

Best Practices in Safeguarding Children:
Report on Diocese of Wilmington's *For the Sake of God's Children*

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April 3, 2012

Chapter I: Purpose and Scope of the Report

Background of Appointment

On April 27, 2011, I was contacted (via email) by Sister Suzanne Donovan, Director of Human Resources at the Diocese of Wilmington (hereinafter referred to as DOW). Sr. Donovan also serves as the Coordinator of the Safe Environment Program, and she asked if I would be amenable to discussing the possibility of conducting an assessment of the Safe Environment Program. A few days later, I spoke with Sr. Suzanne Donovan and Msgr. J. Thomas Cini (Vicar General for Administration for the Diocese of Wilmington). During that conversation, they described the policies and programs they had developed, summarized in the *For the Sake of God's Children* program. They also explained that as part of the non-monetary terms of its Bankruptcy Settlement, DOW had agreed to retain a Child Protection Consultant charged with evaluating these policies and programs. I expressed interest in serving in that capacity, and in a letter dated May 5, 2011, Msgr. Cini asked to submit my name as a possible candidate for this position, and I agreed. On August 24, 2011 I received a letter from Msgr. Cini advising me that DOW was about to enter into preliminary discussions with the Creditors Committee regarding the Child Protection Consultant position and again sought permission to submit my name as one of the candidates, to which I agreed.

In a letter dated October 28, 2011, Msgr. Cini informed me that I had been selected as Child Protection Consultant, and on November 21, 2011 I sent a proposed Scope of Work, timelines and terms document to him for review and approval. After a few modifications, a final agreement was prepared and sent to me on January 3, 2012. That Memorandum of Agreement, outlining my duties as Child Protection Consultant, was signed and returned to Msgr. Cini on February 2, 2012. Specific duties include evaluating and making public recommendations with respect to the following:

- Training about child maltreatment (including sexual abuse) provided to the seminarians;
- Mandatory reporting training (for child maltreatment) required of all employees; and
- *Keeping Our Promises* (child abuse prevention curriculum intended to educate children, young people, and their parents).

In preparation for my review, I received on November 8, 2011 from Sr. Suzanne Donovan all the materials currently in use for the Safe Environment Program: *For the Sake of*

God's Children (FSGC). Those materials included: a) Program Manual; b) school-based curriculum (*Keeping Our Promises*); c) Policy manual containing all related policies for implementation; d) Catholic Youth Ministry Manual; e) Training outlines/materials for all instructional groups; f) Program Manager's Manual: How to Manage FSGC; and g) two DVDs, one entitled "Child Abuse..How to see it...How to stop it" and the other labeled "FSGC DVD 2011" which is a power-point slide show covering the history and description of *For the Sake of God's Children*. In addition, a power-point slide show entitled "An Environment of Faith: An Environment of Safety" (Spring, 2012) was reviewed. On March 30, 2012 I received electronic copies of informational brochures (for parents, staff, and volunteers) along with additional information about the Health curriculum. These are DOW's safe-environment programs, policies, and procedures designed to prevent the sexual abuse of children and also to respond effectively when allegations of abuse are made. Note that with the exception of the Health curriculum, I did not review the content of other related curricula (e.g., Family Life, Religion, Biology).

Overview of Review Process

In the first section of this report I provide background into clergy sexual abuse, reviewing recent research conducted in this setting. I then view this knowledge base through the lens of the Situational Crime Prevention (SCP) framework and use the SCP heuristic to frame my review of DOW's programs. I also review the research on CSA occurring in other youth-serving organizations (e.g., schools, clubs, sports) along with the guidelines these organizations have developed to prevent CSA in order to identify common risk-management strategies of potential use to the Church. I also reviewed faith-based standards and guidance, including Reverend Debra W. Haffner's *Balancing Acts: Keeping Children Safe in Congregations*, the National Board for Safeguarding Children's (2008) *Safeguarding Children: Standards and Guidance Document for the Catholic Church in Ireland*, and the Presbyterian Church's "*We Won't Let it Happen Here! Preventing Child Abuse in the Church.*" I also requested that a notice be placed on the DOW website informing stakeholders about the review and requesting interested parties to send me information, concerns, or recommendations relevant to current DOW policies or programs related to child safety.

Structure of the Report

The Report is comprised of seven chapters. Chapter I provides information about the purpose of the Report and background on my appointment as Child Protection Consultant. Chapter II reviews research on child sexual abuse (CSA) in the Catholic Church and includes recommendations from the team of researchers at John Jay College of Criminal Justice who conducted the two studies extensively reviewed for this Report. Chapter III examines the nature of CSA occurring in other youth-serving organizations. Using evaluation rubrics developed for this report (see Appendices A and B), I then review four components of a safe environment. Chapter IV contains the review of DOW's *Keeping Our Promises* educational program. Chapter V reviews parent-focused educational programs/materials included in *Keeping Our Promises*.

Chapter VI reviews DOW policies/procedures manual with special attention paid to Mandatory Reporting and Training. Chapter VII reviews seminarian training programs/materials specific to child maltreatment.

Chapter II: Child Sexual Abuse in Faith Communities

Faith communities offer children wonderful opportunities to develop spiritually, with the support and guidance of trusted religious leaders and youth mentors. Unfortunately, no community of faith is free from the risk of child sexual abuse. Children are vulnerable in churches, synagogues, mosques, and other types of religious institutions for several reasons:

- Faith-based institutions, by their very mission, serve youth and thus offer many opportunities for adults who are sexually attracted to children to have close intimate relationships with youth.
- In the past, many organizations inadvertently provided faith leaders with unlimited access to children and opportunities to be alone with them.
- Sexual misconduct is always a possibility in teacher-student relationships that encourage close contact, such as in the role of a spiritual leader, coach, and so on (Fibkins, 2006).
- Some authors have suggested that sexual misconduct is a possibility with celibate priests who may be searching for the close, intimate contact missing in their personal lives (Doyle, Sipe, & Wall, 2006).
- Congregations are inherently trusting, believing that those who attend church will be striving to live Christian lives (Presbyterian Church, n.d.).
- Children do not question the authority of a religious leader, particularly priests, who are viewed as God's personal representatives. "The priest's power over his victim, grounded in the erroneous belief about the nature of the priesthood, can create a toxic trauma bond between victim and perpetrator" (Plante & McChesney, 2011, p. 173), leading to considerable fear and confusion for the victim.
- Likewise, parents trust religious leaders. In reference to the Catholic Church, "Until January 2002, when this scandal erupted, priests were the men whose Roman collars conferred upon them the reflexive trust of parents who considered it an honor to have them in their homes." (Boston Globe, 2002, p. 15). The "parental reverence for the sanctity and trust-worthiness of the clerical state was powerfully transmitted to [their] children" (Isely et al., 2008).
- Until recently, few faith-based organizations implemented screening, training, and prevention initiatives, nor were there policies and procedures in place to respond to allegations of sexual abuse by members of the clergy. Instead, there was a profound

reluctance on the part of Church officials to refer complaints to civil authorities, and abusive priests were transferred from parish to parish or sent to treatment (Dunne, 2004).

The topic of child sexual abuse by Catholic priests came to the forefront in 2002 largely as a result of the case of John Geoghan, a priest in the Boston Archdiocese who was accused of abusing more than 130 children across three decades. Although his case was extreme, it served as the catalyst for intense media attention, including the series of Pulitzer prize-winning reports in the *Boston Globe* newspaper, which were later published into a book, *Betrayal: The Crisis in the Catholic Church* (Boston Globe, 2002). Questions about the abuse crisis centered around several key issues: How many priests committed such acts? How did the abuse occur? What made it difficult for the child victims to report at the time of the abuse? How did the Church respond to the alleged offenses? Prior to 2002, few researchers had systematically studied the problem of CSA by clergy.

To help answer these important questions, the United States Conference for Catholic Bishops commissioned researchers at the John Jay College of Criminal Justice to conduct two studies: one to investigate the nature and scope of child sexual abuse by priests and deacons in the United States from 1950-2002 and the second to address the causes and context of the abuse (see John Jay College, 2004, 2006). Findings from the "Nature and Scope" study (Terry, 2008) indicated that 4,392 priests (4% of total) had allegations of abuse brought against them between 1950 and 2002, and that 10,667 victims reported abuse by priests within that time period. Findings from the "Causes and Context" study showed that priests who sexually abused minors constituted a heterogeneous population, and like non-priest abusers, the majority of priests who sexually abused minors appeared to have had certain vulnerabilities to commit abuse (e.g., emotional congruence with children or adolescents), experienced increased stressors from work (e.g., having recently received more responsibilities, such as becoming a pastor), and had opportunities to abuse the children (e.g., unguarded access to minors).

John Jay College lead researcher Karen Terry and colleagues then began employing Situational Crime Prevention (SCP) framework to interpret the data. Instead of focusing on the motivation or psychological risk factors in the offender, SCP approach argues that criminologists and others should pay more attention to the criminal event, and less focus on etiological issues (e.g., individual pathology). As applied to CSA in the Catholic Church, instead of trying to understand *why* priests sexually abuse children, SCP focuses on understanding *how* crimes are successfully committed.

Data from both studies were further analyzed to determine whether CSA by priests has a situational component. In their first study, Terry and Ackerman (2008) found low levels of major diagnosable disorders among abusive priests (2% committed behavior consistent with pedophilia; 10% consistent with ephebophilia). Instead, data supported a situational component to priests' sexually abusive behavior. Data indicated that access to victims played a critical role in victim choice as well as when and in what circumstances the victims were abused.

Specifically, priests abused minors to whom they had immediate and convenient access. These were children to whom they had access and with whom they enjoyed close relationships. It was common for priests to socialize with the victim's family. Active socialization with the family occurred in one quarter of the cases of abuse, and in 80% of those cases, the socialization occurred in the home of the victim. Father Geoghan used this opportunity, as described in *Betrayal: The Crisis in the Catholic Church* (Boston Globe, 2002). "For faithful Catholic mothers, especially those struggling to raise a large family by themselves, Geoghan seemed a godsend. He was there on their doorsteps with an offer to help. He'd take their sons out for ice cream. He'd read to them at bedtime. He would pray with them beside their beds. He would tuck them in for the night, and then fondle them in their nightclothes" (p. 13).

The most common location where children (both boys and girls) were abused was in a parish residence or cleric home (41% of abusive acts). Other places where abuse took place included a church (16%), in the victim's home (12%), in a vacation house (10%), and in school (10%). Almost 18% of the abuse took place when the victim traveled alone with the priest. Victim Assistance Coordinators (VACs) in the "Nature and Scope" study discussed how abusive priests would create opportunities for the abuse by taking boys on trips (e.g., camping), at which point they would give the victims alcohol and abuse them while they were intoxicated.

In addition to evidence supporting the role of unguarded access to children, Terry and Ackerman (2008) also found evidence that abusive priests gradually and systematically crossed emotional and physical boundaries with the children, a process known as "grooming." They note that the socialization with the family of the victim was one method of grooming used by the priests (other grooming techniques included giving them gifts, giving them drugs or alcohol, letting them stay over, letting them drive a car, emotional and/or spiritual manipulation). In contrast, very few priests reportedly used child pornography, either showing their victims pornographic videos (3%), showing pornographic pictures (5%), or taking photos of victims (4%). It must be noted that it was not easy to access child pornography during the early years of these studies, whereas today it is widely and easily accessible via the Internet. Recent research clearly shows the role web-based pornography plays in sexual offenses against children (Quayle & Taylor, 2002).

In summary, results from the John Jay College reports strongly support a situational component to child sexual abuse. Several SCP techniques are applicable to the Catholic Church. These techniques and suggestions for reducing opportunities include the following:

Increasing Effort. Wortley and Smallbone (2006) note that to reduce opportunities for CSA to occur, it is important to increase effort and make such behavior difficult or inconvenient. As applied to the Church, these techniques are aimed at making it more difficult for priests to commit acts of abuse. The Church has already taken an important step in accomplishing this goal by implementing mandatory safe environment training programs. These programs educate potential victims (minors), potential abusers (priests), and guardians (those in the church--parents

or other community members--who may witness, be told about or become aware of abuse should it occur). Other steps include setting clear guidelines that specify under what circumstances--if any--priests are allowed to be alone with a child or adolescent, particularly in the parish residence or on overnight trips.

Increasing Risk of Discovery. The second SCP method to reduce CSA is to make it more likely that those who commit acts of abuse will be identified; i.e., increasing the likelihood of detection. Safe environment training programs help increase the risk of getting caught by "extending guardianship" (i.e., educating potential victims, parents, priests, other church employees, and parishioners about the dangers of sexual abuse and the understanding of grooming behaviors). The "zero tolerance" policies for abuse (agreed upon in 2002 by the U.S. Conference of Catholic Bishops) make the risk greater if one is recognized as an abuser. Terry et al. suggest that "Dioceses should also institute periodic evaluation of the performance of their priests. By regularly surveying priests, administrative staff and parishioners about their responses to, and satisfaction with, the priests with whom they have contact, dioceses are more likely to be alerted to questionable behavior that might have not been formally reported."

Reducing Provocations or Prompts. Controlling prompts include identifying and removing situational triggers that may prompt an individual to offend (Wortley & Smallbone, 2006). Terry et al. suggest that efforts should be made to provide priests with alternate outlets for close bonds with others (peers and similar age mates). This strategy would reduce the levels of loneliness and increase oversight. In addition, they suggest reducing the factors that may lead priests to abuse (i.e., reducing situational triggers, including high levels of job and personal stress). They suggest "providing more opportunities for the development of administrative and financial planning skills, and more time to participate in priest-support groups would decrease the likelihood of isolation and stress."

Another way of reducing provocations is to target facilitators of abuse. Pornography is an example of a facilitator of abuse. Wortley and Smallbone (2006) note that pornography plays a role in both grooming the child and sexually exciting the perpetrator prior to the abusive behavior. Although John Jay College research found low use of child pornography by abusive priests, today's easy availability of web-based child pornography suggests it may be a facilitator of abuse. Another type of facilitator is alcohol and drugs. The Nature and Scope study showed that 17% of priests who abused children used specific enticements, and in 23% of those cases, the priests used alcohol as an enticement to get minors to comply with abuse.

Reducing Permissibility & Removing Responsibility/Excuses. This target refers to clarifying the role the offender plays in the abusive behavior, and recognizing the harm that comes to victims. Terry et al. note, "It is critical not only to educate priests about the harm of abuse to victims, but also to continue to do so once they have been ordained; continued discourse about appropriate forms of closeness to others is critical throughout the life of the priest." In addition, posting signs and distributing pamphlets with information about CSA and clearly

stating that the Church has a "zero-tolerance policy" on abuse are other methods of extending guardianship and reducing permissibility.

Chapter III: Child Sexual Abuse in Youth-Serving Organizations

In the past decade, other studies have been published on CSA occurring in youth-serving organizations. Youth-serving organizations (YSOs) are establishments, organizations, and clubs that serve children for various purposes, and include schools, youth groups, faith-based institutions, and recreational or sporting clubs. As noted by Trocmé and Schumaker (1999), "participation in these activities provide children with important protective factors against sexual abuse including increased self-esteem and skills development, relationships with adults outside the home who may act as role models and confidants, and relationships with peers" (p. 631). Many of these organizations promote close and caring relationships between youth and adults outside the family, but as we have seen on a global scale, this same closeness can provide opportunities for CSA to occur.

Although the exact prevalence of CSA in YSOs is unknown, news reports clearly demonstrate that CSA in institutional settings by adults serving in positions of trust is a serious problem. As noted above, research in the U.S. has revealed widespread sexual abuse of children in the Roman Catholic Church; the same can be said for a number of other religious organizations, such as the Church of Jesus Christ of Latter-day Saints, the Jehovah's Witnesses, the Southern Baptists, and many others (Hamilton, 2008). Research also documents the widespread abuse of school children by teachers or other school employees (Shakeshaft, 2004; Shoop, 2003). Recently, the Boy Scouts of America (BSA) were ordered to pay \$18.5 million in punitive damages for allowing troop leaders or volunteers to continue working with children even after BSA administrators had received complaints that they had committed sexual abuse (Yardley, 2010). Sexual abuse has plagued state-run residential schools for deaf children across the country (Teichroeb, 2001). CSA in formal and informal day care facilities has been reported and CSA has been documented in several competitive sports including hockey, swimming, gymnastics, basketball, wrestling, and football (Brackenridge, 2001).

Several YSOs have adopted protection strategies in an effort to stop the exploitation of youth in their care. Guidelines for screening staff, for example, are provided in *Preventing Child Sexual Abuse Within Youth-serving Organizations* (Saul & Audage, 2007). Although screening of candidates and running background and criminal history checks will only provide information on certain criminal convictions, and a 'clear' background check does not guarantee someone is safe, these measures do act as a deterrent to certain offenders. Interviews (asking questions about motivation, history of abuse, support network, experience with children, and preferences for type of mentee) are recommended by Friends for Youth (2006). Once selected for positions, in-service training programs are important to inform all employees and volunteers about CSA and the organization's prevention policies and procedures, along with reporting responsibilities.

Other organizations have established policies, procedures, and ethical standards in an attempt to reduce or eliminate high-risk situations. Several organizations have developed a Child Protection Policy, which is a statement of the organization's commitment to child safety. For example, Boy Scouts of America (BSA) has a "two-deep leadership" policy, which requires at least two adults be present on all trips and outings (BSA Youth Protection, n.d.). BSA also prohibits youth workers from transporting children alone in a vehicle. Other YSOs limit contact between staff and youth to organization-sponsored activities (Wurtele & Kenny, 2012). Several organizations require that any contact with a youth outside of organization-sponsored events must be with the knowledge and consent of the parents, and with approval from supervisors at the agency.

Another risk-management strategy is to develop Codes of Conduct (or Codes of Ethics/Standards) that carefully map out professional and ethical boundaries. A Code of Conduct explains appropriate behavior expected of staff and volunteers when working with children. It is a straight-forward guide of do's and don'ts to assist staff and volunteers to conduct their work professionally and effectively. This document details acceptable and unacceptable behaviors in terms of adult-youth contact. Codes of Conduct should also state adults' (staff and volunteers) responsibilities to report suspicions, allegations, and disclosures of abuse. These documents are given to the adults, who in turn, must acknowledge in writing that the Code of Conduct is understood and will be followed. Codes of Conduct have been established for schools (e.g., Ohio State Board of Education adopted a Licensure Code of Professional Conduct in 2008) and in various sports (e.g., Child Protection in Sport Unit, 2003; Queen's Printer for Ontario, 2002; USA Gymnastics, 2009).

Other YSOs emphasize the importance of training and ongoing supervision and monitoring of adults who have close contact with youth. Fibkins (2006) emphasizes training teachers to prepare them for close personal contact with their students and to be aware of the hazards and risks involved, given the fact "that every teacher, given the right combination of personal and professional circumstances, is at risk for sexual misconduct" (p. 19). Professionals (teachers, coaches, clergy, physicians, mental health professionals) who work in close contact with emotionally needy clients must be educated to recognize when they are becoming too emotionally involved with a student/mentee/client, and how to maintain therapeutic and professional boundaries. Another important topic for training is how to intervene when a staff member sees a colleague crossing professional boundaries. In *Guidelines to Prevent Child Molestation in Mentoring and Youth-Serving Organizations*, Friends for Youth (2006) also describes the importance of ongoing monitoring of adult-child relationships. Ongoing monitoring of relationships includes direct communication (face-to-face contact, telephone conversations, e-mails), obtaining feedback from the adult mentor, child mentee, and the child's family, and conducting observations of the mentor/mentee pair.

Although the various strategies described above may be potentially promising ways to prevent CSA from occurring in YSOs, there is a dearth of research available to support their

effectiveness (e.g., Parent & Demers, 2011) . As Saul, Patterson, and Audage (2010) caution, "without a solid evidence-base, it is impossible to know if the current prevention strategies employed by youth-serving organizations are making the difference they set out to make" (p. 459).

Other efforts to prevent CSA in YSOs include educating children and their parents. A brief review of youth- and parent-focused programs is contained in the following section.

Youth-focused Prevention Strategies. School-based empowerment programs to help children avoid sexual victimization were created and widely disseminated in the U.S. starting in the early 1980s. The focus of these programs has been to teach children knowledge and skills through group-based instruction, usually conducted in educational settings. Most educational initiatives share common goals, including: (a) helping children *recognize* potentially abusive situations or potential abusers; (b) encouraging children to *refuse* sexual requests by saying "No"; (c) teaching children to *resist* by getting away from the perpetrator; (d) encouraging children to *report* previous or ongoing abuse to a trusted authority figure, and (e) explaining that secret or inappropriate touching is never the child's *responsibility* (Wurtele, 2008). Of these five "R's" (Recognize, Refuse, Resist, Report, and Responsibility), the first three are characteristic of primary prevention, whereas Report and Responsibility are typical objectives of tertiary prevention (i.e., efforts to intervene early to reduce the negative consequences of sexual exploitation).

A sizeable number of reviews and meta-analyses have been published examining empirical studies. Reviews consistently conclude that participation in such programs increases children's knowledge of sexual abuse and protective behaviors (Wurtele & Kenny, 2010; Wurtele & Owens, 1997). Programs have also been found to promote disclosure and to help children not blame themselves. Reviews also conclude that child-focused educational programs can teach children knowledge and skills without producing negative side effects (e.g., elevated anxiety, making false allegations) and may actually have positive side effects (e.g., increased parent-child communication) (Wurtele, 2009).

Reviews have also identified elements and processes of effective programs for young children. Davis and Gidycz (2000) found that behavioral skills training, including active skills rehearsal, role playing, and reinforcement, produced higher knowledge and skills gain. McIntyre and Carr (2000) identified the following core concepts as essential in prevention programming: body ownership (child's body belongs to him/her and child has the right to control access to his/her body), saying no (child has the right to say no), intuition (trusting one's own feelings when something may not be quite right), support systems (identifying adults one can turn to), blame (never the victim's fault), and secrecy (distinguishing between appropriate surprises and unhealthy secrets).

Child-focused programs have been criticized for expecting children to be solely responsible for their own protection. In addition, critics have argued that the skills and concepts taught in child-focused education programs may be too complex for children to understand. There is also some danger that an overreliance on these types of programs may give parents and society a false sense of security about children's safety following participation in such programs. At the same time, it seems reasonable to conclude that children and adolescents have a right to be enlightened about sexuality and sexual abuse and to know about their right to live free from such abuse. Indeed, Finkelhor (2009) argues that it is "morally reprehensible" *not* to equip children with knowledge and skills to potentially help them to prevent sexual abuse. Wurtele (2009) concludes that child-focused personal safety programs play an important part in the effort to keep children safe from sexual exploitation, but they cannot single-handedly prevent CSA. Furthermore, the content of these programs must be expanded if CSA is to ever be eradicated.

Wurtele (2009) suggests four ways to expand the content. First, programs must focus on potential perpetrators in the audience. At the minimum, youth (preteen, early adolescents) need to be taught that it is morally and legally wrong to sexually experiment with or exploit children. Second, this information should be incorporated into a curriculum promoting healthy sexuality across the life span. The third suggestion is to emphasize respect for all, including one's self, other people, animals, and the world. Finally, programs should focus on helping children and youth develop healthy relationship skills, including communication, social skills, conflict resolution, and assertiveness skills.

Parent-focused Prevention Strategies. An additional prevention strategy to combat CSA focuses on involving parents. There has been a long-standing call to involve parents in CSA prevention efforts. Forming a "prevention partnership" (Wurtele & Miller-Perrin, 1992) with parents has several advantages. Parents can play an important role in empowering their own children to protect themselves either by supporting their child's participation in a school-based program or by providing more direct support as adjunct teachers (Wurtele & Kenny, 2012). Educating parents about risk factors associated with CSA can also prove valuable so that parents can make changes to improve the safety of the home environment (e.g., increased supervision and parent-child communication about sexuality, careful screening of substitute caregivers, etc.). Wurtele (2009) argues that "no child-focused program should be implemented until the home environment has been prepared (i.e., until the parents have been educated about this topic and are comfortable talking with their children about it)."

At the minimum, parent-focused programs should include materials informing them of the content of the child-focused program(s) so that parents can reinforce and practice safety concepts and skills at home. Parents should be informed about signs and symptoms indicative of possible abuse and be provided with suggestions for how to handle possible disclosures of abuse. And parents need to be encouraged to talk with their children about sexuality and personal boundaries. Furthermore, parent-focused efforts can inform parents about how the environment can be made safer for their children, by screening companions and people in authority,

recognizing the grooming behaviors of potential offenders, and learning how to make sure their children are "off limits" to abusers (Wurtele, 2010; Wurtele & Berkower, 2010). Particularly in the case of clergy abuse, victims' parents made it easy for priests to have access to their children. Some felt privileged that the priest showed a special interest in their child, as described above in the quotes from the book *Betrayal*.

Studies indicate that parents not only want to be involved in preventing CSA but also are effective in teaching their young children to recognize, resist, and report CSA (Wurtele & Kenny, 2012). Wurtele, Moreno, and Kenny (2008) evaluated a 3-hour educational workshop designed to inform parents about CSA, promote parent-child communication about the topic of CSA, and help parents create safer environments for their children. Subsequent to the workshop, parents significantly increased their knowledge about the characteristics of perpetrators and reported increased parent-child communication about CSA. Unfortunately, there are very few rigorously evaluated programs, materials, or Web sites developed for parents. Although parent-focused workshops have been offered in conjunction with school-based programs, these informational meetings are poorly attended.

Summary of youth- and parent-focused prevention programs. There is strong theoretical support for multi-year (K-12) school-based educational initiatives to inform youth about their rights to grow up free from sexual exploitation. In addition, parent involvement has been described as critical for effective prevention efforts. Unfortunately, we lack national standards to provide guidance for developing prevention programming aimed at youth and their parents. Appendix A contains Good Practice Standards created by this author, based on a compilation of reviews of CSA prevention programs, guidelines provided by the National Center for Missing and Exploited Children, and (for middle school and high school programs) reviews of teen dating violence and sexual assault prevention programs.

Chapter IV: Review of *Keeping Our Promises*

Article 12 of *The Charter for the Protection of Children and Young People* directs all dioceses to create programs and processes to teach children and youth about sexual abuse and its prevention. The Diocese of Wilmington developed *Keeping Our Promises*, a curriculum for children in grades Pre-K through 12. *Keeping Our Promises* is the umbrella document guiding education on issues of safety and child sexual abuse. Content is supplemented by the established curriculum guides in Religion, Biology, Health, and Family Life. The program was established in this way because of the strong belief that every person in a school, religious education program, or Catholic youth organization shares in the responsibility for educating young people on these topics. *Keeping Our Promises* is built around eleven essential elements of a safe environment, with topics incorporated into existing classroom instruction throughout the year.

Pre-K and K: Concepts (and Outcomes) taught include:

- Secrets (never to be kept)

- Good Touch-Bad Touch (Bodies are a gift from God; Need to take care of our bodies; touches they like; Uncomfortable touching)
- Trusted Adults (identify trustworthy adults; Don't talk to strangers)
- Role of the Church
- Life is a Gift from God (Must take good care of our bodies)
- Appropriate Boundaries (I am special; Protect our bodies, e.g., keep clothes on to protect from cold, sun; Do not talk to strangers; Never go anywhere with a stranger)
- Peer Relationships (Be kind to other children; Kind/Unkind friends)
- Bullying (Define bullying; What to do if bullied; Not your fault if bullied)
- Safe Environments (Keep bodies safe, like wear helmets while biking; Always have trusted adults watch you; Obey parents, teachers, other trusted adults, to keep safe)

Grades 1-3: Concepts (and Outcomes) taught include:

- Secrets (never to be kept; Distinguish between private & public information; Identify adults with whom he/she can share important information)
- Good Touch-Bad Touch (Our bodies are sacred; Our bodies belong to us; Define Private Parts of body; Respect privacy in self and others; Good, Bad, and Confusing touches; Review Trusted adults; Skills to avoid unsafe or bad touching)
- Trusted Adults (identify trusted adults; Talk to trusted adults about situations that are uncomfortable or unsafe)
- Role of the Church
- Life is a Gift from God
- Appropriate Boundaries (Identify feelings; Concept of Personal Space; Reasons for Rules; Identify situations as safe and unsafe/dangerous; Know it's OK to disobey an adult who asks for something the student knows is wrong; What to do when a person in authority wants a student to violate standards of goodness and safety)
- Peer Relationships (Rules of courtesy; what makes a person a good friend; Show appreciation for friends; Friendship means speaking up if another person is being hurt)
- Bullying (What is bullying?; Ways to avoid bullying/being bullied)
- Safe Environments (Trusted adults should always watch them; Understand what makes a place or situation safe/unsafe; Know what to do if situation becomes unsafe)

Grades 4-5-6: Concepts (outcomes) include:

- Secrets (Distinguish between public/private information; Distinguish between good/bad secrets; Consequences for telling a secret)
- Good Touch-Bad Touch (Difference between good/bad touches; Appreciate that touch is a gift from God; Identify confusing touches; Confusing touches need to be discussed with trusted adult; Ask for help if touch is bad or confusing)
- Trusted Adults (Define trustworthy; Identify trusted adults; Who may be untrustworthy; Understand what it means to violate trust; Appreciate how the Church makes sure that adults who work with children are safe and can be trusted; Know that even trusted adults may not always be safe; How to protect self from an unsafe adult)
- Role of the Church
- Life is a Gift from God (our bodies must be cared for and cherished; respect for self and others; respect for life)
- Appropriate Boundaries (respect personal space of others; Know when, where and how to touch another person; respect the rights of others; review rules relating to touching and physical contact)
- Peer Relationships (Understand importance of having healthy relationships; Ways to choose friendships; How to avoid unhealthy relationships; Developing a positive self-image; Understand concept of peer pressure; Understand stereotyping; How to avoid stereotyping; Identify common stereotypes of pre-adolescent students; Identify positive and negative peer pressure)
- Bullying (Define bullying; Ways to avoid bullying and being bullied; Explore reasons leading to bullying; Consider/Empathize persons who might be targets of bullies; Discuss ways to reach out to victims; How to challenge the actions of bullies; Discuss reasons for rules on bullying)
- Harassment (Understand/define harassment, physical, verbal, and sexual; Discuss how harassment hurts victim, harasser, and community; Review school and diocesan policies on harassment; Understand U.S. laws to protect from harassment; Discuss responsibilities as Christians to care for others)
- Safe Environments (Define/describe safe environment; Learn how to seek/find safe environments; Know what to do if an environment becomes unsafe; Learn ways to protect oneself)

Grades 7th and 8th: Concepts (outcomes) include:

- Secrets (Distinguish between "ratting out/tattling" vs. disclosing; Distinguish "public" and "private"; True friend)
- Good Touch-Bad Touch (Code of Conduct; Good touch/bad touch with peers, younger children, adults; Policy on Harassment; Students develop Covenant for Conduct)

- Trusted Adults (Identify trusted adults; Characteristics that make a person a trusted, not a trusted adult)
- Role of the Church (Review Church's programs and standards; respect for God, self and others)
- Life is a Gift from God (human body is gift; respect self and others; respect others' differences; Discuss availability of pornography on Internet)
- Appropriate Boundaries (identify own personal boundaries; share boundaries with others)
- Peer Relationships (ingredients of a good relationship; understand personal responsibility for peer relationships; standards of appropriate behavior in group relationships)
- Bullying (Recognize ways bullying is manifested; learn conflict resolution skills; learn problem solving skills; determine when to seek adult help)
- Harassment (Policy on Harassment; Requires victims to speak out)
- Safe Environments (Become familiar with "two adult rule"; Certain behaviors are not acceptable, bullying, harassment, put downs, hazing, hate-motivated behavior, violence)
- Healing (Recognize when one has been hurt; Identify sources of help/healing; Do not blame self if victim)

Grades 9-12: Concepts (Outcomes) include:

- Secrets (difference between public and private information; Consequences of gossiping; Technology as a gift, but can be abused via identity theft, defamation of character)
- Trusted Adults (importance of confiding in an adult; Importance of confidentiality; Importance of truth telling; Recognize when a suspicion should be reported)
- Role of the Church (Discuss sexual abuse scandal; Know what church is doing to prevent future abuses)
- Appropriate Boundaries (Appropriate/inappropriate boundaries on phone, in person, on computer; violations of boundaries; adult/student boundaries; consequences for false reporting; respect personal privacy and space; consequences for sexual assault; ways to seek help; responses when boundaries are violated)
- Peer Relationships (Understand peer influence; Relationship between diminishment, intimidation, and rape; How peers define rape; consequences of unhealthy relationships)
- Bullying/Harassment (Define bullying and harassment; Why is it wrong?; Identify insulting words, hazing, how to respond)

- Safe Environments (safety instructions/policies; crisis responses; importance of notifying adults; Bullying/harassment, put downs, hate-motivated behavior, violence are not acceptable)
- Forgiveness/Healing (Role of forgiveness as it related to Church sex abuse scandal; Responsibility of the Church to sex abuse victims; Understand impact of sex abuse on victim)

Parent Materials

- A sample letter for parents/guardians introducing *Keeping Our Promises* is included. It describes the program ("to teach children and young people about sexual abuse and its prevention") and invites parents to an informational session OR sends home an information packet informing the parent of the "sexual abuse awareness training that is being initiated at the parish/school."
- A Request for Exemption form is also included in the packet, should the parent choose not to have his/her child participate in this educational process.

Resources

- An extensive list of teaching resources is available, including Brochures, Books, Games, Posters (on bullying), Videos (on teen dating abuse; sexual harassment, bullying)

Review of and Recommendations for *Keeping Our Promises*

1. Description of Program: Page 3 of the manual states that "*Keeping Our Promises* is built around eleven essential elements of a safe environment." Those concepts across all grade levels include the following:

1. Secrets
2. Good Touch-Bad Touch
3. Trusted Adults
4. Role of the Church
5. Life is a Gift from God
6. Appropriate Boundaries
7. Peer Relationships
8. Bullying
9. Harassment
10. Safe Environments
11. Healing/Forgiveness

Recommendation 1: *Editorial Changes to Introduction & Essential Elements.* The following are suggested changes to wording/organization:

- A. List all concepts in the Introduction, including the rationale for each concept.

B. Consider re-ordering the concepts, starting with "Life is a Gift from God" as the foundational concept. I recommend starting these programs with the message about how special each child is, how special their bodies are, emphasizing the need to take care of their special bodies and special body parts, leading into ways of helping youth learn how to protect their bodies and to develop healthy relationship skills.

C. Clarify your conceptual approach in the Introduction to *Keeping Our Promises*. Currently, your stated frame of reference or conceptual approach is "sexual abuse awareness" (p. 3). Consider describing it as a comprehensive, multi-disciplinary, multi-year curriculum focusing on "Respectful Relationships." Alternatively, you might consider adopting a "Rights-based" framework, using Title IX rights to freedom from sexual harassment in schools or the U.N. Convention on the Rights of the Child. Many schools are countering violence by recognizing that all children have equal rights to education in settings that are free of violence, and that one of the functions of education is to produce adults imbued with non-violent values and practices. For example, Victoria (Australia) has developed guidelines for building respectful and safe schools (available at <http://www.education.vic.gov.au/respect>). Principles of a rights-based, respectful school include the following (from the U.N. World Report on Violence Against Children):

1. Proactively inclusive. The school seeks out and enables the participation of all children of both sexes, and especially those who are different ethnically, culturally, linguistically, socio-economically, and in their abilities or disabilities.
2. Academically effective and relevant. It meets children's needs for life and livelihood knowledge, attitudes and skills.
3. Gender-sensitive. It creates environments that foster gender equality.
4. Health and protective. It promotes and protects children's emotional, psychological and physical well-being by providing a healthy and protective educational climate.
5. Engaged with the family and community. It seeks out and enables the participation of children's families and the community in the development and implementation of all aspects of school policies and programs.

2. Home-School Linkages: As noted above in the review of parent-focused prevention efforts, in order to be effective, CSA prevention programs must actively involve parents. I note that the manual instructs educators to "involve parents in the planning, programming and implementation of this program" (p. 3). In addition, your parent brochure stresses that "educators and care givers work in partnership with parents/guardians" since parents are "the first teachers of their child." *Keeping Our Promises* could be improved by including more parent involvement. In order to strengthen the home-school partnership to enhance children's personal safety, consider:

Recommendation 2: Enhance Parent Involvement. Provide educators with materials and suggested ways of involving parents (e.g., homework assignments to encourage discussion at home; discussion tips; asking parents to teach lessons at home; sending information sheets or descriptions of lessons home). I suggest mapping these Parent Components onto your *Keeping Our Promises* curriculum. And if you are not already doing so, be sure to get parent input into the content of these assignments. (see Recommendation 12).

3. Setting for/Dosage of Program Delivery: *Keeping Our Promises* is offered in schools; the recommended location for program delivery. Locating programs in schools increases their accessibility and is less stigmatizing than services provided, for example, in mental health settings or to youth deemed to be at risk for victimization or perpetration. You are also to be commended for infusing program concepts into different classes and across all grade levels, and for creating a "safe environment" climate in your schools, where all adults share in the responsibility for keeping children safe.

4. Sexuality Development. I advocate that parents and other educators provide sexual abuse prevention education while simultaneously promoting children's healthy sexual development (Wurtele & Kenny, 2011). Children who do not know about these two topics--sexuality and body safety--are more vulnerable to sexual abuse (Wurtele & Berkower, 2010). Children and adolescents require instruction that promotes healthy sexuality. In addition, in an age when CSA is increasingly on our minds, it is important for teachers and parents to understand what are common sexual behaviors and which behaviors are uncommon, potentially harmful, or might signal that a child is being sexually abused or is at risk for abusing other children. Although many schools are reluctant to cover sexual health issues, recent surveys show that most parents, along with educators and students themselves, desire school-based sexuality education courses. Sexuality education must begin early and continue through high school, with students given progressively sophisticated and detailed information as they develop.

Recommendation 3: Sexuality Education. I understand that sexuality education is addressed in Health, Religion, and Family Life. Thus, the following suggestions are to be considered when integrating CSA prevention concepts into these other curricular areas.

A. One of the easiest places to start sexuality education is by teaching children the correct names for their genitals. Children at this age should be able to name all the parts of the body (including the genitals) and understand their functions. This knowledge also provides the necessary foundation for CSA prevention education. Successful disclosure of abusive incidents relies partly on the child's ability to describe inappropriate activities involving the genitals and to correctly label the genitals. When children disclose CSA using incorrect or idiosyncratic terminology (e.g., "He kissed my VJPJ"), they may not be understood and are thus unlikely to receive a positive, supportive response to their disclosure. Furthermore, children who lack sexual knowledge may be more vulnerable to sexual abuse. Some sexual offenders avoid children who know the correct names for their genitals, because this suggests that the children have been educated about body safety and sexuality. One convicted offender reported that when children knew the correct terms for their genitals, he would leave them alone (Sprenghelmeyer & Vaughan, 2000). In Grades 1-3 you teach children that the areas of the body covered by bathing suit are considered private. I strongly recommend teaching children from PreK-K up the correct terms for genitals, then you can refer to the genitals and breasts collectively as "private parts."

B. Provide guidance to parents, child-care providers, and teachers about normal sexuality development along with how to respond to normal and problematic sexual behaviors in ways that reinforce your body-safety messages. Consider implementing the educational guidelines in Wurtele and Kenny (2011), beginning with early childhood and continuing through adolescence. For example, do parents and teachers know how to respond when children are playing "sex" games with similar-age peers? Or when children are touching/rubbing their genitals in public?

Early childhood presents ample opportunities for fostering children's sexuality development and for teaching body-safety rules to prevent sexual victimization.

C. Be sure to prepare both boys and girls for the changes they will experience during pubescence, and do this early. For example, I see that you cover menstruation with girls in the sixth grade. With earlier pubertal maturation, I recommend providing information to youth much earlier--at least by age 10, ideally between 8 and 10 years of age. It is also important that both genders be informed about the changes of puberty experienced by both boys and girls. Knowing what the other sex is experiencing may cut down on inappropriate teasing or insensitive comments.

D. As tweens (10-12 year olds) begin expressing sexual interest, adults can help them with this developmental challenge. This age is a prime time for caring adults to insert values and religious or moral beliefs into discussions about respectful relationships, dating, and sexual activities. Both teachers and parents might emphasize values such as staying safe, respecting yourself and others, appreciating personal boundaries (your own and others'), and avoiding sexual behaviors that are harmful to themselves or exploitative of others. From middle school on, it is important for students to consider whether their behavior violates such principles as consent, coercion, respect, rights, exploitation, or empathy, and to be informed about the potential legal consequences of certain sexual behaviors. Tweens and teens need to hear the very clear message that exploiting, pressuring, or coercing another person to have sex is harmful, wrong, and possibly illegal. Young people need safe, supportive adults with whom to discuss possible sexual feelings they may have for younger children, family members, or same-sex peers, along with opportunities to discuss how to deal with these feelings. Adults need to emphasize that sexual contact with younger children is abuse, not play; that it is a crime and harms children; and that children can never consent to sexual relations (Wurtele, 2012). With this approach, the focus shifts to preventing the development of sexually exploitative behaviors, which is ultimately the only way we can ever hope to eliminate CSA.

E. Strive for a more balanced presentation on sexuality and intimate relationships. Currently, *Keeping Our Promises* presents a rather negative tone regarding sexual relationships and intimate peer relationships. For example, in the Peer Relationships (9-12) section, there appears to be a strong focus on rape. Same for Appropriate Boundaries (9-12). It is important not to inadvertently teach students that sexuality is dangerous and harmful. Consider taking a stronger focus on helping tweens and teenagers to develop and maintain healthy relationships, with peers, friends, and romantic partners. There are a number of workbooks and programs that focus on healthy relationships (e.g., Choose Respect; Safe Dates; RELATE; Love Is Not Abuse; Youth Relation Project; FaithTrustInstitute.org).

F. With our highly sexualized culture, there are huge pressures on both girls and boys to be sexual at ever younger ages. Youth benefit from discussing these social pressures, and dissecting the messages they are bombarded with from the Internet, movies, TV, advertisements, and music. I recommend you engage your students in "media literacy" discussions to help teens recognize the cultural forces shaping their views on sexuality. Educators can help youth develop media literacy skills to understand, interpret, and evaluate sexual messages and imagery. Discussions about the harmful nature of pornography could be included here. This recommendation would appear to align nicely with your Health Standard 2 (Students will

analyze the influence of family, peers, culture, media, technology, and other factors on health behaviors).

5. Accountability/Assessment/Evaluation: Although p. 3 states the need to ensure "our teaching is consistent and sequential," it is not clear whether process or outcome evaluations are being conducted. Furthermore, tables describing concepts include "assessment strategies" in one column, but these appear more like instructional strategies, not ways to assess effectiveness.

Recommendation 4: I strongly recommend that your curriculum advisory committee (with input from parents and students, where appropriate) help you map the content of *Keeping Our Promises* onto your other courses of study. In particular, the content would appear to closely align with the 8 standards listed in your Health curriculum.

Recommendation 5: In addition to content mapping, consider asking schools/programs to submit plans for assessment of students. Conduct process evaluation of program implementation and fidelity (i.e., are teachers covering the concepts?). In addition, outcome evaluations could include participant satisfaction questions (e.g., What did you enjoy?), measures of knowledge change, and ideally measures of attitude change in addition to skill development. Follow-up assessments can assess lasting impact.

6. Teaching Children to Recognize Violations of Body Safety. One of the most difficult body-safety concepts for young children to learn is the first "R" (i.e., helping children *recognize* potentially abusive situations or potential abusers). Early versions of CSA prevention programs defined sexual abuse as "bad" or "confusing" touches, and taught children to rely on their feelings to decide whether a touch was safe or not. With due respect to Sherryll Kraizer's work, empirical research has demonstrated that teaching children to "listen to their feelings" or teaching them to say no and tell about "bad" or "uncomfortable" touches is not effective with young children (Kenny & Wurtele, 2010; Wurtele, Kast, Miller-Perrin, & Kondrick, 1989).

I note that children in PreK through Grade 3 are taught to avoid people who give them good/bad/confusing/uncomfortable touches. Another limitation of this approach is that some touches that feel bad (like injections) may be good for children, and some touches that feel good (e.g., fondling) may actually be inappropriate. In addition, not all sexually abusive interactions involve touches (e.g., sexual language; child pornography).

Recommendation 6: Body-Safety Rules. Following are four suggestions to help students recognize inappropriate requests (or harmful/illegal sexual behaviors), and how to help children identify offenders and recognize grooming behaviors.

A. Delete all references to good/bad/uncomfortable touches as a way to help children distinguish between appropriate and inappropriate touching. With young children, I recommend that you: 1) teach children the difference between "okay" and "not okay" touches/viewing of the private areas of the body; and 2) help children understand that *no one* has a right to touch (or look at) their private parts (unless they need help). For example, in my Body Safety Training Program (Wurtele, 2007), children learn the body-safety rule, "It's NOT OK for anybody to touch or look at my private parts, unless they're hurt or I need help." This concrete, rules-based strategy has been found to be effective with children as young as three (Wurtele, 2008). As

children get older, the language can focus on rights and laws (e.g., "No one has the right to touch the private areas of your body without your permission.").

B. Since children are also asked to touch the abuser's genitals, be sure to teach children another body-safety rule ("It's Not OK to touch other people's private parts"). For Teens: "You do not have the right to touch someone else's body without that person's permission. It is never acceptable to force, coerce, bribe, threaten, or manipulate another person into any type of sexual activity." Explain to teens that it is wrong (and a crime) to force or trick anyone, including a child, into sexual activity. Make sure teens know that sexual contact with children is abuse, not play, and that it is a crime and harms children.

C. Inappropriate sexual behaviors are not limited to touching. They can also include showing/taking pictures or videos. Sexual abusers also take pictures of children while they are undressing or being made to perform sexual behaviors and then use these pictures to blackmail the child into continuing sexual activities. Be sure to teach children body-safety rules about picture-taking activities (e.g., "No one is allowed to take pictures or videos of your private parts or of you doing anything when you're naked, like going to the bathroom, dressing, or bathing."). And "It's not OK for you to look at pictures or movies of people who are naked." For teens: "It's a crime for an adult to take pictures or videos of your naked body" and "It's illegal for adults to show you pornography."

D. As you know, sexual abusers of children are a heterogeneous group. They can be adults of any age, size, or race, actually include both males and females, and also teenagers. They can be strangers, but most likely are people children know or love (including family members, acquaintances, authority figures). Starting in the PreK and K lesson plans there is a very strong "stranger danger" message delivered to students. Children are advised "not to talk to strangers" and "never go anywhere with a stranger." Also in grades 1-3 students discuss the concept of strangers. Although I agree with the importance of teaching safety rules regarding strangers, stranger-danger messages are not necessary to prevent CSA, since in the majority of abuse cases, the child knows the perpetrator. Thus, I strongly recommend that your examples of people asking them to break body-safety rules should include a variety of authority figures, both males and females, including family members, siblings, neighbors, babysitters, teachers, coaches, priests, etc.

E. With teens, consider describing grooming behaviors to help them recognize they are being "set up" for abuse. Help them understand how adults can exploit teenagers' sexual curiosity and take advantage of their normal needs for affection, intimacy, and companionship. Help teens understand how it can feel flattering or exciting when an adult takes an interest in them. Describe inappropriate behavior or violations of boundaries by authority figures (i.e., red flags). Teens need opportunities to discuss CSA by teachers, coaches, or priests, who take advantage of their position of authority to sexually exploit them.

7. Teaching Children to Refuse & Resist. After recognizing potentially abusive situations, children need to be encouraged to *refuse* inappropriate requests by saying "No" and *resist* by getting away from the offender. I note that in grades 1-3 and 4-6 you have children practice saying "No" and "Stop that!" in unsafe environments. Then in grades 1-3 you instruct children to leave a situation or place that is unsafe.

Recommendation 7: Consider modifying the lesson (in PreK & K, Safe Environments) where students are told to obey parents, teachers, and other trusted adults, to keep safe. Children who are taught blind obedience to adult authority are more vulnerable to sexual abuse (Wurtele & Berkower, 2010). Children need permission to say "No" to *any* authority figure who asks them to do something that's not safe, that could endanger them, or that would break a body-safety rule.

Recommendation 8: As noted above in the review of school-based programs, effective programs include behavioral skills training, including active skills rehearsal, role playing, and active involvement of students. *Keeping Our Promises* includes some exercises and interactive learning opportunities. Consider providing even more opportunities for skills development (practice, role-playing, rehearsal) at all grade levels. Be sure to include concrete examples where known people (including family members and authority figures) are trying to touch/look at children's private parts. This recommendation is consistent with your Health Standard 4: Students should have ample opportunities to demonstrate interpersonal communication skills to enhance health and avoid or reduce health risks.

8. Teaching Children/Youth about Reporting. An important component of educational initiatives is to encourage children to *report* previous or ongoing abuse to a trusted authority figure. Along with training your staff in responding to disclosures, children must be encouraged to disclose and seek adult support, and given opportunities to practice telling. Indeed, research with young children shows that reporting is a very difficult skill to learn (Wurtele & Owens, 1997). In *Keeping Our Promises* there is a strong, consistent message to youth encouraging them to tell a parent or another responsible adult should they need help. I understand your students have peer mentors, counselors, nurses, teacher aides, and other trusted adults available to them to discuss their concerns and questions. In addition, your Health Standard 4 stresses helping students ask for assistance to enhance the health of self and others. In addition, you have a 24-hour telephone number for boys and girls to call to report their concerns and/or allegations of abuse. Having a way to confidentially (and anonymously) report concerns is important for those students who do not perceive that they have a caring adult to tell about their safety concerns.

Recommendation 9: Although there is a strong message encouraging youth to tell an adult should they need help, young teenagers are often reluctant to tell an adult, but are more likely to confide in their friends if they are being sexually abused. I suggest giving students opportunities to brainstorm how they would help a friend who discloses abuse, emphasizing that if a friend tells them of abuse, they need to tell an adult about their friend's problem.

9. Informing Youth about Responsibility. The final "R" refers to explaining to children that inappropriate touching/sexual assault is never the child's *responsibility*, but that the offender is always responsible for his/her behavior. I note that Pre-K and K teaches this concept in relation to bullying (not your fault if bullied), and Grades 7-8 tells students "not to blame self if you are a victim" (under Healing).

Recommendation 10: Be sure this very important message is taught at all grade levels, perhaps by including it in your Forgiveness/Healing element.

10. Harassment/Bullying: Program developers are to be commended for addressing this growing threat to children's well-being. Studies indicate a high prevalence of bullying peaking in the 7th and 8th grades. Helping students understand the different forms of bullying, including

cyber-bullying, and discussing them early (in grades 4-6) is extremely important. Although empirical evidence is limited, it is certainly possible that a bully's use of aggression, dominance, and power could generalize to romantic relationships. Thus, targeting sexual harassment (also referred to as sexual bullying) and other forms of bullying during childhood can possibly forestall dating violence occurring in during adolescence. Student-to-student sexual bullying (SB) is common and involves verbal taunts and also sexual behaviors (e.g., touching a girl's breasts, brushing up against a student's body; sexting). Another important reason to address bullying behaviors is the established link between having a safe school environment and improved learning.

11. Internet/Digital Technologies: I commend you for covering cyber-bullying, including Facebook/Myspace bullying starting in the fifth grade, and for helping teens develop critical thinking skills so they can make safe decisions in cyberspace. Make sure teens know that it is illegal/wrong for adults to show them pornography and for them to send/receive sexually explicit photos of themselves or peers (sexting).

12. Engaging Children/Youth: Teaching environments that put children at the center of the learning experience, so that teachers listen to their concerns and needs, are more likely to effectively address violence. Exploratory studies and experience have identified benefits of involving children in the development and implementation of programs to address violence and harassment in schools (Greene, 2005). I note that *Keeping Our Promises* includes several student-driven initiatives (e.g., Grades 4-6 suggests having students make posters about harassment; in Good Touch-Bad Touch 7-8 grade students develop a Covenant for Conduct; also in 7-8 grade Harassment the students develop a pamphlet explaining harassment to other students). I also note that you have advanced students proctoring younger students (e.g., 4th graders learn how to be positive role models to 1st grade buddies).

Recommendation 11: Provide ample opportunities for students to participate in the selection, development, and implementation of prevention initiatives. Students can be trained to serve as co-facilitators during lessons, work cooperatively to advocate for improving personal, family, and community health (Health Standard 8), develop exercises/instructional strategies that can be taught to younger students, and develop safety-enhancing messages and communication techniques to specific target audiences.

Chapter V: Review of DOW Parent-Focused Educational Programs/Materials

Section Four (Resources) of *For The Sake of God's Children* (2010) contains the following materials for parents:

1. Talking Points for Parents and Children.
 - a. Teach children full name, address, telephone number.
 - b. Never leave children unattended.
 - c. Explain difference between good/bad touching
 - d. "Children need to know proper names for body parts." Refers to "private parts" but does not provide proper names.
 - e. Teach children a family password.
 - f. Never leave children unattended in a car.
 - g. On telephone, never let anyone know they are home alone.
 - h. Never open the door without you being present.
 - i. Encourage children to use the buddy system, stay on route.
 - j. Do not let children wear clothing with their names on it
 - k. OK to say no to these adults; strangers who want to show them pictures, strangers to take pictures of them, give directions to driver of car, go into house/property, asked to do anything that might frighten them or make them feel uncomfortable or touches that make you uncomfortable

2. Beginning the Year with Ways to Make Kids Safer
 - a. Teach children names, addresses, phone numbers
 - b. Teach children how/when to use 911.
 - c. Instruct children about opening doors, answering phone.
 - d. Choose babysitters with care
 - e. Learn about the internet to teach children about risks.
 - f. Place family computer in common area; monitor online activity
 - g. Use privacy settings on social networking sites
 - h. Monitor their screen names
 - i. Don't display children's names on clothing
 - j. Encourage children to use buddy system
 - k. Review school route
 - l. Point out homes they can visit, go to for help
 - m. Teach children to ask permission before leaving home
 - n. Teach children it's okay to say NO to anything that makes them feel scared, uncomfortable or confused.
 - o. Teach children not to go near pools without adult supervision
 - p. Set up "What if" situations to practice safety skills
 - q. Establish location to meet should someone get lost

- r. Teach child to check in with you if there is a change in their plans

3. Parents...Talking with Children about Physical or Sexual Abuse

Although the handout's title suggests it will cover physical abuse, the content is specific to sexual abuse. It encourages discussions with children, does refer to private parts, but uses good/bad touches (e.g., "Has anyone ever touched you in a bad way"). It covers telling, responsibility, noticing symptoms, how to respond to a child's disclosure, and then focuses on stranger-danger.

4. "What If" Situations Test (WIST)

I developed the WIST as a way to measure the five R's (Recognize, Respond, Resist, Report, Responsibility). I understand some teachers use it as a teaching tool.

5. 7 Steps to Protect your Family from Pornography (January, 2010)

This document gives statistics on porn use, including children accessing porn on the Internet. It then lists 7 steps to protect family:

- a. Use filtering and accountability software for computers, cell phones, and video games.
- b. Monitor social networking sites for children and teens.
- c. Know user names and passwords.
- d. Screen television content; use teachable moments to discuss values.
- e. Spend quality time with your children and teens
- f. Discuss God's glorious plan for creating us male and female and the beauty of our human dignity and sexuality.
- g. Encourage family to receive the Sacrament of Reconciliation monthly.

6. Pornography Materials

Next is a 17-page document (with citation from <http://archkck.org>). It includes some helpful suggestions for discussing the messages behind sexualized media, including songs, shows, movies, and pornography. Parents are encouraged to use these teachable moments to discuss family values, along with the negative effects of pornography (objectifying people). Another handout for tweens and teens encourages them to set limits, seek help, and be aware of what messages their clothing/accessories sends to others. There are tips for parents regarding ground rules for children while using the computer (reasonable for children, not for teens). The hand-out, "Age-Appropriate Talking Points about Pornography" breaks down tips by ages/grades but does not mention pornography until high school (yet a previous handout states that the age of first Internet exposure to pornography is 11). There is also a statement, "Recognize girls will sometimes

give sex in hopes of getting love, but instead will be used." Consider modifying this to include boys.

7. 4-page Parent Handout (Information for Parents and Guardians)

Covers 1) Definitions of child abuse, types of child abuse, 2) Signs of physical abuse, neglect, sexual abuse, and emotional abuse; 3) Procedures in place in the DOW aimed at preventing child abuse; 4) What you can teach your child (good/bad touch); 5) Myths/Facts about sexual abuse; 6) Guidelines when you suspect a child is experiencing sexual abuse; 7) statistics on prevalence of sexual abuse; and 8) contact information for reporting and for additional information.

Summary and Recommendations

Several surveys have found that parents lack crucial information about CSA and often adhere to many common myths. For example, parents underestimate the prevalence of CSA, are largely unaware that boys and young children can be sexually exploited, and that teenagers, siblings, and females can be sexual perpetrators. Other studies show that parents have very limited knowledge of common symptoms of CSA, and few know about the symptoms which might raise concern about sexual abuse in adolescents. For example, parents often believe CSA leads to physical injuries. Such a narrow conception of CSA may lead to delayed identification and recognition of abuse. Clearly, smarter parents mean safer children. The following is a list of essential components to a comprehensive parent education program designed to enable parents to become better informed and make strategic decisions to improve the safety and development of their children.

- Define and describe sexual abuse (including both contact and non-contact forms).
- Provide information on prevalence and consequences.
- Describe perpetrators (including relationship to child, grooming behaviors, adolescent offenders).
- Describe characteristics of victims (examples should include both males and females of all races, ages, sizes and physical abilities/limitations).
- Describe signs and symptoms of abuse at different developmental stages.
- Describe how to handle disclosures (including the importance of believing a child, being supportive and reporting abuse, and seeking therapeutic assistance).
- Brainstorm possible modifications that parents can make in their home environments and parenting styles to reduce children's risk factors (e.g., teaching correct terms for genitals, teaching children body-safety rules, not requiring children to demonstrate

physical affection with loved ones, respecting personal boundaries and privacy, discouraging secret keeping, having open communication in the home, carefully screening companions and substitute caregivers).

- Inform parents about children's healthy sexuality development, teach them how to provide sexual abuse prevention education while simultaneously promoting children's healthy sexual development, along with ways to detect and intervene with youth who show early signs of sexual interest in children.
- Inform parents of young teens about the dangers facing this new generation of teenagers, help parents talk openly about healthy, safe romantic relationships and dating rights and responsibilities, and help their teens become critical consumers of today's sexually charged media environment.
- Given the occurrence of online sexual solicitation of youth, along with frequent occurrences of cyber-bullying and the dangers of sexting, parents need to be informed about safe Internet use and how to talk to their children about online safety.

Recommendation 12: *Involve Parents to Help Create Safe Environments.* Your parent materials clearly state that parents and guardians are the primary educators of their children, and that educators work in partnership with parents/guardians. However, I do not see much evidence of active parent involvement in your safe-environment programs. To support and affirm that partnership, consider how parents/caregivers can contribute to your child safety efforts (e.g., by involving laity in some kind of independent safety counsel; serving on curriculum advisory committees). Also, consider incorporating homework assignments for children to discuss topics with their parents/guardians, along with teaching tips to help parents reinforce and practice safety concepts and skills at home (see Recommendation 2).

Recommendation 13: *Refine and Expand Content.* The parent materials I reviewed primarily focus on "stranger danger," fail to accurately describe offenders and typical warning signs of sexual offending behaviors, lack guidance on discussing normative sexuality development, and focus heavily on pornography (referring to the 17-page document addressing this topic). Your parent informational brochure is a great start, but sexual exploitation of minors is so different from the other forms of child maltreatment (i.e., physical and emotional abuse and neglect) that it might warrant a stand-alone brochure, or at least separate pages devoted exclusively to CSA.

Here you could provide parents with some of the warning signs of grooming, along with tips on what actions to take if they observe possible indicators of abuse. Expand on the "What you can teach your child" section (following my tips above). I really appreciate that your parent handout describes the child protection policies already in place so that parents are fully informed about safety protocols (e.g., two-adult rule; parents must provide consent to visit homes or travel). You might describe what parents should do if these policies are not being followed by staff or

volunteers. What is the process of filing a concern/complaint? And be sure to align the content of *Keeping Our Promises* with the content of parent-focused materials. For example, before teaching children not to keep secrets, it is very important to consult with parents so that the same message is being taught both at home and school. Parents need to be educated about the importance of the "no-secrets" rules. Secret-keeping is a difficult habit to break in many families.

Chapter VI: Review of DOW Reporting Policies/Procedures

Policies and protocols represent important risk-management tools for the prevention and early identification of sexual misconduct, and for protecting those already victimized by such misconduct. The Diocese of Wilmington policies (revised 2010) include the following:

1. Background Checks
2. Ethical Standards for Church Personnel
3. Safe Environments

Using the rubric developed for this review (see Appendix B), it is clear that DOW has put considerable time and effort into developing and revising these policies, particularly the criminal check policy. As requested, this chapter will focus on policies/procedures specific to reporting suspicions, disclosures, and allegations of abuse. Appendix B contains feedback on other policies/procedures related to child safety.

Investigating and Reporting Suspected Abuse or Neglect

The possibility that youth involved in DOW programs are vulnerable to abuse is openly acknowledged and addressed in its formal policies and procedures. DOW is to be commended for meeting several of the criteria for Standard 5 (see Appendix B) including the following:

- Purpose of child protection policy is clearly stated: "The Diocese deplores the harm and injury individuals and families suffer because of anyone's misconduct."
- DOW is committed to the detection and reporting of child maltreatment.
- Training about reporting child maltreatment is compulsory.
- All employees receive orientation in child abuse reporting.
- Copy of state reporting law is available at each agency site.
- There is a clear plan for immediately eliminating contact between accused and alleged victim during investigation.
- A Victim Assistance Office has been created and a Victim Assistance Coordinator is named who makes arrangements to obtain professional services for victims.

- Persons making reports in good faith are immune from civil and criminal liability.
- All information obtained about the investigation is kept confidential.

To address the need for complete transparency in handling suspicions of child abuse to civil authorities, I offer the following suggestions:

Recommendation 14: *Reporting Sequence.* During training and in all materials, provide clear step-by-step guidance on what action to take if there are concerns, allegations, suspicions, or disclosures of abuse. You might consider creating a flow chart or checklist which clearly describes the steps to follow in the process of reporting. On the flow chart, include names and contact information for people responsible for receiving verbal and written reports.

Recommendation 15: *Evaluation of Training.* Consider measuring knowledge, attitudes, and behaviors expected to change as a function of the training. Periodically, summarize the number and type of complaints about misconduct (whether founded or unfounded) and use this information to refine your training efforts.

Chapter VII: Review of DOW Seminarian Educational Program

Manual E, section 6, contains materials used in the educational program for Seminarians. The outline for training is as follows:

- Background
- History of the Charter
- Diocesan Response to the Charter: For the Sake of God's Children
- Diocesan History with Sexual Abuse of minors
- Policies/Procedures for handling an allegation of sexual abuse of a minor by church personnel
- Ethical Standards for Seminarians/Deacons
- What is child abuse? (forms, indicators, frequency, impacts, long-term effects, why children don't tell, talking with children about abuse)
- What is needed for a safe environment? (reduce risk, recognize signs of distress, respond, report)
- Four Preconditions (Finkelhor)

- Addressing Motivation to Abuse
1. References and Background Checks
 2. Keep internal inhibitions intact. Tend to your physical and emotional health. Seek supervision, be accountable. Avoid substance abuse.
 3. Maintain external inhibitors (Adhere to 2-adult rule and buddy systems; Acknowledge/respect power differential in relationships; Use praise and positive regard, not coercion, threats or excessive flattery; Be consistent in defining and enforcing rules; Focus on purpose of interactions with youth)
 4. Build resistance to abuse (Educate parents and children; Discuss safe boundaries; Affirm child's right to say no to unwelcome contact; Teach youth about healthy relationships)
- Who is a Sexual Predator (statistics, local experience, profile/signs, identifying the signs)
 - Talking to adults about signs of abuse
 - Pornography and abuse
 - Materials (DVDs, brochures)

Critique of Outline:

As a working document, this training outline seems fairly comprehensive. Consider clarifying how seminarians are to handle allegations of sexual abuse and include a flow chart or sequence of steps to clarify their reporting responsibilities. In terms of the Ethical Standards document, I appreciate the emphasis on

- recognizing the unique power they have in ministerial relationships,
- assuming the full burden for setting and maintaining professional physical and emotional boundaries,
- not taking unfair advantage of ministerial relationships for their own benefit,
- prohibiting all forms of abuse, harassment, discrimination, and exploitation,
- describing appropriate and inappropriate behaviors to exhibit with youth, and
- reporting their own ethical and professional misconduct and the misconduct of others.

Recommendation 16: *Wording Suggestions.* One power-point slide lists "Warning Signs of Sexual Predator." I recommend that you delete all references to the term "predator" as it brings up images of a ruthlessly aggressive person--a description that fits very few people who

sexually abuse children. The "predator" label can make it difficult for someone who may be sexually attracted to children to recognize these proclivities when she/he is clearly not a "predator." Similarly, another slide (Who is an Abuser) lists "married" as one of the characteristics. I would suggest deleting that one too, as that characteristic certainly is not an accurate descriptor of priests, nor has it been found to be true of the majority of offenders. Perhaps you could make the point that there is considerable heterogeneity among sexual abusers, and that they are indistinguishable in terms of physical or demographic characteristics. However, they often show signs of sexual interest in children, which would segue nicely into a discussion of grooming behaviors.

Recommendation 17: *Recognize warning signs in others.* Consider expanding the description of behavioral warning signs that an adult may be grooming a child or teen. The document produced by Stop It Now! is excellent in describing typical grooming behaviors (warning signs). It also offers pointers on how to discuss your concerns with the person. Consider including more written or video-taped scenarios of adults interacting with youth in questionable ways and have the group discuss these as possible boundary violations. Role-play how to discuss concerns with the person in question, and discuss when to seek consultation.

Recommendation 18: *Experiential Activities.* As much as possible, incorporate videos and role-playing, particularly for learning how to: 1) sensitively talk with adults (including colleagues) or teenagers who may be exhibiting questionable behaviors with children; 2) hear and respond to someone who discloses abuse; 3) report the incident(s) in accordance with reporting policy; and 4) respond during confession to someone admitting to sexual abuse. I note in your power-point slide presentation (Spring 2012) you include three scenarios; three children present with concerning behaviors. Consider adding more scenarios to address the topics mentioned above. This might also be a perfect opportunity to ask survivors of clergy abuse to share their suggestions with seminarians for how to sensitively respond to youth who disclose abuse.

Recommendation 19: *Include Clergy Examples.* Consider including clergy-abuse cases in your instruction. Your seminarians could learn a great deal from the John Jay College reports, along with several movies (e.g., *Doubt*), documentaries (e.g., *Twist of Faith*), books (e.g., *Betrayal*), studies (e.g., Flynn, 2008; Isely et al., 2008) and websites (e.g., SNAP). These materials can be used to facilitate discussions of how priests groomed their victims (using spiritual manipulation), their vulnerabilities, what stressors they were experiencing, what reduced their inhibitions and facilitated the abuse (e.g., alcohol, pornography), and what situational opportunities the priests had to abuse the children (see review of this information in Chapter II). Consider asking clergy-abuse survivors to describe how perpetrators can damage the individual's physical and mental health, social and emotional well-being, oftentimes resulting in the loss of faith.

Recommendation 20: *Ethical Boundary Training.* I consider this to be the core concept for all the training you do with seminarians. You might review additional ethical-boundary training materials developed for seminarians and clergy. There are a number of ethics-based organizations with resources available for purchase to help your seminarians learn about boundary violations. (For example, see mcgrathinc.com; ethicsed.com; and FaithTrustInstitute.org). From their website, it appears that Faith Trust Institute offers clergy ethics materials addressing morality, although I have not reviewed these materials.

Recommendation 21: *Accountability/Evaluation.* Consider developing an assessment process to use with various groups, assessing knowledge of reporting duties and documenting seminarians' responses to the four questions asked at the conclusion of the online training program (Educating for Safe Environment) (see Appendix B, Standard 6.m).

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Appendix A

EVALUATION of *Keeping Our Promises*

Recommended Concepts/Skills	When/How are Concepts/Skills Taught? Legend: PreK-K= Kindergarten; Grades include 1-3; 4-6; 7-8; 9-12.
Self-Identification (Child knows his/her name, address, parents' names, telephone numbers, etc.)	
Bodies are Special. I am special. My body is special. Need to take care of body. Describe what bodies can do. Develop positive self-image. Appreciate differences (We are all different; each child is special and unique).	K: Bodies are a gift from God; Bodies can do many things; Need to take care of our bodies; I am special 1-3: Our bodies are sacred; We must care for our bodies; Human body is gift from God; Bodies can do many things 4-6: Our bodies must be cared for and cherished; Each person has special gifts and talents; Each of us is unique and special; 7-8: Human body is gift from God
Genitals are Special Parts of Bodies. Know how to identify the private parts/special places of their bodies (genitals and breasts). Teaches correct terms for genitals. Private parts are special, belong to them. Need to take care of genitals, are important parts of body. Children able to name all parts of body and understand their functions. Prepare for puberty.	1-3: Areas of body covered by bathing suit are considered private. Name basic body parts (genitals not included)
Body Ownership/Rights. Children have the right to control what happens to their bodies and to protect their bodies. (e.g., My Body Belongs to Me; I'm the Boss of My Body). Teen: No one has the right to force, coerce, bribe, trick, threaten, or manipulate another person into any type of sexual activity.	K: Need to protect our bodies; 1-3 Our bodies belong to us
Not OK to touch other people's private parts (You should not touch another child's body in any way without their permission. You should not touch someone else's private parts. "No one is allowed to touch or look at your private parts, and it's not okay for you to look at or touch somebody else's private parts.") Teen: "You do not have the right to touch someone else's body without that person's permission. It is never acceptable to force, coerce, bribe, threaten, or manipulate another person into any type of sexual activity." Explain to teen that it is wrong (and a crime) to force or trick anyone, including a child, into sexual activity. Make sure teens know that	

sexual contact with children is abuse, not play, and that it is a crime and harms children.	
Children Have Rights. Right to feel safe, be safe, be respected. Live without fear, violence. Right not to be abused. With teen, "You are a special person who deserves to be treated with respect and not to be abused-physically, emotionally, or sexually. No one has the right to force, threaten, or trick you into having sex of any kind."	
Rights to Privacy. Privacy is defined (e.g., private means keep out; rightful lack of sharing; protection from intrusion; implies self-ownership, personal boundaries/space)	1-3: Respect privacy in self and others 4-6: Respect personal space of others
Healthy Sexuality. Know how to identify the private parts of their bodies (genitals and breasts). Teaches correct anatomical terms. Acknowledge touching private parts can feel good. ("It's OK for you to touch and look at your own private parts, as long as you do it in private, when no one else is around.") Sexuality development covered in higher grades.	1-3: Parts of bodies covered by bathing suit are private.
Safety rules. (not going places alone, general safety principles)	K: Wear helmets while biking; Trusted adults should always watch them; Never talk to/go with strangers; Obey parents, teachers 1-3: Always be with a trusted adult; What makes a situation safe (a safe place is one where they can be themselves); Discuss family, school, playground, church rules. 4-6: Define safe environments; Learn strategies for unsafe environments (buddy system, trusting instincts) 7-8: Define safe environment at home, school, church, etc.; Two-adult rule; Certain behaviors are not acceptable; Buddy system pairing older with younger student 9-12: Procedures to follow in crisis situation; Safety instructions and policies
Body Safety Rules/Rights re: Private Parts. Curricula is explicit and rule-based (not feelings-based) for younger children. (e.g., "No one is allowed to touch/look at/take pictures/videos of private parts.) Teen language focuses on rights: "No one has the right to touch the private areas of your body without your permission. No one has the right to force, coerce, bribe, threaten, or manipulate you into engaging in any type of sexual activity."	
Distinguish between Appropriate/Inappropriate Touches (safe vs. unsafe; OK vs. Not OK; Avoids "good/bad" or "confusing" touch references). Specifically addresses touches of private parts, covering	K: Touches they like and do not like; If we're uncomfortable with touching, tell parents; 1-3: Good, Bad, Confusing (unsure) touches 4-6: Good, Bad, Confusing touches 7-8: Good/Bad touch with peers, children,

<p>OK/appropriate/safe touches (for health, hygiene, or safety reasons)</p> <p>Define Harmful/Illegal Sexual Behaviors. Describe inappropriate touches of private parts and violations of boundaries by teens and authority figures (e.g., improper touching, showing pornographic material, talking to them about sexuality, telling sexual jokes, making sexual comments, being asked personal questions, sexual harassment, constantly texting or calling, sexting). With teens, stress feelings, consent, coercion, disrespect, rights, exploitation, empathy, potential legal consequences.</p>	adults
<p>Boundaries (e.g., identifying personal boundaries; respecting and not violating others' boundaries). Include boundary violations when describing grooming.</p>	<p>4-6: Respect personal space of others; Know when, where and how to touch another person; Respect rights of others 7-8: Understand responsibility to share their boundaries 9-12: Definition of appropriate and inappropriate boundaries; adult/student boundaries; consequences for false reporting; responding when boundaries are violated</p>
<p>Describe Offenders. (Strangers, family member, neighbor, babysitter, teacher, etc.) Offenders can be adults of any age, size, race, male and female, and also teenagers. Can be "strangers" but most likely to be people they know or love (family members, acquaintances, authority figures). Mentions a variety of authority figures, including people in the teaching setting.</p>	Students warned about strangers
<p>Describe Potential Victims (examples should include both males and females of all ethnicities, ages, sizes, and abilities)</p>	
<p>Teach Resistance Skills. How to Respond to potentially abusive situations. (e.g., Refuse, Try to get away, Tell)</p>	Responding to sexual abuse not included
<p>Verbally Refuse. "If somebody tries to touch your private parts, say, 'No!' or 'Stop it!' or 'That's wrong!' or 'That's against the rules!' With most children above the age of seven, you can phrase the rule as "Say 'No' to anyone who tries to break one of your body-safety rules." With teen, "You have the right to refuse any sexual request made of you." Teens benefit from learning and practicing caring ways to refuse and respond to sexual advances.</p>	<p>1-3: Practice saying NO and STOP THAT! 4-6: Practice saying "no" and "stop that!" in unsafe environments</p>
<p>Get Away & Tell. "If someone tries to touch/look at your private parts, try to get away from that person, and most importantly, tell someone else what happened, even if the person tells you to keep it a secret." With teen, "If someone tries to push you into doing something</p>	<p>1-3: How to leave a situation or place that is unsafe; practice leaving a situation which feels unsafe.</p>

<p>sexual, try to get away from the person and then tell me or another trusted adult." With teens, talk about how difficult it is to tell. Prepare teens for disclosures from friends.</p>	
<p>Grants permission/right to disobey authority figures. OK to say NO to adults, teenagers. Your body is your own, you have the right to say 'no' to touches/hugs/kisses.</p>	<p>K: Obey parents, teachers, other trusted adults, to keep safe. (Obedience to trusted adults assures safety) 1-3: Know it's OK to disobey an adult who asks for something the student knows is wrong</p>
<p>Respect of self, others</p>	<p>1-3: Respect privacy in self and others 4-6: Law of Love in terms of respect for self and others; Catholic Church teaches respect for life 7-8: Demonstrate respect and kindness to self and others; Respect others' differences; Discuss historic moments of disrespect; Law of Love essential to respect God, self and others 9-12: Respect personal privacy and personal space</p>
<p>Encourage Disclosure/Asking for Help. (Always tell an adult for younger children; How to identify adults who can help; importance of talking to an adult if something bothers them; for teens, peer educators/counselors, how to help a friend who discloses)</p>	<p>K: Identify trusted adults; characteristics of trustworthy adults; tell parents or teachers if bullied 1-3: Make a list of trusted adults, with whom to share important info; tell if bullied 4-6: Tell trusted adults about secrets 7-8: Importance of appropriate disclosure; tell someone in authority if it is hurtful to you 9-12: Importance of confiding in a responsible adult; Confidentiality; Importance of truth telling, not embellishment</p>
<p>How to Report. Child knows how to report (knows to include who the person is and what she/he tried to do)</p>	<p>1-3: Practice telling/role play what needs to be told (secrets)</p>
<p>Identify Safe Adults/Support System. Child has several safe adults he/she could tell, both inside and outside the family. Child knows to tell someone else if the abuse continues (keep telling until someone is able to help you). Help children plan on what to do if the person that they choose to disclose to doesn't believe them. (Who else could they tell?).</p>	<p>K: Identify trustworthy/trusted adults 1-3: List trusted adults 4-6: Know who can be trusted. Even trusted adults may not always be safe. 7-8: Identify trusted adults. Characteristics that make a person trusted and not trusted.</p>
<p>Help a friend. Teach children and teens what to do if a friend discloses abuse.</p>	
<p>Responsibility. (Never a child's fault) Never a victim's fault. With teen, "Even if you cannot stop the person, it is never your fault. Sexual abuse is always the responsibility of the abuser." Sexual abuse is never the fault of the victim, even if [you were drinking, you were</p>	<p>K: Not your fault if bullied 7-8: Not your fault if innocent victim</p>








wearing a sexy outfit, you had sex before, you were doing something you shouldn't have been doing]	
Secrecy. Young children: Never keep secrets. Especially, "Never keep secrets about someone touching or looking at your private parts." Older kids can be taught difference between safe and unsafe secrets. Teens can discuss keeping information private or confidential. With teens, discuss when secrets cannot be kept, and when they need to break confidentiality. Encourage family to institute a "no-secrets" rule (Parent tells child, "We don't keep secrets in our family"). OK to keep surprises. Teach difference between secrets (binding, never revealed) and surprises (temporary, will be disclosed).	K: Never keep secrets; difference between a secret and a surprise; Tattling vs. telling to help 1-3: Never keep secrets; Distinguish between private/public info and secrets 4-6: public/private info; good/bad secrets; list positive/negative consequences for telling a secret; identify good secrets which might need to be kept 7-8: Distinguish between "ratting out/tattling" vs disclosing info to help a friend; distinguish public/private 9-12: Difference between public/private information; consequences of gossiping
Bribes/Threats. Child understands offender may use bribes, threats; child knows how to respond to bribes/threats.	
Photography/Digital/Internet/Pornography. Inappropriate/unsafe behaviors do not always involve touching, can also include showing/taking pictures/movies. "No one is allowed to take pictures or videos of your private parts or of you doing anything when you're naked (e.g., going to the bathroom, dressing, bathing)" For Teens: "It's a crime for an adult to take pictures or videos of your naked body." Discuss "sexting" and be sure teens know it is illegal. Discuss pornography and how child pornography is illegal and a form of sexual abuse. Young children: "It's not OK for you to look at pictures or movies of people who are naked." For Teen, "It's illegal for adults to show you pornography."	7-8: Availability of pornography on Internet;
Teach decision-making skills. Problem-solving skills.	4-6: Making good choices and bad choices 7-8: Learn problem-solving skills re: bullies
Opportunities to Practice (e.g., "What would you do if...") Teachers take advantage of teachable moments during classtime/recess/etc.	PreK & K: What if game (secrets) 1-3: Practice telling (secrets) 4-6: Practice standing up to a bully 7-8: Practice responding to bullies
Bullying. Including cyber-bullying.	Covered K-12
Harassment. Includes sexual harassment/bullying.	4-6: Define harassment; state/federal laws protecting from harassment 9-12: Define harassment; Ramifications of harassment
Staying Safe Online. Risks related to security and identity theft, unwanted exposure to sexual material, risks of criminal charges for sending sexually explicit pictures, potential for contact with cyber sexual predators.	9-12; Consequences of abusing technology, e.g., identity theft)





Consent. Define it, understand power dynamics in relationships	
Sexual Exploitation. Define it "It's when one person uses another person to get something sexual, without regard for that person's feelings or safety." Being tricked, taken advantage of, and used by another person. Understand how it violates individuals' rights, recognize how it hurts, explore its social influences, differentiate it from respectful sexual relationships. Describe power imbalance at core. Manipulated to gain their compliance for sex. Stress that sexual contact between an adult and a minor is a crime, even if the child is willing, since minors are legally incapable of consenting to sexual activities with adults.	
Describe Grooming. Help teens understand how adults can exploit their sexual curiosity and take advantage of their normal needs for affection, intimacy, and companionship. Describe inappropriate behavior or violations of boundaries by an authority figure (e.g., improper touching, showing them pornographic material, talking to them about sexuality, constantly texting or calling).	
Relationships. Focus on healthy relationships. Commitment to non-violence in relationships.	Focus on unhealthy relationships (rape)
Dating Rights and Responsibilities.	






PROGRAM PRESENTATION	
Developmentally appropriate (concepts and activities are age appropriate, respects the developmental abilities and limitations of children at various ages; avoids abstract concepts)	
Gender appropriate	
Inclusive (culturally appropriate materials, relevant names; inclusive of and relevant to youth with diverse life experiences) (translated)	
Appropriate for children's abilities/limitations	
Repeated presentations (exposed to messages on ongoing basis; multiple sessions)	
Opportunities for Practice (behavioral rehearsal; role playing)	
Includes Parental Involvement (e.g., invite parents to information night; include parents in program, send homework, assignments, lessons home; parents as teachers; give feedback on lesson plans; provide child protection books/materials/videos for parents to borrow)	
Positive Approach: Skills-based, rather than fear-based.	
Materials are interesting, effective	
Includes Evaluation (questionnaires, interviews)	
Includes Follow-up evaluations to determine retention of knowledge, skills	
Youth provide input into program (content, process)	
Youth have opportunities to make suggestions/share concerns/disclose, with confidentiality	
Active Learning Opportunities (e.g., group discussion, create posters; reflection, skills practice)	
Whole-School Learning Approach	
Involves Teachers and Parents (Parents and teachers are prepared to support and reinforce lessons; prepared to respond to student concerns or disclosures)	
Teachers Adequately Prepared and Supported (some teachers lack confidence; some are survivors of sexual abuse)	


Appendix B

CSA PREVENTION EVALUATION TOOL FOR ORGANIZATIONS:**Evaluation of Diocese of Wilmington's Child Protection****Policy & Procedures**

General Policy Standards	Included/Addressed
a. Policy is written in a clear and easily understood way. (Evidence: Copy of policy)	
b. Policy contains definitions of key terms (e.g., Sexual Abuse; Minor)	
c. Policy is publicized, openly displayed, promoted, and distributed to everyone involved with an organization. (Evidence: Circulation list to show distribution)	 Entire manual is provided online.
d. States Purpose: Agency's commitment to create safe environments for children and protect them from harm (welfare/safety of youth is paramount; values children, youth)	
e. States Principles underlying standards: (e.g., all children have the right to protection and safety; right to protection from harm; to an environment free from violence, abuse, harassment, and discrimination; integrity in relationships (treat each other with integrity and respect); Everybody has a responsibility to support the care and protection of children; Guided by what is best for children)	 "Misconduct violates the respect to which all persons have a right." In light of (sexual abuse) scandals, bishops determined that "a much stronger and more comprehensive approach throughout the Church to ensure the protection of children and youth" was needed.
f. Describes "zero-tolerance" for any type of abuse, including sexual abuse (physical, emotional, or sexual abuse or neglect of any kind is totally unacceptable)	 "Diocese deplores the harm"
g. Policy is approved and endorsed by relevant management/oversight body	Approved by Bishop of Wilmington, W. Francis Malooly
h. Policy specifies to whom standards apply (e.g., mandatory for staff and volunteers)	 "All church personnel, priests, deacons, religious, paid employees and members of the volunteer corps"
i. Developed in collaboration with many stakeholders (e.g., children, parents, law enforcement, legal counsel, experts, child protective services)	July of 2002 three committees were appointed to respond to USCCB charter. Committees were composed of 40 lay men and women, priests, and staff.
j. Staff, parents, and youth contribute to policy development.	
k. Policy is reviewed/updated on regular basis. (e.g., every three years or whenever there is a major change in the organization or relevant legislation) (Evidence: Timetable for review)	

l. Processes/mechanisms are in place to consult children and parents as part of the review of safeguarding policies and practices. Steps are taken to seek users' views on policies and procedures and how they are working.	
m. Identifies person(s) responsible for implementing/reviewing policy and procedures. Evidence: Job Description	Diocesan Safe Environment Coordinator has overall responsibilities as listed in Job Description. Compliance Coordinator is responsible for filing background checks. Compliance Oversight Cmte monitors the level of compliance within the Diocese and reviews program/policies (6-member)
n. Information about where to go for help and contact details for designated contact person, local social services department, police, and emergency medical help are readily available.	 Contacts provided for Delaware and Maryland (p. 40 in manual)
Standard 1: Safe Screening and Hiring Practices	
a. There are policies and procedures for recruiting personnel and volunteers. (Evidence: Copy of Recruitment Policy & Procedure)	NOTE: I did not review the Hiring Practices Manual
b. All adults (employees/volunteers) who have the opportunity for regular contact with children, or who are in positions of trust, have criminal background checks and complete screening form.	
c. Agency has a standard written application form. (Evidence: application form)	 Background Screening Form
d. Criteria for acceptance/rejection have been identified. (lists non-negotiable minimum standards for rejection/which offenses automatically disqualify applicants; history of CSA? violence? substance-related problems/substance-abuse treatment? use of child pornography? paraphilias [pedophilia, exhibitionism, voyeurism, frotteurism]? major mental disorders? prior inpatient psychiatric treatment?)	No person who is convicted of a violation of criminal law will be hired. (School Personnel; Volunteer) Disqualifying offenses for all Church personnel listed on p. 13 (Felony/Misdemeanor offense against person, family, public order, controlled substances)
e. Person(s) responsible for screening, interviewing, reference checks, hiring, etc. have been identified.	Internal processing by Human Resources, reports to HR Director. Compliance Officer manages background checks, shares and maintains records of Cleared For Service certificates . Review Panel of attorneys review questionable reports.
f. Policies and processes for screening and selection are stated and systematically followed.	
g. Background checks are repeated on a regular basis.	Every 5 years
h. Applicants are asked to disclose previous criminal histories of sexual offenses, violence against youth, and other criminal offenses (felonies? misdemeanors?). All candidates are asked if	1. Asked if ever been arrested for or convicted of a misdemeanor or felony offense. 2. Asked if ever

there has ever been any investigation or action taken against them for any ethical, moral, legal, or malpractice action. Have you ever been censured, disciplined, dismissed, expelled from, been put on probation, or been requested to resign or withdraw from any professional school, internship, volunteer program, employment, or training program? Have you ever been asked to leave a youth-serving organization in the past?	been convicted of driving while under influence of alcohol/drugs, driving while impaired. 3. Have you ever been dismissed or suspected from any activity, program, project or event providing services to youth. 4. Has your driver's license ever been suspended or revoked?
i. Personal interviews are conducted, with specific questions asked of all applicants.	
j. Application asks for work history and names of people who are willing to endorse the applicant. Reference checks are conducted, with all work/volunteer experience carefully verified.	
k. Verbal contact is made not only with the people listed on the application, but also people mentioned by those references.	
l. Criminal background checks are conducted on all employees and volunteers who have contact with minors.	 Includes fingerprinting for school employees.
m. Sex Offender Registries are checked for all employees and volunteers who have contact with minors.	11/04 memo states Delaware only investigates at state level (no FBI check, no sex offender registry check, but Manual F states Delaware's Sex Offender Registry is checked).?
n. Applicant signs a permission form for conducting criminal background checks.	
o. Agency keeps the results of criminal background checks confidential (secure storage location, limited access to files).	 Diocesan Safe Environment Coordinator manages the criminal background checks, maintains permanent files. Only HR Director and applicant receive copies. School personnel reports are kept in the school.
p. Informal Internet searches are conducted as a way to find additional relevant information about an applicant.	
q. Code of Conduct is shared with all applicants. Applicants asked if they agree to abide by the Code of Conduct.	
r. Applicants' home environments are assessed (for mentoring programs where youth meet with mentors at their homes)	
s. No contact with youth is allowed until applicant has been approved.	
t. Agency lets applicants know (verbally and in writing) that the program's priority is the safety and well-being of children.	
u. There is an induction process for all staff and volunteers which includes familiarization with the child protection policy and procedures.	

Standard 2: Code of Conduct	Ethical & Behavioral Standards
a. Contains input from constituents: Staff, parents, youth are consulted in developing codes of behavior.	Committee Members (pastors, educators, therapists, medical professionals)
b. Written Code of Conduct, which provides clear guidance on acceptable/expected standards of behavior of adults toward children	 Standards for Ethical and Behavioral Norms & Volunteer Covenant
c. Agency lists ethical conduct/appropriate behaviors (behaviors to be encouraged). States responsibility of adults and children to treat one another with dignity and respect.	Appropriate affection between Church Personnel and minors is important for a child's development (gives examples). Respect the dignity of each person. Treat everyone with respect, integrity, dignity, courtesy.
d. Agency lists unethical conduct/inappropriate behaviors or boundary violations . Specifies disrespectful/unsafe/harassing behaviors (i.e., makes it clear that discriminatory behavior or language in relation to any of the following is not acceptable: race, culture, age, gender, disability, religion, sexuality, or political views). Evidence: Code of Conduct specifically prohibits certain behaviors (hitting or physically assaulting children; having intimate, romantic, or sexual relationships with children; showing porn to children; exploiting children to meet emotional or sexual needs; asking youth to keep secrets; offering/procuring alcohol, cigarettes, drugs)	Church Personnel will not physically, sexually or emotionally abuse or neglect any person. Priests must not initiate sexual behavior and must refuse it even when other person invites it. Avoid all forms of discrimination. Lists examples of inappropriate forms of physical affection (for Church Personnel & Volunteers). Volunteer Covenant prohibits touching a child and/or youth in a sexual or other inappropriate manner.
e. Clear statement of the need to set and maintain professional boundaries with youth. Recognizes power imbalance, clear statement to avoid exploiting or taking unfair advantage of youth.	Church Personnel will avoid taking unfair advantage of youth for the benefit of themselves or others. "Employees will avoid relationships that could impair professional judgment, create conflicts of interest, or lead to exploiting the relationship for personal gain." Recognize unique power they have over youth. Avoid any abuse of ministerial power. Avoid exploiting the trust of those seeking service by not using them to satisfy their needs for attention and pleasure. Volunteer Covenant: Avoid any conduct which exploits another.
f. Policy addresses need for adults to monitor their emotional status and nurture appropriate friendships, reducing stress, keeping healthy, guarding against substance abuse. Recognize warning signs indicative of boundary violations.	Church Personnel advised to keep physically and emotionally healthy, guarding against substance abuse, and nurturing appropriate friendships. Heed warning signs when they may be approaching boundary violations.

g. Policy addresses one-on-one interactions with youth (e.g., being alone with a child in an area that cannot be seen or observed by other adults; taking children to your own home, to restaurants, or traveling alone with a child in a car) Two-adult rule	Church Personnel will not allow minors to stay overnight. Physical contact with minors should never be in private or when not observable. Two-adult rule
h. If applicable, policy addresses high-risk situations (e.g., bathing/showering, changing clothes, bathroom activities, sleep-overs)	Church Personnel do not allow minors to stay overnight. ?Guidelines for coaches?
i. Policy addresses out-of-program contact restrictions (e.g., socializing with youth outside of agency-sponsored activities).	
j. Addresses discipline practices (that do not involve physical punishment or any other form of degrading or humiliating treatment)	Church Personnel and Volunteers are prohibited from using physical discipline in any way (lists examples)
k. Adequate adult/child ratios. Clear guidelines that specify under what circumstances--if any--staff are allowed to be alone with a child.	Stated ratios of adults/youth. Never one adult working alone with youth, unless can be observed by others. Volunteer Covenant refers to "following the two-adult rule."
l. Describes responsible use of the Internet	
m. Addresses taking photographs/videos of youth (including mobile phones with cameras)	
n. Provides guidelines on contacting/communicating with youth via technology (use of social media, emails, mobile phones)	Diocese reserves the right to inspect, monitor use of computers, telephone, e-mail; E-mail must not be used for sending or storing discriminatory, harassing, obscene, X-rated material,
o. Guidelines regarding communication/language with children. (e.g., self-disclosure; personal/intimate topics; secrecy; sexual topics), and conduct (gift giving)	Church Personnel will exercise prudent judgment in the giving of gifts.
p. Prohibits the display or distribution of sexually suggestive or pornographic material	
q. Policy regarding transporting students/youth.	✓
r. Policy outlaws use, possession, or distribution of illegal or unauthorized drugs. Furnishing or encouraging minors to use, possess or unlawfully distribute alcohol, tobacco, illegal or unauthorized drugs.	Volunteer Covenant prohibits use, possession of alcohol, drugs.
s. Code contains guidelines relating to adult-child physical contact.	✓ For both Church Personnel & Volunteers, lists lengthy hugs; kisses; touching genitals, chests, bottoms; sleeping with; wrestling, tickling, piggyback; massages; compliments re: appearance/physical development.
t. Code specifies staff/volunteer responsibilities for reporting suspicions/concerns about child maltreatment.	✓



<p>u. Code outlines Sanctions for Breaching: (e.g., Contains a statement "I have read and understand the Policy and agree to be bound by the provisions contained within. I understand that violations involving sexual relations with a student, sexual abuse of a student, or communication with a student of a sexual or romantic nature, shall result in dismissal, prompt notification of law enforcement and social services if required by state law, and in the case of an employee or volunteer licensed by a Board of Professional Licensing, the initiation of a complaint against the license.")</p>	<p>Volunteer Covenant states that violations may result in my removal.</p>
<p>v. All personnel are required to abide by standards. Evidence: Applicant signs/dates statement "I agree to abide by/adhere to Code of Conduct".</p>	<p>All Church Personnel are required to abide by these Standards. Clergy submit Acknowledgement of Receipt Form & volunteers submit the Volunteer Covenant. Volunteer Covenant states "I promise to strictly follow these Behavioral Standards." Employee form states "I agree to abide by these Standards and conduct myself in complete accordance with them." Forms are only signed at the time of hire. School employees required to sign a form indicating ethical norms/standards for conduct.</p>
<p>x. Arrangements are in place to monitor compliance with child protection policies and procedures.</p>	<p>Standards are incorporated into the annual performance review of employees, seminarians, and deacons, but priests review the Standards every five years.</p>
<p>y. Standards/Code of Conduct reviewed periodically and updated as needed.</p>	<p>Standards may be reviewed and revised periodically at the direction of the Bishop.</p>
<p>Standard 3: Implementation and Monitoring</p>	
<p>a. Written plan showing what steps will be taken to keep children safe, who is responsible for implementing these measures, and when/how often monitoring will occur.</p>	
<p>b. Defines roles and responsibilities for implementing Plan and for monitoring both implementation and interactions between youth and adults.</p>	
<p>c. Audit procedures are in place for monitoring the extent to which policies and procedures and all training programs are being implemented (method of demonstrating accountability and transparency).</p>	<p>Re: compliance with criminal background check requirements, all departments are audited annually. Diocesan Compliance Oversight Committee has responsibility to monitor the level of compliance.</p>
<p>d. Documentation that monitoring has occurred (using written</p>	

records).	
e. Uses formal supervision including periodic evaluations. (e.g., annual appraisal of staff, review of volunteers)	
f. Uses informal supervision (random observations)	
g. Institutional climate encourages professionals and volunteers to keep their eyes open for potentially problematic adult-youth interactions and share their concerns with and confront a colleague about those concerns.	
h. Agency provides therapeutic supervision (i.e., encourage and support the recognition of personal needs like loneliness and how they may be affecting professional relationships; acknowledging emotional/sexual feelings toward clients; climate of trust in which staff feel free to disclose feelings and experiences to their supervisors)	
i. Agency provides multiple opportunities for youth and staff to give/obtain feedback and seek support (e.g., peer mentoring)	
j. All incidents, allegations of abuse and complaints are recorded and monitored. (Evidence: Summary of number of incidents of abuse and number of complaints)	
Standard 4: Ensuring Safe Environments	
a. Ensure spaces are open and visible (windows in doors; "no-closed door" policy).	☑
b. Provide youth with privacy when toileting, showering, changing clothes.	
c. Install surveillance cameras in difficult-to-supervise public areas.	
d. Parents are allowed/encouraged to visit the agency unannounced at any time (open-door policy)	
e. Policies in place for field trips/off-site activities.	☑
f. Written parental consent is required for special events (e.g., overnight, field trips)	☑
g. Transportation policies established and monitored.	☑
h. Safe-environment policies are advertised throughout environment. Climate where youth safety is priority.	☑
i. Child protection policy is openly displayed and available to everyone, and is included in staff handbooks along with student and parent handbooks.	One of 3 elements contained in program: Guidelines for establishing and maintaining safe environments in our parishes, schools, and other institutions.
j. Children are aware of their right to be safe from abuse and who to speak to if they have worries or concerns.	☑

k. Agency creates a climate that encourages guardians/staff to question concerning or confusing behaviors or practices.	
l. Children have an advocate/officer/ombudsman to represent them.	
Standard 5: Investigating & Reporting Concerns, Disclosures, Allegations	
Purpose: to provide clear guidance on what to do when a child protection concern arises. Goal: to respond quickly and appropriately to 1) inappropriate or harmful behavior, 2) violations of any policies, and 3) allegations and suspicions of harassment and sexual misconduct.	The Diocese deplores the harm and injury individuals and families suffer because of anyone's misconduct. Such misconduct violates the respect to which all persons have a right.
a. All employees and adult volunteers are aware of their obligation to report suspected abuse or neglect. (Are there any professional mandated reporters who are exempt from this reporting requirement? Attorney-client privilege and confidentiality? Religious privilege to Ministers/Clergy/Priests?)	Copy of state reporting law available at each agency site. All new employees receive orientation in child abuse reporting. School employees required to sign a form annually indicating they are aware of reporting responsibilities.
b. All employees and adult volunteers are trained in recognizing obvious signs and symptoms of abuse but also more subtle signs (crossing boundaries; grooming behaviors)	Obvious signs/symptoms are taught.
c. All adults are trained in how to respond to a child who discloses abuse or questionable behavior. (List of do's and don'ts)	
d. Staff, parents, and youth are trained in reporting concerns, suspicions, allegations about unacceptable behavior.	
e. Youth have opportunities to report/describe concerning behavior directly (e.g., to a Children's Ombudsman) and indirectly (e.g., a suggestion box to make suggestions or complaints). Children are provided with information on where to go to for help and advice in relation to abuse, harassment and bullying. (Evidence: Copies of information for children about sources of support)	24-hour telephone number to call (both Child Protective Services and Victim Assistance Coordinator)
f. There are clear written procedures providing step-by-step guidance on what action to take if there are concerns, allegations, suspicions, or disclosures of abuse (historic or current).	According to Revised Policy: If cleric , 1. Immediately report to civil authority. 2. Notify Bishop office & Attorney General 3. If state elects not to investigate, the Diocesan Review Board serves as confidential consultative body in conducting an internal investigation 4. If priest, the Pastor advises Vicar General. If Pastor, employee contacts Vicar General. If non-clergy , 1. Immediately report to civil authority; 2. Notify Pastor, who consults with Vicar

	<p>General for Administration School employees: 1. report to civil authority and Principal. Principal notifies Pastor & Superintendent of Schools, and Pastor notifies Vicar General for Administration. No flow chart.</p>
g. There is a designated person/person(s)/officer (Designated Officer and Deputy Officer if possible) (key point of contact) with clearly defined role and responsibilities for receiving complaints, reports, suspicions, or concerns. (Flow Chart)	<p>Only names Bishop or Chancellor. Victim Assistance Coordinator arranges services for victim No flow chart</p>
h. Chain of Reporting clearly described; includes Designated Officer passes information on to Civil authorities. Contact details for local social services and police are included. (Evidence: Flow chart)	<p>No flow chart. Section Four (Resources) under 4.05 describes reporting laws, contact numbers.</p>
i. Designated Officers consult with Child Protective Services/Law Enforcement about all allegations/disclosures.	<p>All cases of credible allegations are reported to civil authorities.</p>
j. There is a process for recording all incidents, allegations, concerns, suspicions and referrals and storing these securely and maintaining confidentiality. (Evidence: Child Protection Recording Form; General Incident Reporting Form)	<p>All information retained in a confidential manner at the direction of the Vicar General; files entrusted to diocesan officials, not to be retained in any other office.</p>
k. There is a process for dealing with complaints made by parents and children about unacceptable and/or abusive behavior toward children, with clear time tables for resolving the complaint.	
l. There is guidance on confidentiality and information-sharing which makes clear that the protection of the child is the most important consideration.	<p>Communications policy stresses respect for civil and canonical rights to privacy and protecting the reputation of all individuals involved; Need to keep investigation confidential.</p>
m. Clearly stated guidelines for conducting an internal evaluation of complaint (of limited scope). Delineates what behaviors the agency will respond to internally and what behaviors require reporting to authorities.	<p>1. Vicar General or Chancellor begins preliminary investigation. 2. Gives findings to Bishop 3. Review Board offers recommendations to the Bishop</p>
n. Maintain Records: Every referral should be documented, and a file should include a log of actions, events and information received. Any information/observations in connection with the case should be documented and included in the personnel file.	<p>(For employees) Reports are kept in a sealed envelope in the employee's personnel file.</p>
o. Identifies who has responsibility for contacting the family of alleged victim and describes if, how, when, and by whom all families are notified. (unless the parent or guardian is the one against whom the complaint is made)	<p>If by Church personnel, Diocese's Victim Assistance Coordinator arranges for counseling, assistance If by Lay/Volunteer, the supervisor contacts victim and family to offer care. If by school personnel, Pastor makes arrangements to notify parent.</p>
p. Provides guidance on how to respond to and support a child	<p>Pastoral and psychological care of</p>

who is suspected to have been abused.	abused child and family is made available when and where appropriate.
q. Arrangements for providing supervision and support to staff and volunteers during and following an incident or allegation. Provides information and support to individuals both during and following an incident or allegation of abuse. Provides referrals, reimbursement for counseling, restorative justice, a list of professionals and organizations that provide assistance. (Evidence: List of contacts for advice, information, therapy)	
r. Clear guidance for responding to media/press.	
s. Clear plan for alerting parents of students when there is a credible allegation against staff/volunteer.	
t. Clear plan for immediately eliminating contact between accused and youth during investigation.	<ol style="list-style-type: none"> 1. If clergy, accused immediately placed on administrative leave (defined as prohibited from functioning in formal capacity). Does not specifically prohibit contact. 2. If non-clergy, specifically directed not to contact alleged victim or family. 3. If employee/volunteer of parish, he/she shall be removed from all possible contact with children until exonerated.
u. Whistle-blowing retaliation prohibited: No one who brings an accusation in good faith will be subject to any adverse action for doing so.	Laws of Delaware and Maryland provide that persons making reports in good faith are immune from civil and criminal liability.
Standard 6: Training/Educational Programs	
a. Agency has developed and implemented educational programs	Important element of Program: Training in professional standards (Ethical and behavioral standards for all Church Personnel)
b. Agency has specified person(s) whose responsibility it is to provide education.	Coordinator of Safe Environments provides periodic education for all church personnel.
c. All adults who have contact with children and youth are required to participate in training.	All Church personnel and all non-compensated personnel who have regular recurring contact with children and youth (5 hours or more a year) will be required to participate in the training.
d. Training is developed and delivered for Children, Employees/Volunteers, and Parents.	Brochures for Parents; Brochures for Volunteers; Brochures for Employees. Power-point presentation and video (Child Abuse, How to see it, how to stop it). Pre-K thru 12 curriculum (<i>Keeping</i>

	<i>Our Promises)</i>
b. All groups are educated about all forms of child maltreatment and in-depth coverage on sexual exploitation (causes, signs and symptoms, debunk myths about offenders, consequences of abuse, grooming behavior)	Physical, Sexual, Emotional Abuse & Neglect are covered in DVD. For sexual abuse, debunks myths, describes typical offenders (male, married)? Lists warning signs of Sexual Predator (?)
c. Training includes discussion of need for and guidance in how to establish and maintain professional boundaries with youth. (Almost all serious ethical infractions emerge from a context of escalating boundary violations.)	
d. Training of professionals includes discussion of how personal problems, needs, deficits, can result in over-involvement (boundary violations) with needy youth. Acknowledges power differential between adults and youth.	Ethical Standards for Employees: "Church Personnel will be conscious of the unique power they have in relationships due to the trust they are given"
e. Provides guidance in spelling out/setting boundaries and limits with youth. Trainees have opportunities to discuss and role play risky situations.	
f. Discussions about how sexual misconduct can have its beginnings in good intentions, but easy to cross boundaries. Help trainees recognize ethical conflicts and provide practice in responding to emotionally needy youth.	
g. Opportunities for careful self-examination/training in recognizing when personal needs or unresolved problems are affecting therapy/counseling (e.g., addictions, pressures of work/home, loneliness, need for physical contact, for belonging, adoration, connecting)	
h. Recognizing the rationalizations/cognitive distortions adults use to construe deepening involvement as something other than sexual misconduct (e.g., good for the child). Victim sensitization approaches can make it difficult for trainees to deny the harmful effects that sexual relationships have on clients/mentees.	
i. Provide candid testimonials from respected faculty/administrators who have encountered strong (sexual) feelings for their clients (serve as models for how to engage in an open, professional discussion of sexual issues)	
j. Discuss the need to prevent sexual feelings from evolving into ethical infractions. (Draw the line between feelings and actions)	
k. All groups are informed about how to recognize and intervene when they observe a colleague crossing professional boundaries (e.g., taking a student to lunch or dinner, giving gifts)	Ethical Standards state that Church Personnel have a duty to report their own ethical and professional misconduct and the misconduct of others.
l. All groups are informed about duty to report sexual misconduct.	
m. Training includes a means of confirming participation and completion.	Once trainee completes the online DVD Educating for Safe Environment, The Coordinator of

	<p>Safe Environment asks the trainee 4 questions: 1. What did you learn? 2. What was disturbing about what you learned? 3. What else do you want to know? 4. Do you want to have a conversation about the material? Upon receipt of trainee's answers to these four questions, the Coordinator sends confirming email certification. No documentation of responses to these 4 questions.</p>
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