

Abuse and Molestation Policy

Table of Contents

I.	General Definitions	3
A.	Types of abuse.....	3
II.	Code of Conduct with Student	3
III.	Policies.....	5
A.	Physical Contact.....	6
B.	Interaction.....	6
C.	One-on-One Interaction	7
1.	Tutoring/ Private Coaching:	8
D.	Off-site Contact	8
E.	Electronic Communication	9
F.	Gift Giving.....	10
IV.	Training Requirements	10
A.	General Training Requirements.....	10
V.	Monitoring and Supervision.....	11
A.	Facility Monitoring	11
B.	Checking Members into a Facility:.....	11
C.	Monitoring Student in Facilities	12
D.	Monitoring High Risk Activities	12
3.	Transportation Activities	13
4.	Off-Site Activities	14
5.	Overnight Activities	15
VI.	Responding	15
A.	Responding to Suspicious or Inappropriate Behaviors or Policy Violations.....	16
1.	Staff and Volunteer Response:	16
2.	Supervisor and Administrator Response:.....	17
3.	Organizational Response:.....	18
B.	Responding to Suspected Abuse by an Adult	18
Staff or Volunteer Response to Abuse:.....		18

Abuse and Molestation Policy

Supervisors and Administrators Response to Abuse:	19
Responding to Student-to-Student Sexual Abuse and Sexualized Behaviors	20
Student -to- Student Interactions:	20
Staff and Volunteer Response:	21
Supervisors and Administrators Response:.....	21
Organizational Response:	22
VII. Crisis Intervention Plan	23
Prior to Beginning of School Year	23
Beginning of School Year	23
Immediate Safety after an Allegation	23
Initial Communication Plan.....	24

Abuse and Molestation Policy

I. General Definitions

A. Types of abuse

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

II. Code of Conduct with Student

The following policies are intended to assist staff and volunteers in making decisions about interactions with students. For clarification of any guideline, or to inquire about behaviors not addressed here, contact your supervisor.

Genesis is committed to creating an environment for students that is safe, nurturing, empowering, and that promotes growth and success.

No form of abuse will be tolerated, and confirmed abuse will result in immediate dismissal from Genesis. All reports of suspicious or inappropriate behavior with students or allegations of abuse will be taken seriously. Genesis will fully cooperate with authorities if allegations of abuse are made that require investigation.

The Conduct with Student outlines specific expectations of the staff and volunteers as we strive to accomplish our mission together.

1. Students will always be treated with respect.
2. Students will be treated fairly, regardless of race, sex, sexual orientation, gender identification, age, or religion.

Abuse and Molestation Policy

3. Staff and volunteers will adhere to uniform standards of displaying affection as outlined by Genesis.
4. Staff and volunteers will avoid affection with students that cannot be observed by others.
5. Staff and volunteers will adhere to uniform standards of appropriate and inappropriate verbal interactions as outlined by Genesis.
6. Staff and volunteers will not stare at or comment on students' bodies (unless comments are specifically related to established physical fitness training and goals).
7. Staff and volunteers will not date or become romantically involved with students.
8. Staff and volunteers will not use or be under the influence of alcohol or illegal drugs in the presence of students.
9. Staff and volunteers will not have sexually oriented materials, including printed or online pornography, on Genesis' property.
10. Staff and volunteers will not have secrets with students and will only give gifts with prior permission.
11. Staff and volunteers will comply with Genesis's policies regarding interactions with students outside of our programs.
12. Staff and volunteers will not engage in inappropriate electronic communication with students.
13. Staff and volunteers are prohibited from working one-on-one with students in a private setting without supervisory approval. Otherwise, staff and volunteers will use common areas when working with individual students.
14. Staff and volunteers will not abuse students in anyway including (but not limited to) the following:

Physical abuse: punching, shaking, slapping, unnecessary restraints

Verbal abuse: degrading, threatening, cursing

Sexual abuse: inappropriate touching, exposing oneself, sexually oriented conversations

Mental abuse: shaming, humiliation, cruelty

Neglect: withholding food, water, shelter

Abuse and Molestation Policy

15. Genesis will not tolerate the mistreatment or abuse of one student by another student. In addition, Genesis will not tolerate any behavior that is classified under the definition of bullying, and to the extent that such actions are disruptive, we will take steps needed to eliminate such behavior.

Bullying is prohibited and defined by the state of Georgia. The definition and examples of what constitutes bullying is outlined in the Genesis Family Handbook.

Anyone who sees an act of bullying, and who then encourages it, is engaging in bullying. This policy applies to all students, staff and volunteers.

16. All staff must follow state specific mandatory reporting requirements. Staff should be trained to be aware of and understand their legal and ethical obligation to recognize and report suspicions of mistreatment and abuse. Staff will:
- Be familiar with the symptoms of child abuse and neglect, including physical, sexual, verbal, and emotional abuse.
 - Know and follow organization policies and procedures that protect students against abuse.
 - Report suspected child abuse or neglect to the appropriate authorities as required by state mandated reporter laws.
 - Follow up to ensure that appropriate action has been taken.
17. Staff and volunteers will report concerns or complaints about other staff, volunteers, adults, or students to their Genesis supervisor.
18. Genesis cooperates fully with the authorities to investigate all cases of alleged abuse. Any staff or volunteer shall cooperate to the fullest extent possible in any external investigation by outside authorities or internal investigation conducted by the organization or persons given investigative authority by the organization. Failure to cooperate fully may be grounds for termination.
19. Staff and volunteers may not have engaged in or been accused or convicted of student abuse, indecency with a student, or injury to a student.

III. Policies

Policies define the bandwidth of acceptable behavior in an organization. Because offenders often violate policies to gain access to students, when staff know and understand policies, they can identify, interrupt, and report policy violations. Simply interrupting a policy violation can prevent a false allegation of abuse or put an offender on notice that no one works in private, the rules apply to everyone, and violations will be detected.

Abuse and Molestation Policy

A. Physical Contact

Genesis’s physical contact policy promotes a positive, nurturing environment while protecting students and staff. Genesis encourages appropriate physical contact with students and prohibits inappropriate displays of physical contact. Any inappropriate physical contact by staff towards students in the organization’s programs will result in disciplinary action, up to and including termination of employment.

The organization’s policies for appropriate and inappropriate physical interactions are:

<i>Appropriate Physical Interactions</i>	<i>Inappropriate Physical Interactions</i>
<ul style="list-style-type: none"> • Side hugs • Shoulder-to-shoulder or “temple” hugs • Pats on the shoulder or back • Handshakes • High-fives and hand slapping • Verbal praise • Pats on the head when culturally appropriate • Touching hands, shoulders, and arms • Arms around shoulders • Holding hands (with young children in escorting situations) 	<ul style="list-style-type: none"> • Full-frontal hugs • Kisses • Showing affection in isolated area • Lap sitting • Wrestling • Piggyback rides • Tickling • Allowing a student to cling to an employee’s or volunteer’s leg • Any type of massage given by or to a student • Any form of affection that is unwanted by the student or the staff or volunteer • Compliments relating to physique or body development • Touching bottom, chest, or genital areas

B. Interaction

Staff and volunteers are prohibited from speaking to students in a way that is, or could be construed by most observers as harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning, or humiliating. Staff and volunteers must not initiate sexually oriented conversations with students. Staff and volunteers are not permitted to discuss their own sexual activities with students.

Abuse and Molestation Policy

Genesis’s policies for appropriate and inappropriate verbal interactions are:

<i>Appropriate Verbal Interactions</i>	<i>Inappropriate Verbal Interactions</i>
<ul style="list-style-type: none"> • Positive reinforcement • Appropriate jokes • Encouragement • Praise 	<ul style="list-style-type: none"> • Name-calling • Discussing sexual encounters or in any way involving students in the personal problems or issues of staff and volunteers • Secrets • Cursing • Off-color or sexual jokes • Shaming • Belittling • Derogatory remarks • Harsh language that may frighten, threaten or humiliate students • Derogatory remarks about the student or his/her family

C. One-on-One Interaction

Most abuse occurs when an adult is alone with a student. Genesis aims to eliminate or reduce these situations and prohibits private one-on-one interactions unless approved in advance by the organization administration.

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

Abuse and Molestation Policy

Additional Guidelines for One-on-One Interactions

- When meeting one-on-one with a student, always do so in a public place where you are in full view of others (unless given prior supervisory approval).
- Avoid physical affection that can be misinterpreted. Limit affection to pats on the shoulder, high-fives, and handshakes.
- If meeting in a room or office, leave the door open or move to an area that can be easily observed by others passing by.
- Inform other staff and volunteers that you are alone with a student and ask them to randomly drop in.
- Document and immediately report any unusual incidents, including disclosures of abuse or maltreatment, behavior problems and how they were handled, injuries, or any interactions that might be misinterpreted.

1. Tutoring/ Private Coaching:

One-on-one situations, such as tutoring and private coaching sessions, introduce additional risks for false allegations. Staff and volunteers should be aware of our policies regarding tutoring and private coaching:

- a. Staff and volunteers must have supervisor approval for any tutoring or private coaching sessions.
- b. Tutoring and coaching sessions with Genesis's students may not occur outside of the organization.
- c. Supervisors must keep a schedule of private tutoring and coaching sessions, which should include times, students involved, and location of sessions.

D. Off-site Contact

Many cases of organizational abuse occur off-site and outside of regularly scheduled activities. This contact outside of regularly scheduled activities may put staff, volunteers, and Genesis at increased risk.

Genesis prohibits interactions outside of regularly scheduled program activities unless approved by the organization's Administration.

Genesis has determined that the following forms of outside contact are appropriate (and more likely to be approved) and inappropriate (not approvable):

Abuse and Molestation Policy

<i>Appropriate Outside Contact</i>	<i>Inappropriate Outside Contact</i>
<ul style="list-style-type: none"> • Taking groups of students on an outing with written parental approval, including a “release of liability waiver.” • Attending sporting activities with groups of students • Attending functions at a student’s home, with parents/guardians present 	<ul style="list-style-type: none"> • Taking one student on an outing without the parents’/guardians’ written permission • Visiting one student in the student’s home, without a parent/guardian present • Entertaining one student in the home of staff or volunteers • A lone student spending the night with staff or volunteers

E. Electronic Communication

Any private electronic communication between staff and students, including the use of social networking websites like - Facebook, Instagram, Snapchat, instant messaging, texting, etc. - is prohibited. All communication between staff and students must be transparent, it must be executed on school-approved platforms, and it must relate to Genesis matters.

The following are examples of appropriate and inappropriate electronic communication.

<i>Appropriate Electronic Communication</i>	<i>Inappropriate Electronic Communication</i>
<ul style="list-style-type: none"> • Sending and replying to emails and text messages from students ONLY when copying in a supervisor or the student’s parent/guardian • Communicating through “organization group pages” on Facebook or other approved public forums • “Private” profiles for staff and volunteers which students cannot access 	<ul style="list-style-type: none"> • Harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning or humiliating comments • Sexually oriented conversations • Private messages between staff and volunteers with students • Posting pictures of organization participants on social media sites • Posting inappropriate comments on pictures • “Friending” participants on social networking sites

Abuse and Molestation Policy

1. Cell Phone Use:

While assigned to work with, teach, or monitor students, staff are not permitted to use electronic communication devices except 1) when required for the lesson being taught, 2) during approved breaks, 3) coordinating logistics during off-campus travel with students, and 4) in emergency situations. Employees need to ensure that friends and family members are aware of this policy.

Use of personal electronic communication devices to contact (via voice, text, or pictures/video) organization members and/or program participants for personal and/or inappropriate reasons shall be grounds for discipline up to and including termination of employment.

2. Acceptable Use of Cell Phones during Program Hours:

There are occasions not listed above in which staff will need to use personal or organization issued electronic communication devices. In these cases, staff will have (or should seek) explicit direction from supervisors governing use.

F. Gift Giving

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

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

IV. Training Requirements

A. General Training Requirements

<i>Audience</i>	<i>Content</i>	<i>Timetable</i>	<i>Delivery Method</i>
All employees and high access volunteers	Child Sexual Abuse Training	Within 30 days of selection	Online Training

Abuse and Molestation Policy

All employees and high access volunteers	Mandated Reporter Training	Within 30 days of selection or prior to placement	Online Training
All employees who make hiring decisions	Screening and Selection	Prior to making hiring decisions	Live and Online Training

V. Monitoring and Supervision

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

A. Facility Monitoring

1. Security Cameras – Cameras are positioned to view every classroom, hallway, and stairwell. Cameras also record activities in the drop-off/pick-up lane and outdoor play areas. Staff is aware of camera placement and recording, which should mitigate risk.
2. Bathrooms – Cameras in the hallways allow supervisory staff to determine who enters the bathroom and at what times in the event of any allegations of improper behavior. Scholars are also expected to be monitored by another scholar (selected by the teacher) or by the teacher or designated staff member.
3. General – Supervisory staff periodically monitor the hallways with walk-through observations or video monitoring to ensure that policies and procedures are being followed. Staff also monitors the hallways during arrival, class transition, and dismissal.

B. Checking Members into a Facility:

1. When anyone (members, guests, residents, construction workers, maintenance, cleaning crews, etc.) enters the facility during operational hours, they must check in with the front desk.
2. Only the main office door is to be used for entry and exit of visitors. Only staff or contractors with entry badges can use other entrances.
3. All entrance/exit doors are to remain closed unless appropriate persons are entering or exiting. Doors should not be propped open unless a staff member is at that door.

Abuse and Molestation Policy

C. Monitoring Student in Facilities

1. Genesis homeroom teachers are required to take attendance each day to verify which students are present in the facility each day. Any students who arrive after attendance is taken, must be logged into the main office by a parent/guardian using the Genesis automated check-in system. Any student who leaves after being logged in as present, must be logged out using the Genesis automated check-out procedure.
2. Genesis requires a parent or legal guardian to complete program registration forms which include identifying information, any special medical or behavioral circumstances, any legal indemnifications, the student's date of birth, and emergency contact information.
3. Genesis require students to sign a Student Commitment Form that outlines Genesis' behavioral expectations and policies contained in the Genesis' Family Handbook, including those regarding appropriate and inappropriate interactions and disciplinary policy. The form also acknowledges that students have reviewed the Handbook with their parent/guardian.
4. Genesis requires parents/guardians to sign a Parent Commitment Form that outlines the expectations that Genesis has of parents regarding their support of the Code of Conduct and the Academy's disciplinary policies and procedures.
5. All new families are expected to attend a parent/guardian orientation. If a new parent cannot attend, or enrolls after the last orientation session, Genesis will hold individual/small-group information sessions to ensure parents are aware of the expectations contained in the Family Handbook, including those related to the Code of Conduct and student discipline.
6. While in the facility, students are always required to be directly supervised by an adult staff member. Bathroom supervision may be direct or indirect (see Section D).
7. All volunteers and visitors are required to wear an identification badge. All Genesis staff are required to direct any adult to the main office who is not a known employee and who is not wearing a name badge. The staff member is also required to immediately contact the main office and report the issue.
8. Genesis teachers are trained during the summer on how to manage all student transitions (arrival, bathroom breaks, locker accessibility, class change, lunch room schedules, dismissal, after-school program transitions, etc.).

D. Monitoring High Risk Activities

1. Bathroom Activities

- a. Adult Supervision – Genesis encourages bathroom breaks be taken at specific times throughout the day (e.g. at P.E./recess, after lunch, etc.) for large groups/whole class. Those breaks are supervised by adults.
 - Adults should supervise any “group” bathroom breaks (3 or more)
 - Adult staff members should scan the bathroom before allowing any student(s) being supervised to enter

Abuse and Molestation Policy

- Staff member should make sure that the number of students entering the bathroom is not greater than the number of stalls available.
 - Staff are required to stand outside the bathroom
- b. Student-Based Supervision (Indirect) – When students need to use the bathroom outside of proscribed times, adult supervision is indirect and supported by student monitors.
- Genesis instructs all students on bathroom expectations, including how to serve as a bathroom monitor.
 - When students are granted permission to use the bathroom during class (and not at a schedule break), they must be accompanied by a bathroom monitor.
 - The monitor carries a bathroom/hall pass
 - The adult supervisor sets a time limit on bathroom use; if the students do not return in time the teacher will stand in the hall and send another student to report back to verify whether any adult assistance is needed.
 - Monitors are expected to report to the teacher any behavior that is not in keeping with expectations.
- c. Single-use bathrooms – Students in kindergarten and first grade have in-class, single-user, Jack-and-Jill bathrooms that are shared with one other classroom.
- Staff are required to check the bathroom before allowing a student to use it
 - Staff employ a time-limit; if students are not done by the time limit, the teacher will check to see if assistance is needed.
 - If assistance is needed, the staff member should inform another adult (either a para-professional or teacher) of what is needed and keep the door slightly ajar.
- d. Staff bathrooms are separate from student bathrooms.

2. Playground Activities

The playground procedures include:

- a. Students to remain in line-of-site of staff at all times.
- b. All staff are assigned specific areas to supervise (“zone monitoring”).
- c. Students follow bathroom procedures as normal.
- d. Staff conducts periodic roll call for group under their charge.
- e. Genesis Administration conducts periodic check-ins and assessments of the activity period and of the entire activity area.

3. Transportation Activities

Charter Bus:

- a. Genesis requires written parent/guardian permission from all students on the trip.
- b. Genesis staff takes a list of cleared students (those with permission) and medical releases with them on the trip.

Abuse and Molestation Policy

- c. The staff takes roll when boarding the bus and then again when boarding the bus (and periodically during the trip when there is a transition from one location to another).
- d. Staff and adult volunteers are seated strategically to permit maximum supervision.
- e. Age groups are seated together; however, high risk students are seated by themselves or with/near a staff member.

Van/Car (not contracted)

- a. If Genesis uses non-contract drivers (individual staff members or parent volunteers), those drivers are prohibited from making unauthorized stops.
- b. When non-contract drivers are used, there must always be two adults present in a vehicle.
- c. When possible, non-contract drivers must allow students to check-in with parents at the beginning and ending of each trip.
- d. Supervisors must verify (when possible) the beginning and ending time, expected mileage (using mapping software) and actual mileage (using odometer readings) of the trip.
- e. Require documentation of any unusual occurrences.

When public transportation is used:

- a. In addition to the transportation procedures listed above, students should remain in one area of the bus, if possible.
- b. Staff and volunteers that are assigned to a group should remain with that group on the bus.
- c. Take a head count or call roll immediately after entering and leaving the bus.

General

- a. Staff must avoid unnecessary physical contact with students while in vehicles.
- b. When possible, staff should avoid engaging in sensitive conversations with students.

4. Off-Site Activities

The off-site procedures include:

- a. Administration must approve all off-site activities.
- b. Parent/guardian approval must be secured.
- c. Bathroom procedures are the same off-site as they are on-site
- d. Transportation policies and procedures apply.
- e. Student-to-Adult ratio is established by administration prior to trip and must always be adhered to
- f. Designated chaperones should always maintain proximal contact with their assigned students; assigned groups must move together
- g. Roll-call should be conducted prior to transitioning to next location.

Abuse and Molestation Policy

5. Overnight Activities

Supervision Guidelines:

- a. All overnight activities must be documented and approved in writing by the Head of Schools.
- b. A “lead” staff member will be selected to supervise the overnight trip. A meeting with all staff and volunteers will be conducted to discuss the unique risks of overnight trips, unique elements of the specific overnight trip and to review the specific policies and procedures.
- c. All parents will be provided with written information about the overnight activity.
- d. All parents/guardians must sign a permission slip for their students to attend the overnight.
- e. The appropriate staff-to-student ratios will be determined to schedule staff and chaperones accordingly.
- f. Meetings with the group should be hosted in open and observable areas; meetings should not be hosted in staff or student rooms.

Overnights at the Facility:

- a. Physical boundaries within the organization will be clearly defined and explained to the students.
- b. Staff will be assigned to a specific group of students to supervise and provided with a list of those students. Head counts and roll checks will be conducted routinely throughout the evening.
- c. Staff will be assigned to monitor high risk areas, such as the bathrooms, entrances and exits, hallways, etc.
- d. When performing room/sleep location checks, staff should always go in pairs.
- e. At least one staff member will always be awake during the overnight stay.

Overnights Away from the Facility:

- a. Overnight stays at private homes are prohibited unless approved by the administration.
- b. In hotel or cabin rooms, students are assigned based on age. Staff should have their own rooms. If staff must share rooms with students, they must have their own beds and never change in front of students.
- c. All staff are to be on duty in the halls or cabins at night until an hour after lights out and all rooms are quiet.

VI. Responding

Once a staff member, volunteer, student, or parent/guardian has expressed a concern or made an allegation about the treatment of a student, Genesis is committed to taking swift and determined action to

Abuse and Molestation Policy

reduce any subsequent risk to the student, to the accused staff member or volunteer, and to the organization.

A. Responding to Suspicious or Inappropriate Behaviors or Policy Violations

Because Genesis is dedicated to maintaining zero tolerance for abuse, it is imperative that every staff member actively participates in the protection of student. If staff observe any suspicious or inappropriate behaviors and/or policy violations on the part of other staff or volunteers, it is their personal responsibility to immediately report their observations.

Remember, at Genesis, the policies apply to everyone.

Examples of Suspicious or Inappropriate Behaviors Between Staff/Volunteers and Student

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

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

1. Staff and Volunteer Response:

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

Abuse and Molestation Policy

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

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

2. Supervisor and Administrator Response:

If a supervisor or an administrator receives a report of suspicious or inappropriate behaviors or policy violations from a staff member or volunteer, the supervisor is instructed to do the following:

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

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

Abuse and Molestation Policy

Based on the information gathered, Genesis may enact the following:

- a. Increase monitoring or supervision of the staff, volunteer, or program.
- b. If more information is needed, conduct additional interviews and/or surveys of other staff, volunteers, or students.
- c. If policy violations with students are confirmed, the staff or volunteer will be subject to disciplinary action up to and including termination and prosecution. Disciplinary action will follow the Progressive Disciplinary Process outlined in this manual.

3. Organizational Response:

Guidelines for Organizational Response

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

B. Responding to Suspected Abuse by an Adult

Staff or Volunteer Response to Abuse:

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

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

- a. Immediate supervisor
- b. Academy Directors
- c. Head of Schools

Abuse and Molestation Policy

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

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

Supervisors and Administrators Response to Abuse:

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

Guidelines for Supervisor and Administrators Responding to Allegations or Incidents of Abuse

- First, determine if the student is still in danger and if so, take immediate steps to prevent any further harm.
- Gather as much information about the allegation as you can. For example, who made the report, who was allegedly abused, who was the alleged abuser, what was the nature of the alleged abuse, where and when did the alleged abuse occur, etc.
- Accurately record everything you learn in as much detail as you can. Remember your notes may be read by others. Stick to the facts.

Abuse and Molestation Policy

- Contact the appropriate local authorities as indicated by your mandatory reporting procedures. Make sure you get a case number and the name and contact information of the person with whom you speak at the reporting agency.
- If the alleged abuse involves a staff member or volunteer, notify your immediate supervisor. If your supervisor is the alleged abuser, notify that person's supervisor (or, in the event the Head of Schools is the alleged abuser and the immediate supervisor, notify Human Resources). crisis management team and follow your crisis management plan.
- Suspend the accused staff or volunteer until the investigation is completed.

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

Student -to- Student sexual activity and sexualized behaviors often remain unreported in organizations because staff and volunteers are sometimes not comfortable documenting these situations or may not know how. Student -to- Student sexual behaviors can include inappropriate touching, exposing body parts, using sexualized language, making threats of sexual activity, engaging in sexual activity, and similar types of interactions.

All staff are required to report such behaviors based on the below.

Student -to- Student Interactions:

Most serious incidents of student -to- student abuse are preceded by more subtle incidents such as name-calling, taunting, or roughhousing. Interrupting these interactions early and establishing and communicating standards of conduct can keep the program environment safe. Genesis recognizes that the following interactions are high risk and should be prohibited:

Prohibited Student -to-Student Interactions

- Hazing
- Bullying
- Derogatory/Humiliating name-calling
- Roughhousing

Abuse and Molestation Policy

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

Staff and Volunteer Response:

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

Guidelines for Staff and Volunteers Responding to Student-to-Student Sexual Activity

- If you observe sexual activity between students, you should immediately separate them.
- Calmly explain that such interactions are not permitted and separate the students.
- Notify your supervisor.
- Complete the necessary paperwork including what you observed and how you responded.
- Follow your supervisor's instructions regarding notifying the authorities and informing the parents/guardians of the student involved.

Supervisors and Administrators Response:

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

Abuse and Molestation Policy

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

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

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

- a. Review the need for additional supervision
- b. Review the need for revised policies or procedures
- c. Review the need for additional training
- d. Recommend a student(s) for suspension or expulsion
- e. Alert others in the organization

Organizational Response:

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

Guidelines for Organizational Response

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

Abuse and Molestation Policy

VII. Crisis Intervention Plan

Prior to Beginning of School Year

- Determine who from Genesis will be on the Crisis Intervention Team.
- Educate all employees and volunteers on what to do if someone alleges current or historical abuse involving a Board member, employee, contractor, or volunteer.
- All employees should provide evidence of having undergone mandated reporter training (if necessary, Genesis will provide access to such training).
- All employees should provide evidence of having undergone state compliant Sex Abuse training (if necessary, Genesis will provide access to such training).
- All employees and volunteers should be trained on how to complete the appropriate critical incident forms for Genesis.
- All employees and volunteers should be educated on the Critical Management Plan and sign off on the Abuse and Molestation Policy.
- All employees and Tier 3 contractors or volunteers should have a background check as per the Genesis Background Check policy.
- Designate a point person to respond to all inquiries from parents, the media, and other stakeholders

Beginning of School Year

- Educate parents on abuse prevention. Offer a workshop during which parents can learn how to protect their children from abuse. This is an educational session that is different from the parent meeting described above.
- Provide an age-appropriate youth education program to all Genesis students on how to protect themselves from abuse and how to express concerns.

Immediate Safety after an Allegation

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

Abuse and Molestation Policy

Initial Communication Plan

- Genesis will prepare a short media statement in advance of getting a media inquiry.
- All oral and written communication will convey compassion and confidence.
- All employees and volunteers will refer media inquiries to the appropriate person.
- As soon as possible, the designated spokesperson will meet in person (not over the phone) with identified victims and their parents/guardians.
 - All parties should be reassured that Genesis is taking the matter seriously.
 - Genesis will ascertain the response the family expects and explain the support Genesis will offer (e.g. counseling, additional academic support, etc.).
- Genesis will be prepared to reach out, in writing, to parents/guardians of all children currently attending Genesis as well as those with past contact with the accused offender. The message may communicate some or all the following:
 - **Empathy:** A statement that such incidents run counter to Genesis' values.
 - **Facts:** A summary of the incident, including information about the arrest, suspension, investigation, etc.
 - **Contact Request.** A directive to parents to contact Genesis or the specified authorities if they suspect their child may have been abused.
 - **The Genesis Response:** A statement of Genesis' full cooperation with the authorities. A description of proactive steps Genesis is taking (e.g. offering resources to parents, hosting a parent meeting, training staff, conducting an independent investigation, changes to policies and/or procedures, etc.)
- Genesis will be prepared to host a parent/guardian meeting to speak directly with concerned families and directly answer any questions before rumors or misinformation is spread. The meeting would include the messages contained in the possible written communication (as above).

Acknowledgment of Abuse Prevention Manual

I have read and agree to comply with my organization's policies regarding sexual abuse prevention.

Signature of Employee or Volunteer

Date