectly funded with City funds (the “Relevant Personnel”) are screened in accordance with, receive training on, and comply with all federal, state, and local laws, ordinances, regulations, and directives, as well as all rules imposed by school districts or other government agencies, that are directed at preventing abuse or neglect of minors or promoting the safety, protection, and wellbeing of minors (collectively “Child Protection Laws”), including without limitation, where applicable, any of the following:

requirements for the performance of “Live Scan” background checks which involve submitting fingerprints to the Department of Justice and Federal Bureau of Investigation for all available criminal history information (see California Education Code § 10911.5; California Penal Code § 11105.03);

requirements to undergo Tuberculosis (TB) risk assessments and/or examinations and produce certificates that show individuals are free of infectious tuberculosis (see California Education Code §§ 49406 and 87408.6; California Health and Safety Code §§ 1597.055, 121525, 121545, and 121555.); and/or

requirements to complete Child Abuse Mandated Reporter Training in compliance with the California Child Abuse and Neglect Reporting Act (see California Penal Code §§ 11164-11174.3).

On behalf of Grantee, understanding that this certification is a condition of receiving grant funds and that the accuracy of this certification will be relied on by the City of Santa Monica in disbursing grant funds, I hereby represent, certify, and agree as follows:

- (1) I have the authority to execute this certification on behalf of Grantee.
- (2) I have reviewed the above and understand the requirements of this certification.
- (3) I understand and agree that it is Grantee’s sole responsibility to ensure that Grantee and the Relevant Personnel understand Child Protection Laws and comply with all applicable requirements imposed by those laws.

- (4) I certify that Grantee has implemented policies and procedures to ensure that Grantee and the Relevant Personnel comply with all applicable Child Protection Laws.

- (5) I further certify that, to ensure that Grantee provides youth with the highest quality services in an environment that is safe, nurturing, empowering, promotes growth and success, and is free from abuse or neglect, Grantee has implemented policies and procedures regarding child protection similar to those set forth in the attached Exhibits A, B, and C to City of Santa Monica Administrative Instruction III-5-12.

- (6) I authorize the City to make inquiries, including requesting that Grantee provide documentation, as necessary, to verify that Grantee and the Relevant Personnel are in compliance with all applicable Child Protection Laws and have in place policies and procedures regarding child protection as required above.

Agency: _____

By: _____

Print Name: _____

Title: _____

Date: _____

EXHIBIT A:
CODE OF CONDUCT FOR PROVIDING
SERVICES TO YOUTH

CODE OF CONDUCT FOR PROVIDING SERVICES TO YOUTH

The Code of Conduct for Providing Services to Youth outlines specific expectations for all staff employees, staff volunteers, and contractors (collectively “Staff”) for any City-managed youth program. Staff are expected to act conscientiously to exemplify the highest ethical standards. While the City encourages the cultivation of positive relationships with youth, Staff must take care that efforts to cultivate such relationships do not place youth or them in vulnerable situations. Accordingly, when working in connection with the City-managed youth program, all Staff must at all times comply with all of the following:

1. Staff understand that the City of Santa Monica has zero tolerance for abuse.
2. Staff will treat youth with dignity and respect.
3. Staff will treat youth fairly regardless of race, color, sex, sexual orientation, gender identity, gender expression, ancestry, national-origin, religion, medical condition, or physical or mental disability.
4. Staff will ensure that youth are adequately supervised in accordance with recommended supervision ratios.
5. Staff will dress appropriately to the occasion, task, and company present.
6. Staff will seek guidance from a program supervisor if they are unsure about anything relating to the conduct of Staff or youth.
7. Staff will not stare at or comment on youth bodies.
8. Staff will not date or engage in physical or romantic relationships with youth.
9. Staff will not use or be under the influence of alcohol or illegal drugs in the presence of youth or at any facility used to provide services to youth.
10. Staff will not have printed or online pornography in the presence of youth or at any facility used to provide services to youth.
11. Staff will not have secrets with youth.
12. Staff will not give to any youth gifts, rewards, or incentives (including food) that are not program related.
13. Unless a program supervisor has agreed that greater confidentiality is absolutely necessary to the service being provided (for example, individual therapy that requires privacy for confidential communications): (a) Staff will not meet individually with youth behind closed doors or in any other setting outside the view of other adults; (b) interactions with youth should occur in view of other adults; (c) if Staff believes there is a need for a private or one-on-one discussion to address something personal or sensitive, Staff should conduct the discussion in a quiet place that can be monitored or seen by another adult Staff; (d) Staff will notify the Staff’s supervisor in advance of the individual meeting and its purpose; and (e) immediately, or as soon as practically possible, after the meeting, Staff will report the meeting to the Staff’s supervisor, identify to the Staff supervisor

the other Staff who witnessed the meeting, and provide the Staff supervisor with a full description of what occurred during the meeting. Where a program supervisor has agreed that greater confidentiality is absolutely necessary to the service being provided, Staff will still notify the Staff's supervisor of the time, place, and duration of the meeting, and, to the extent possible without breaching required confidentiality, the general nature of what occurred during the meeting, including any unusual occurrences.

14. Staff will not abuse youth in anyway. In addition, Staff have an obligation to do all they can to prevent abuse of youth by anyone, including other Staff, other adults, or other youth. Abuse includes, but is not limited to, any of the following:

- a. *Physical abuse*: striking, kicking, hitting, spanking, shaking, slapping, biting, hair pulling, choking, throwing, whipping, unnecessary restraints, or other action that injures a child;
- b. *Verbal abuse*: degrading, threatening, cursing;
- c. *Sexual abuse*: inappropriate touching, exposing oneself, sex of any kind, obscene phone calls, text messages, or digital interactions, or other sexual conduct that is harmful to a child's mental, emotional, or physical welfare;
- d. *Emotional abuse*: shaming, humiliating, isolating, terrorizing, cruelty.

15. Staff will not mistreat or bully youth in any way. In addition, Staff have an obligation to do all they can to prevent mistreatment or bullying of youth by anyone, including other Staff, other adults, or other youth. Bullying is aggressive or threatening behavior that is intentional, repeated, and involves an imbalance of power or strength. Bullying may be based on, but not limited to, actual or perceived race, color, ethnicity, religion, national origin, sex, age, marital status, personal appearance, sexual orientation, gender identity or expression, intellectual ability, familial status, family responsibilities, matriculation, political affiliation, genetic information, disability, source of income, or any other distinguishing characteristic, or on a person's association with a person or group with any of the actual or perceived foregoing characteristics. Bullying can take on various forms and includes, but is not limited to, any of the following:

- a. *Physical bullying* involves unwanted physical contact and using physical force to hurt a person's body or possessions. Physical bullying can include: (i) hitting, punching, pushing, shoving, kicking, tripping, pinching, or restraining another; (ii) spitting on another; (iii) taking, hiding, or breaking another's things.
- b. *Verbal bullying and bullying using non-verbal gestures* involves using words, whether spoken (including in telephone calls) or written (including in texts, emails, or graffiti), or non-verbal gestures, to harm another or convey a threat of harm to another. Verbal bullying can include: (i) teasing; (ii) name-calling; (iii) taunting; (iv) mean, rude, threatening, or vulgar gestures.

- c. *Social bullying (sometimes also referred to as relational bullying)* involves hurting or threatening to hurt someone's reputation or relationships. Social bullying can include: (i) social exclusion, that is, excluding someone from social interactions; (ii) friendship manipulation, that is, telling others not to be friends with someone, or only to be friends with certain others; (iii) spreading rumors or gossip about someone; (iv) embarrassing someone in public or in front of a group of friends; (v) hazing a person seeking to join or participate in a group by engaging in or encouraging conduct that humiliates, degrades, abuses, or endangers that person, regardless of that person's willingness to participate in the conduct.
 - d. *Cyberbullying* involves verbal or social bullying that is carried out using any form of electronic communication, including but not limited to email, instant messages, text messages, or postings (whether on social media, a website, a blog, a chatroom, or in any other way), to communicate text, video, audio, digital pictures, or digital images. Cyberbullying can include: (i) sending or posting mean, rude, threatening, or vulgar messages or images; (ii) sending or posting threats of harm; (iii) sending or posting sensitive, private information about another person; (iv) .sending or posting harassing messages or images; (v) encouraging others to exclude someone from an online group; (vi) breaking into another's electronic account and assuming that person's identity in sending or posting information to damage that person's reputation or harm other individuals.
 - e. *Sexualized bullying* involves engaging in any of the other types of bullying using behaviors that are sexual in nature. Sexualized bullying can include: (i) sexting; (ii) , exposing or threatening or demanding the exposure of, private body parts; (iii) inappropriate sexual comments, gestures, or innuendo.
16. Staff will adhere to the City's standards for youth programs regarding all of the following:
- a. appropriate and inappropriate physical interactions with youth;
 - b. appropriate and inappropriate verbal interactions with youth; and,
 - c. appropriate and inappropriate electronic communications with youth.
17. All staff employees whose duties require direct contact with and supervision of children must understand that under California law (Penal Code § 11165.7(a)(8)) they are mandated reporters and, as a result, each must, as soon as is practicably possible, make a report to the Department of Children and Family Services ("DCFS") or the Santa Monica Police Department ("SMPD"), whenever he or she, within the scope of his or her employment, has knowledge of or observes a child whom he or she knows or reasonably suspects has been the victim of child abuse or neglect. To comply with this obligation, staff employees must
- a. be familiar with the symptoms of child abuse and neglect;
 - b. know and follow City policies and procedures intended to protect children against abuse and neglect; and

- c. report suspected child abuse or neglect to DCFS or SMPD as required by state mandated reporter laws, including an initial report by telephone as soon as is practically possible, with a follow-up written report within 36 hours.
18. Separate and apart from staff employees' obligations as mandated reporters under California law, all Staff will immediately report any concerns or complaints about abuse, neglect, bullying, or any conduct in violation of City standards regarding physical interactions, verbal interactions, or electronic communications with youth, by other Staff, other adults, or other youth, to their immediate supervisor (or if the concerns relate to that supervisor, to the program manager, program administrator, division manager, and/or department leadership) and/or the City's anonymous ethics hotline at santamonica@myeccho.org or 844-4-SMETHIC.
19. The City cooperates fully with law enforcement authorities to investigate all cases of alleged abuse or neglect. All Staff must fully cooperate in any external investigation by outside authorities or internal investigation conducted by the City or persons given investigative authority by the City

EXHIBIT B:
STANDARDS FOR CITY-MANAGED YOUTH
PROGRAMS

Standards for City-Managed Youth Programs

The following standards apply to all staff employees, volunteers, and contractors (collectively “Staff”) for any City-managed youth program. Staff are expected to act conscientiously to exemplify the highest ethical standards. While the City encourages the cultivation of positive relationships with youth, Staff must take care that efforts to cultivate such relationships do not place youth or them in vulnerable situations. Accordingly, when working with youth, all Staff must at all times comply with all of the following standards.

I. Interactions with Youth

A. Physical Interactions

The City’s physical interaction standards are intended to promote a positive, nurturing environment while protecting youth and Staff. The City permits the physical interactions listed as appropriate below, but only when appropriate to a situation occurring within the program’s scope. The City prohibits physical interactions of the type set forth as inappropriate below. Any inappropriate physical interactions by Staff with youth will result in disciplinary action, up to and including termination of employment.

The City’s standards for appropriate and inappropriate physical interactions are:

<i>Appropriate Physical Interactions</i>	<i>Inappropriate Physical Interactions</i>
<ul style="list-style-type: none"> • Side hugs • Shoulder-to-shoulder or “temple” hugs • Brief pats on the shoulder or back • Handshakes • High-fives and hand slapping • Briefly touching hands, shoulders, and arms • Briefly placing arms around shoulders • Holding hands with young children in an escorting situation • Physical contact necessary for providing valid medical assistance or for providing needed assistance to special needs youth • Physical intervention necessary to separate youth involved in a physical altercation 	<ul style="list-style-type: none"> • Full-frontal hugs • Kisses • Lap sitting • Wrestling • Piggyback rides • Tickling • Touching bottom, chest, or genital areas • Touching, grooming, or playing with hair • Any type of massage • Allowing a youth to cling to a Staff member’s leg • Any physical act of affection that is unwanted by the youth • Any physical act of affection that occurs in an isolated area

B. Verbal Interactions

The City’s verbal interaction standards prohibit Staff from all of the following: (a) speaking to youth in a way that is, or could be construed by any observer to be, harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning, or humiliating; (b) speaking to youth in a way that is, or could be construed by any observer, as demonstrating any bias or discriminatory intent based on race, color, sex, sexual orientation, gender identity, gender expression, ancestry, national-origin, religion, medical condition, or physical or mental disability; (c) initiating any sexually oriented conversation with youth; and (d) discussing their own sexual activities with youth.

The City’s standards for appropriate and inappropriate verbal interactions are:

<i>Appropriate Verbal Interactions</i>	<i>Inappropriate Verbal Interactions</i>
<ul style="list-style-type: none"> • Instruction and guidance • Positive reinforcement • Encouragement • Praise • Appropriate critiques where necessary to the program (e.g., “your hand was in the wrong position” when giving a swim lesson), provided in a non-derogatory fashion • Appropriate jokes 	<ul style="list-style-type: none"> • Initiating sexually oriented conversations • Discussing staff or volunteer sexual encounters • In any way involving youth in the personal problems or issues of staff and volunteers • Off-color or sexual jokes • Remarks demonstrating any bias or discriminatory intent based on race, color, sex, sexual orientation, gender identity, gender expression, ancestry, national-origin, religion, medical condition, or physical or mental disability • Secrets • Name calling • Cursing • Remarks that are harsh, coercive, threatening, intimidating, demeaning, or humiliating • Belittling • Derogatory remarks about any youth or his/her family or friends

C. One-on-One Interactions (including tutoring/private coaching)

Most abuse occurs when an adult is alone with a youth in a non-public setting. The City aims to eliminate or reduce these situations and prohibits Staff from engaging in private one-on-one interactions with youth unless approved in advance by the program supervisor. This includes scheduled tutoring and/or private coaching sessions, whether occurring during or outside regular program hours, which must comply with all of the following:

- a. Staff must have program supervisor approval for any tutoring or private coaching sessions;
- b. tutoring and private coaching sessions must be scheduled through the program, not independently, and must occur at a program-approved location;
- c. program supervisors must keep a schedule of private tutoring and coaching sessions, which should include times, youth involved, and location of the sessions.

In those situations where private one-on-one interactions (including tutoring and/or private coaching sessions) are approved in advance, Staff should observe the following additional guidelines when engaging in the approved interactions:

Additional Guidelines for Approved Private One-on-One Interactions

- Unless the program supervisor has agreed that greater confidentiality is absolutely necessary to the service being provided (for example, individual therapy that requires privacy for confidential communications):
 - Meet in a public place where you are in full view of others (e.g., a visible section of a library or gymnasium) or, if meeting in a room or office, leave the door open and ensure that you can be easily observed by individuals in the adjoining public area.
 - Before the meeting, inform other adult Staff that you will be alone with a youth and ask them to randomly drop in and, after the meeting, inform the other adult Staff that the meeting has been completed.
- If the program supervisor has agreed that greater confidentiality is absolute necessary to the service being provided (for example, individual therapy that requires privacy for confidential communications), before the meeting, inform other adult Staff that you will be alone with a youth and after the meeting inform the other adult Staff that the meeting has been completed.
- Avoid any physical acts of affection that might be misinterpreted. Limit any physical acts of affection to brief pats on the shoulder, high-fives, and handshakes.
- At the conclusion of the meeting, immediately: (a) notify the program supervisor that the meeting has concluded; (b) report to the program supervisor and document any unusual occurrences during the meeting, including, but not limited to: any disclosures by the youth of any instances of abuse or maltreatment; any behavior problems and how they were handled; any injuries and how they were addressed; and any interactions that might be misinterpreted as inappropriate.

D. Off-site Contact

Many cases of abuse occur off-site and outside of regularly scheduled activities. To avoid this risk, the City prohibits Staff interactions with youth outside of regularly scheduled program activities unless the interaction is of an appropriate type and is approved in advance by the program supervisor. City standards for appropriate off-site contacts (which may occur with advance program supervisor approval and parental approval) and inappropriate off-site contacts (which are absolutely prohibited and cannot be approved by program supervisors, regardless of whether parents approve or not) are as follows:

<i>Appropriate Outside Contact</i>	<i>Inappropriate Outside Contact</i>
<ul style="list-style-type: none"> • Taking groups of youth on a program-related outing (parental approval and a minimum of two Staff or the number of Staff required to satisfy the program standard Staff/youth ratio, whichever is greater, with at least one staff employee, are required) • Attending program-related sporting activities with groups of youth (parental approval and a minimum of two Staff or the number of Staff required to satisfy the program standard Staff/youth ratio, whichever is greater, with at least one staff employee, are required) • Visiting a youth at the youth’s home for program-related reasons, with the parents present at all times 	<ul style="list-style-type: none"> • Taking one youth on an outing • Visiting a youth, whether in the youth’s home or elsewhere, without a parent or approved adult guardian present • Hosting one or more youth in the home of Staff • One or more youth spending the night with Staff • Transporting youth in a personal vehicle (except in a true emergency situation with prior notice to the program supervisor wherever practical and, if not practical, notice to the program supervisor as soon as practical)

E. Electronic Communications and Use of Electronic Communication Devices

Any private electronic communication between Staff and youth, including private communications through social media (e.g., Facebook, Instagram, Snapchat) is prohibited. All electronic communication between Staff and youth must be publicly viewable (i.e., accessible to program supervisors and the youth’s parents) and/or copied to a program supervisor and/or the youth’s parents. In addition, all electronic communications between Staff and youth must comply with the guidelines for verbal interactions set forth in section B above.

The following are examples of appropriate and inappropriate electronic communication:

<i>Appropriate Electronic Communication</i>	<i>Inappropriate Electronic Communication</i>
<ul style="list-style-type: none"> • Sending and replying to emails and text messages from youth ONLY when copying a program supervisor and/or the youth’s parents • Communicating through “organization group pages” on Facebook or other approved public forums 	<ul style="list-style-type: none"> • Posting harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning or humiliating comments on social media sites • Posting sexually oriented comments on social media sites • Private emails or text messages between Staff and youth (whether using Staff’s personal email or phone or a City-issued email or phone) • Posting pictures of program participants on any non-program social media sites • “Friending” or messaging youth on social media sites, through online gaming sites, or through other online mechanisms • Providing youth with a personal email address, personal phone number, or other personal contact information • Calling youth at home or on their cell phone, except for program related purposes

Use of electronic communication devices (whether personal or provided by the City) to engage in any inappropriate electronic communication with a program youth shall be grounds for discipline up to and including termination of employment.

F. Gift Giving

Molesters routinely groom youth by giving gifts, thereby endearing themselves to the youth, and instruct the youth to keep the gifts a secret, thereby teaching the youth to keep secrets from the youth’s parents. For these reasons, Staff are prohibited from giving gifts (including gifts of food) to any youth. This prohibition applies even if Staff believe the items they are giving to a youth are needed by that youth. Thus, for example, even if Staff believes a youth needs shoes, clothing, or food, Staff may not personally provide the youth with shoes, clothing, or food. Any gifts to youth must be approved by and come from the program, not individual Staff.

II. Monitoring and Supervision

When Staff are adequately supervised, potential offenders are less likely to act on their impulses because they face detection. When youth are adequately supervised, they too are less likely to engage in inappropriate interactions with others. Similarly, the physical plant must be monitored, particularly out-of-the-way locations or locations that might permit an offender undue access to or privacy with a youth. Set out below are standards for programs to follow to ensure adequate monitoring and supervision.

A. Facility Monitoring

Building architecture can increase or mitigate the risk of an incident or accident. Because most incidents of abuse occur in private, to the extent privacy is managed, risk is managed. To ensure that all of the locations are properly and consistently monitored, the City's Child Protection Officer (or designee as approved by the Child Protection Committee) shall conduct regular reviews of all locations used by the program.

B. General Supervision

Programs must put in place general supervision procedures that comport with the following:

Supervisor Visits to Youth Programs: Supervisors will regularly (not less than quarterly) visit all youth programs to ensure that all activities are well- managed and that youth policies are observed by all in attendance.

Check-In/Roll Call Procedures: Each program must put in place procedures (which will be site-specific) to monitor and document who has access to youth while the program is providing services to youth. For some programs, this may require a facility check-in sheet at or near the facility's entrance. For other programs, this may require a program instructor to maintain a roll-call of participants with spaces for volunteers and others assisting with the program to sign in. Each program will need to consider how best to control and limit access to youth during program participation and how best to monitor and document those having such access.

Staff-to-Youth Ratios- Each program will establish and follow requirements for Staff-to-youth ratios that are appropriate to the goals of the program and the design of the program area and that comply with any local licensing requirements and best practice guidelines for the particular type of program. The Staff-to-youth ratio should be adjusted (in accordance with any local licensing requirements and best practice guidelines) for programs that serve youth with special needs.

Mixed Age Groups- In most incidents involving one youth abusing another youth, the youth are from different age groups. Each program is responsible for establishing specific guidelines for additional monitoring and supervision of activities that involve youth from different age groups. Staff must be made aware that close line of sight supervision is required when monitoring programs that mix age groups.

C. Monitoring Youth in Program Facilities

Programs must implement practices for monitoring program youth that comply with all of the following:

1. A parent or legal guardian must complete a participant application which includes identifying information, the youth's date of birth, and emergency contact information.
2. Programs should establish procedures (e.g., sign-in/sign-out sheets, instructor roll calls) sufficient to ensure that: (a) for all times youth are under direct supervision (see below), the program has a record of the youth who are participating in the activity that is subject to direct supervision; and (b) for all times youth are using authorized areas within a facility under indirect supervision (see below), the program has a record of the youth who are using the authorized areas within the facility.
3. Programs must establish procedures to ensure that, while in the program facility, youth are supervised, either directly or indirectly.
 - a. Direct supervision: The program may offer structured, scheduled activities like basketball tournaments, swimming classes, arts and crafts activities, etc. These activities should have one or more Staff assigned to lead and supervise, in accordance with the program's Staff-to-youth ratio requirements.
 - b. Indirect supervision: The program may designate certain facility areas as authorized areas. For example, authorized areas could include a gymnasium, a game area, a playground area, or a classroom for doing homework. Authorized areas must be easily visible and routinely and systematically checked by Staff. Youth should know that they will be supervised by Staff at all times, and all Staff should know which areas are authorized for indirect supervision. Programs must implement indirect supervision standards for all authorized areas that include at least the following: (i) how frequently and for how long authorized areas will be monitored by Staff; (ii) specific assignments of Staff to have supervision responsibilities over the authorized areas; and (iii) documentation of the scheduled periodic monitoring of these areas.
 - c. Programs must ensure that Staff are on notice of the need for close line of sight supervision of any group that includes youth below the age of 12, or 7th grade.
4. Programs must establish procedures for monitoring high risk areas (e.g., bathrooms, locker rooms, unused rooms, and other high risk areas identified by the periodic program site location review) that include at least: (a) designation of specific Staff to supervise these areas; (b) scheduled periodic monitoring of these areas; and (c) requirements for Staff to contemporaneously record when and for how long they monitor these areas.
5. Programs must require all program Staff to wear nametags or other identifying clothing so that youth can easily recognize them as Staff. Where possible, nametags or other identifying clothing should enable easy differentiation among staff employees, staff volunteers, and contractors.

6. Programs must train all Staff:
 - a. to greet youth that enter the facility; to direct youth to structured activities or authorized areas; and, to redirect youth who are not in an authorized area or who are not participating in a structured activity;
 - b. to be aware of the risks involved with mixing age groups and how to monitor activities involving mixed age groups;
 - c. to routinely monitor high risk areas even if not specifically designated to do so.

D. Monitoring High Risk Activities

1. Bathrooms

Many incidents of youth-to-youth abuse occur in bathrooms. Programs must establish procedures for monitoring bathroom activities that comply with the following:

- a. For “Group Bathroom Breaks”:
 - Require Staff to take groups of two or more youth to the bathroom.
 - An adult Staff member should enter and check the bathroom before youth are allowed to enter.
 - If the bathroom only has one stall, only one youth should enter the restroom while the others wait outside with Staff.
 - If there are multiple stalls, only send in as many youth as there are stalls.
 - Minimize youth of different ages using the bathroom at the same time.
 - Require Staff to stand outside the bathroom door but remain within earshot with the door ajar.
- b. For single use restrooms:
 - Require youth to ask permission to use the bathroom.
 - Require all Staff to frequently check bathrooms.
- c. To the extent practical, prohibit Staff from using the bathroom at the same time as youth. If this cannot be done due to facility limitations, ensure that bathroom doors remain open while Staff use a stall.

If presence in a stall with a youth is required (e.g., to assist a youth with a disability), Staff must keep the door to the stall open with another Staff in sight.

2. Locker Rooms

Programs must establish locker room procedures that comply with the following:

- a. Staff must stand within earshot of the locker room when in use by youth.

- b. Staff must intermittently and briefly check inside the locker room so youth know the locker room is monitored.
- c. Discourage the use of locker rooms by youth of different ages at the same time; if youth of different ages must use the locker room at the same time, increase the frequency of checks inside the locker room.
- d. Prohibit the use of locker room horseplay such as towel snapping.
- e. When possible, arrange lockers to minimize unnecessary privacy.
- f. When possible, require Staff and youth to use the locker room at different times.

3. Showers

Programs must establish procedures for showers that comply with the following:

- a. Staff and youth must shower at different times. Shower schedules should be created to permit supervision of youth while Staff shower.
- b. While youth shower, at least one Staff should stand in the bathroom doorway and within earshot of the youth.
- c. Ensure that only one youth is in each shower. Where possible, programs should use shower curtains that do not go all the way to the floor, so that Staff can easily see how many youth are in each shower stall.

4. Transition Times and Free Times

Transition times and free times pose a high risk for incidents because during these times, Staff may not be assigned a particular group of youth to supervise. To decrease the risk of incidents, programs must establish procedures for transition times and free times that comply with the following:

- a. Require youth to remain in line-of-site of Staff at all times.
- b. Specify Staff-to-youth ratio for these times.
- c. Define authorized areas for use during these times.
- d. Ensure that Staff are assigned specific zones within the authorized areas to supervise.
- e. Ensure that bathroom procedures continue to be followed during these times.
- f. Require supervisors to conduct periodic check-ins and sweeps of the entire activity area, including both authorized and non-authorized areas.

5. Playground Activities

Programs must establish procedures for playground activities that comply with the following:

- a. Require youth to remain in line-of-site of Staff at all times.
- b. Specify Staff-to-youth ratios for these activities.
- c. Define specific narrow boundaries around the playground area to define the authorized area for use.
- d. Provide Staff with specific instructions on how to monitor barriers to supervision (such as storage sheds, playhouses, tunnels, and shrubs).
- e. Ensure that Staff are assigned specific zones within the authorized area to supervise.
- f. Ensure that bathroom procedures continue to be followed during playground activities.
- g. Require supervisors to conduct periodic check-ins and sweeps of the entire playground area, including both authorized and non-authorized areas.

6. Transportation Activities

Programs must establish procedures for transportation activities that comply with the following:

- a. Require written parent permission forms and medical releases from all youth on the trip. Staff must take these permission forms and medical releases with them on the trip.
- b. Require Staff to have a list of youth on the trip. Require Staff to take roll when boarding the bus/other transport, when leaving the bus/other transport, and periodically throughout the trip.
- c. Specify Staff-to-youth ratios. When possible, do not count the driver in the supervision ratio.
- d. Require Staff to sit separately and in seats that provide sight lines throughout the bus/other transport and permit maximum supervision.
- e. Prohibit drivers from making unauthorized stops.
- f. Require Staff to document the beginning and ending time of the trip and the mileage, names of youth being transported, and destination.
- g. Require written documentation of any unusual occurrences during transportation.

When public transportation is used, in addition to the procedures listed above, procedures should comply with the following:

- a. Require youth to remain in one area of the bus/other public transport, if possible.
- b. Require Staff assigned to a group to remain with that group on the bus/other public transport in a position where all youth in the group can be observed.
- c. Require Staff to take a head count or call roll immediately after entering and leaving the bus/other public transport.
- d. Staff should never transport youth in non-organization vehicles except in an emergency situation. If such transport occurs: (a) the youth must be transported directly to the emergency destination without any unauthorized stops; (b) Staff must immediately notify administrators in writing, identifying the youth transported, the beginning and ending times of transport, the mileage, the emergency that necessitated the transport, and any unusual events that occurred during the transport.

7. Off-Site Activities

Programs must establish procedures for off-site activities that comply with the following:

- a. Staff must obtain written supervisor approval for all off-site activities.
- b. Staff must obtain written parental approval for all off-site activities.
- c. Staff-to-youth ratios must be appropriate to off-site activities (these may vary depending on the particular off-site activity).
- d. Staff and youth must be easily identifiable to each other while engaged in the off-site activity.
- e. Include specific bathroom and locker room procedures as applicable to the off-site activity.
- f. Require strict compliance with transportation activity requirements above while traveling to and from the off-site activity and while engaged in the off-site activity.
- g. A supervisor must observe the off-site activities at scheduled times and random intervals.
- h. Require adoption of additional procedures as appropriate to a particular location and type of activity (for example, Amusement parks, Water Parks, Arcades), and ensure that Staff are advised of any additional procedures. Such procedures may include, but are not limited to, assigned groups, scheduled itineraries, continuous roll calls or head counts, and group bathroom breaks.

8. Overnight Activities

Overnight stays present unique risks to youth and Staff because 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 Staff.

Programs must establish procedures for overnight activities that comply with the following:

Supervision Guidelines:

- a. All overnight activities must be documented and approved in writing by the program manager, program administrator, or division manager.
- b. The program manager, program administrator, or division manager must regularly and randomly observe overnight activities on a scheduled and periodic basis.
- c. The program manager or program administrator must appoint a “lead” Staff to supervise the overnight.
- d. The program manager or program administrator and lead Staff must determine the appropriate Staff-to-youth ratios before the overnight activity and schedule Staff accordingly.
- e. The lead Staff must conduct a pre-trip meeting with all Staff assigned to the trip to discuss and review the unique risks of overnight trips, unique elements of the specific overnight trip, and specific policies and procedures that govern overnight trips.
- f. Provide parents with written information about the overnight activity and the name and contact information for the lead Staff. Require all parents to sign a permission slip for their children to attend the overnight. Lead Staff should consider conducting a pre-trip meeting with parents as well.

Overnights at the Program Facility:

- a. Physical boundaries within the program facility, including authorized and unauthorized areas, must be clearly defined and explained to the youth.
- b. At least two Staff must be present throughout the overnight stay. Assign each Staff to a specific group of youth to supervise. Each Staff must maintain a roll sheet that lists all of the youth in his or her group and must conduct head counts and roll checks routinely throughout the evening.
- c. Assign Staff to high risk areas within the program facility, such as the bathrooms, entrances and exits, and hallways. If it is not possible to assign specific Staff to these areas, assign specific Staff to conduct periodic facility “walk-throughs” that include these areas.

- d. With regard to sleeping arrangements, separate male and female youth into separate rooms and post Staff at the entrances and exits to these rooms. If this is not feasible, separate male and female youth by as much space as possible.
- e. Require Staff to perform periodic random room checks. When performing room checks, Staff should always go in pairs.
- f. All Staff are to be on duty at night until an hour after lights out and all youth are quiet.

Overnights Away from the Facility:

- a. Overnight stays at private homes are prohibited unless approved in advance in writing by the program manager and program administrator.
- b. Physical boundaries at the off-site location, including authorized and unauthorized areas, must be clearly defined and explained to the youth.
- c. At least two Staff must be present throughout the overnight stay. Assign each Staff to a specific group of youth to supervise. Each Staff must maintain a roll sheet that lists all of the youth in his or her group and must conduct head counts and roll checks routinely throughout the evening.
- d. Assign Staff to high risk areas within the off-site location, such as the bathrooms, entrances and exits, and hallways. If it is not possible to assign specific Staff to these areas, assign specific Staff to conduct periodic facility “walk-throughs” that include these areas.
- e. With regard to sleeping arrangements, separate male and female youth into separate rooms and post Staff at the entrances and exits to these rooms. If this is not feasible, separate male and female youth by as much space as possible.
 - o If in a cabin type setting, Staff should be placed in bunks to maximize supervision around the cabin, provide sight lines to all exits, and decrease the chances of youth sneaking out.
 - o In hotels/motels, assign youth to rooms based on sex and age. Staff should have their own rooms. If Staff must share rooms with youth, Staff must have their own beds and never change in front of youth.
- f. Require Staff to perform periodic random room checks. When performing room checks, Staff should always go in pairs.
- g. All Staff are to be on duty at night until an hour after lights out and all youth/rooms are quiet.

9. Teen Leadership Program/Counselors in Training Program

Staff must understand that older youth who participate in teen leadership programs are still youth and not Staff. Even though they are often given more responsibility, teens in the leadership programs must be provided with guidelines regarding appropriate behavior, and then supervised accordingly.

Programs must establish procedures for teen leadership programs that comply with the following:

- a. Create a screening process for teen leaders that includes
 - A standard application
 - An interview
 - References (from teachers, counselors, family friends, etc.)
- b. Train teen leaders in their roles in programs and on program policies about appropriate and inappropriate interactions. This training should include the following information:
 - Appropriate and inappropriate physical and verbal interactions.
 - The importance of maintaining behavioral boundaries between teen leaders and younger youth and between teen leaders and Staff.
 - Prohibiting teen leaders from being one-on-one with youth.
 - Prohibiting teen leaders from escorting youth to the bathrooms.
 - Prohibiting teen leaders from assisting youth with changing their clothes.
- c. Create a system to monitor the teen leaders.
 - Designate specific Staff to be in charge of the teen leadership program and its participants.
 - Require teen leaders to wear clothing or lanyards that identify them as leaders-in-training and differentiate them from both Staff and other program youth.
 - Require a supervisor to conduct regular periodic check-ins with teen leaders and their Staff supervisors.
 - Require teen leaders to keep a log documenting their program activities and any problems they encounter. The Staff supervisor should review these logs on a regular periodic basis.

EXHIBIT C:
STANDARDS FOR RESPONDING TO SUSPECTED
ABUSE OR NEGLECT OR SUSPICIOUS OR
INAPPROPRIATE CONDUCT

Standards for Responding to Suspected Abuse or Neglect or Suspicious or Inappropriate Conduct

The following standards apply to all staff employees, staff volunteers, and contractors (collectively “Staff”) for any City-managed youth program. All Staff are expected to act conscientiously to exemplify the highest ethical standards. Accordingly, all Staff must at all times comply with all of the following standards for responding to suspected abuse or neglect or suspicious or inappropriate conduct.

A. Responding to Suspected Child Abuse or Neglect

1. California’s Mandatory Reporting Requirements for Suspected Abuse or Neglect

California law defines mandated reporters to include any “employee of a public or private organization whose duties require direct contact and supervision of children.” California Penal Code 1165.7(a)(8). California law requires such employees to make a report to a county welfare department, here the Department of Children and Family Services (“DCFS”) or a local police department, here the Santa Monica Police Department (“SMPD”), whenever the mandated reporter “within the scope of his or her employment, has knowledge of or observes a child whom the mandated reporter knows or reasonably suspects has been the victim of child abuse or neglect.” California Penal Code 11166(a), 11165.9. The initial report must be made immediately, or as soon as is practicably possible, by telephone, and a written report must be prepared and electronically transmitted to DCFS or SMPD within 36 hours. California Penal Code 11166(a). DCFS and SMPD have obligations to cross-report to each other. California Penal Code 11166(j), (k).

Volunteers of public or private organizations whose duties require direct contact with and supervision of children generally are not mandated reporters, but are “encouraged to obtain training in the identification and reporting of child abuse and neglect and are further encouraged to report known or suspected instances of child abuse or neglect” just as employees are required to do by law. California Penal Code 11165.7(b).

As a matter of policy, the City will provide all Staff with training regarding the mandated reporting duties imposed by California law, and will expect all Staff to make reports of suspected child abuse or neglect in accordance with the requirements imposed by California law on mandated reporters.

For purposes of mandatory reporting requirements, California Penal Code 11165.6 defines “child abuse or neglect” to include “physical injury or death inflicted by other than accidental means upon a child by another person, sexual abuse as defined in Section 11165.1, neglect as defined in Section 11165.2, the willful harming or injuring of a child or the endangering of the person or health of a child, as defined in Section 11165.3, and unlawful corporal punishment or injury as defined in Section 11165.4.”

Section 11165.1 defines sexual abuse as including, but not limited to, all of the following: penetration, however slight, of the vagina or anal opening of one person by the penis of another person; sexual contact between the genitals or anal opening of one person and the mouth or tongue of another person; intrusion by one person into the genitals or anal opening of another person, including the use of an object for this purpose (with an exception for acts performed for a valid medical purpose); intentional touching of the genitals or intimate parts, including the breasts, genital area, groin, inner thighs, and buttocks, or the clothing covering them, of a child, or of the perpetrator by a child, for purposes of sexual arousal or gratification; intentional masturbation of the perpetrator’s genitals in the presence of a child; depicting a child in, or accessing through any electronic or digital media, any image in which a child is engaged in an act of obscene sexual conduct; sexual trafficking of a child; and the provision of food, shelter, or payment to a child in exchange for the performance of any sexual act described above.

Section 11165.2 defines neglect to mean “the negligent treatment or the maltreatment of a child by a person responsible for the child’s welfare under circumstances indicating harm or threatened harm to the child’s health or welfare” including “both acts and omissions on the part of the responsible person.” It includes both the intentional and negligent failure by a person having care or custody of a child to “provide adequate food, clothing, shelter, medical care, or supervision,” whether or not any physical injury to the child has occurred.

Section 11165.3 defines the willful harming or injuring of a child or the endangering of the person or health of a child to mean “a situation in which any person willfully causes or permits any child to suffer, or inflicts thereon, unjustifiable physical pain or mental suffering, or having the care or custody of any child, willfully causes or permits the person or health of the child to be placed in a situation in which his or her health is endangered.” Willful harming can occur without actual physical injury.

Section 11165.4 defines unlawful corporal punishment or injury to mean “a situation where any person willfully inflicts upon any child any cruel or inhuman corporal punishment or injury resulting in a traumatic condition.”

If Staff have a question whether conduct observed or alleged rises to the level of child abuse or neglect as defined by these statutes, they should report the conduct to and consult with a supervisor, program manager, program administrator, or division manager. If after this consultation Staff still have a question whether conduct observed or alleged rises to the level of child abuse or neglect as defined by these statutes, Staff should report the conduct to DCFS for further guidance. Supervisors are prohibited by law from impeding Staff from reporting to DCFS. California Penal Code 11166(i). Supervisors also may not direct Staff to allow the supervisor to report to DCFS instead of Staff. *Id.*

2. Staff Response to Suspected Abuse or Neglect:

As required by mandated reporting laws and City policy, all Staff must immediately (or as soon as practically possible) report any suspected abuse or neglect of a youth—whether on or off organization property or whether perpetrated by Staff or others—to DCFS or SMPD. If the situation is urgent or there is an immediate safety threat, Staff should call SMPD. A person who mistakenly reports suspected abuse or neglect is immune from civil or criminal liability unless it can be proven that the reporter knew the report was false or that the report was made with reckless disregard for its truth or falsity. California Penal Code 11172.

For Los Angeles County, a report to DCFS may be made by phone at 800-540-4000; the required follow-up written report to DCFS should be made online using the Suspected Child Abuse Report (SCAR) Form (Cal DOJ Form BCIA 8572) at <https://mandreptla.org/cars.web/>. A sample of the form is attached to these Standards as Attachment 1. Staff may wish to complete the form before making the required phone report so that all information is available during the call.

In addition to reporting to DCFS or SMPD, Staff are required to report any suspected or known abuse or neglect of youth, whether perpetrated by Staff or others, directly to a program supervisor 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 or neglect may be made confidentially to the following:

- a. Immediate supervisor
- b. Program Manager and/or Program Administrator
- c. Division Manager

Additional Guidelines for Staff Response to Suspected Abuse or Neglect

- If you witness abuse or neglect, interrupt the behavior immediately.
- If abuse or neglect 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, or as soon as practicably possible, report the allegation or incident to DCFS or SMPD by phone and to your program supervisor. Be sure to get a case number and the name and contact information of the DCFS or SMPD representative with whom you speak.
- Be sure to document the incident, disclosure, or any circumstances causing your suspicion of abuse or neglect. 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, program manager, program administrator, or division manager in a timely manner.
- Check back to make sure appropriate steps were taken. If not, report again to your supervisor, program manager, program administrator, or division manager.

3. Supervisor and Department Response to Suspected Abuse or Neglect:

If a supervisor, program manager, program administrator, or division manager receives a report of abuse or neglect, they must do the following:

Guidelines for Supervisor and Department Response to Suspected Abuse or Neglect

- First, determine if the youth is still in danger and if so, take immediate steps to prevent any further harm.
- Report to the next level of management and determine the appropriate level of management (supervisor, program manager, program administrator, or division manager) to respond to the report.
- 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.
- Make sure that a report was made to DCFS or SMPD, and, if not, contact DCFS or SMPD, which are the agencies to which mandatory reports must be directed. Make sure you get a case number and the name and contact information of the SMPD Officer with whom you speak.
- If the alleged abuse or neglect involves Staff, review the file of the Staff who has been reported to determine if similar complaints were reported.

- Work with your program administrator, division manager, or department leadership and the City’s Human Resources Department to determine what action with respect to the accused Staff should be taken while the investigation is completed.
- Advise the person who reported the behavior that the report is being taken seriously.
- Ensure that department leadership is advised of the allegation or incident and the steps taken in response.
- Department leadership shall ensure that a summary of the report and the actions taken in response to the report is provided to the Child Protection Officer for review by the Child Protection Officer and the Child Protection Committee. A form for this purpose is attached to these standards as Attachment 2.

4. City Response (Child Protection Officer and Child Protection Committee):

- Guidelines for Organizational Response*
- Review the need for increased supervision.
 - Review the need for revised policies or procedures.
 - Review the need for additional training.
 - Review the need for discipline up to and including termination in accordance with the City’s progressive disciplinary process.
 - Advise the Department that reported the issue of any additional actions that should be taken.

B. Responding to Suspicious or Inappropriate Conduct

Because the City is dedicated to maintaining zero tolerance for abuse, it is imperative that all Staff actively participate in the protection of youth. If Staff observe any suspicious or inappropriate conduct or violations of standards on the part of other Staff, it is their personal responsibility to immediately report their observations.

- Examples of Suspicious or Inappropriate Conduct Between Staff and Youth*
- Violation of the abuse prevention standards described in the City’s Standards for City-Managed Youth Programs
 - Seeking private time or one-on-one time with youth
 - Buying gifts for individual youth
 - Making suggestive comments to youth
 - Picking favorites among youth

- Communicating privately with youth on social media or through email or phone (whether using Staff’s personal email or phone or a City-issued email or phone)

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

The reporting procedures below apply whether or not the conduct observed rises to the level of child abuse or neglect, as defined by California’s mandatory reporting statutes. What constitutes child abuse or neglect for purposes of triggering mandatory reporting requirements under California’s mandatory reporting statutes is discussed in Section A above, which lays out the additional mandatory reporting requirements (including an immediate report to DCFS or SMPD) when Staff become aware of conduct they suspect rises to the level of child abuse or neglect (as defined by statute).

Reporting conduct that does not rise to the level of suspected child abuse or neglect:

1. Staff Response:

If Staff observes suspicious or inappropriate conduct or violations of standards by another Staff or by non-Staff, or receives a report of such behavior from either Staff or non-Staff, Staff must do the following:

Guidelines for Staff Response to Suspicious or Inappropriate Conduct or Standards Violations

- Interrupt the behavior immediately.
- Report the behavior to their supervisor, the program manager, program administrator, division manager, or department leadership.
- If the report is about a supervisor, make the report to the program manager or higher level of management. If the report is about a program manager, make the report to the program administrator or higher level of management. In general, the report should be made a level of management above that of the individual to whom the report pertains.
- Document the report but do not conduct an investigation.
- Keep reporting until the appropriate action is taken.

2. Supervisor and Department Response:

If a supervisor, program manager, program administrator, or division manager receives a report of suspicious or inappropriate behavior or violations of standards, they must do the following:

Guidelines for Supervisor and Department Response to Suspicious or Inappropriate Conduct or Standards Violations

- Report to the next level of management and determine the appropriate level of management (supervisor, program manager, program administrator, or division manager) to respond to the concern.
- Determine the appropriate response based on the report.
- If the report relates to Staff, review the file of the Staff who has been reported 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 child abuse or neglect, contact DCFS or SMPD 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.
- Ensure that Department leadership is advised of the report and the actions taken in response to the report.
- Department leadership shall ensure that a summary of the report and the actions taken in response to the report is provided to the Child Protection Officer for review by the Child Protection Officer and the Child Protection Committee. A form for this purpose is attached to these standards as Attachment 2.

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

- a. Increase monitoring or supervision of Staff or the program.
- b. If standards violations with youth by Staff are confirmed, Staff must be subject to disciplinary action up to and including termination and prosecution. Disciplinary action will follow the City's progressive disciplinary process in consultation with Human Resources.
- c. If more information is needed, interview and/or survey other Staff, youth, and parents.

3. City Response (Child Protection Officer and Committee):

Guidelines for Organizational Response

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

- Review the need for discipline up to and including termination in accordance with the City’s progressive disciplinary process.
- Advise the Department that reported the issue of any additional actions that should be taken.

C. Responding to Youth-to-Youth Sexual Abuse and Sexual Behavior

The thought that one youth may sexually abuse another youth does not occur to many people. Unfortunately, abuse between peers has increased significantly over the past few years.

1. Youth-to-Youth Interactions:

Most serious incidents of youth-to-youth 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. Accordingly, the following high-risk youth-to-youth interactions are prohibited during program participation and must be promptly addressed and reported by Staff:

Prohibited High-Risk Youth-to-Youth Interactions

- Hazing
- Bullying
- Derogatory name-calling
- Games of Truth or Dare
- Singling out one child for different treatment
- Ridicule or humiliation

Most serious incidents of youth-to-youth sexual abuse are preceded by inappropriate sexual behaviors. Interrupting these behaviors early and establishing and communicating standards of conduct can keep the program environment safe. Accordingly, the following youth-to-youth sexual behaviors are prohibited during program participation and must be promptly addressed and reported by Staff:

Prohibited Youth-to-Youth Sexual Behaviors

- Inappropriate touching
- Exposing body parts
- Using inappropriate sexual language
- Making threats of sexual activity
- Engaging in sexual activity

2. Staff Response:

If Staff observe prohibited youth-to-youth high-risk interactions or prohibited youth-to-youth sexual behaviors, they are instructed to follow these guidelines:

Guidelines for Staff Responding to Youth-to-Youth High-Risk Interactions or Sexual Behaviors

- If you observe high-risk interactions or sexual behaviors between youth, you should immediately separate them.
- Calmly explain that such interactions/behaviors are not permitted and separate the youth.
- Notify your supervisor and provide a summary of what you observed and how you responded.
- Follow your supervisor's instructions regarding notifying the authorities and informing the parents of the youth involved.
- If you believe the conduct rose to the level of suspected sexual abuse, comply with the reporting requirements for suspected abuse set forth in Section A above.

3. Supervisor and Department Response:

If a supervisor, program manager, program administrator, or division manager receives a report of prohibited you-to-youth high-risk interactions or prohibited youth-to-youth sexual behaviors, they should do the following:

Guidelines for Supervisor and Department Response to Youth-to-Youth High-Risk Interactions or Sexual Behaviors

- Report to the next level of management and determine the appropriate level of management (supervisor, program manager, program administrator, or division manager) to respond to the concern.
- Meet with Staff who reported the high-risk interaction or sexual behavior to gather information.
- Confirm that the youth involved have been separated or placed under increased supervision.
- Review the steps taken by Staff.
- Review the incident report to confirm it is accurate and thorough.
- Meet with parents of the youth involved.
- Determine actions needed to make sure there is no recurrence, including assessing the suitability of the program for the youth involved and determining whether removal from the program is appropriate.
- Notify the proper authorities.
- Develop a written action plan in response to the incident.

- Advise the Staff that reported the behavior that the report is being taken seriously.
- Ensure that department leadership is advised of the report and the actions taken in response to the report. A form for this purpose is attached to these standards as Attachment 2.

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

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

4. City Response (Child Protection Officer and Child Protection Committee):

After the internal review of the high-risk youth-to-youth interaction or youth-to-youth sexual behavior, the organization 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 the organization.
- Advise the department that reported the behavior of any additional actions that should be taken.