Midtown Cultural Center

Safe Environment

Policies and Procedures

Copyright © 2021 Prelature of the Holy Cross and Opus Dei – Midwest Delegation

The Prelature thanks Praesidium for providing the expert guidance that shaped this Model Third-Party Organization Safe Environment Directors' Appendix. Praesidium has more than two decades of research and experience with more than 4,000 youth and vulnerable adult-serving organizations. https://praesidiuminc.com/

Version Date: January 26, 2022

Contents

KEY CONTACTS – QUICK REFERENCE	
DEFINITIONS	2
1. POLICIES	4
1A. Policy Communication	4
1B. Code of Conduct Agreements	4
1C. Policy Review	4
1D. Recordkeeping	5
1D.1 Records of Program Staff	5
1D.2 Program Records	6
1D.3 Program Monitoring Records	6
1D.4 Concerns and Complaints Records	6
1D.5 Investigations Records	7
2. SCREENING AND SELECTION OF PROGRAM STAFF	7
2A. Screening and Selection Process	7
2A.1 Application	8
2A.2 Face-To-Face Interview	9
2A.3 Reference Checks	9
2A.4 Criminal Background Checks	10
2B. Selection	11
2C. Ongoing Screening	12
3. TRAINING	12
4. MONITORING AND SUPERVISION	13

5. REPORTING CONCERNS	13
5A. Data Compilation and Analysis	13
5B. Incident Reports	15
5C. FEEDBACK FROM PROGRAM STAFF	15
5D. FEEDBACK FROM MINORS	16
SE. FEEDBACK FROM PARENTS	17
6. PARTICIPATION OF MINORS AND PARENTS IN MIDTOWN CULTURAL CENTER'S MAINTENANCE OF A SAFE	
ENVIRONMENT	17
6A. Advising Parents about Protecting their Children from Abuse	18
6B. Advising Parents about the Warning Signs of Abuse	18
6C. Advising Parents about Talking with their Children and Responding	18
7. RESPONDING TO POTENTIAL ABUSE	19
7A. PROGRAM DIRECTOR RESPONSE TO RED-FLAG BEHAVIORS OR POLICY VIOLATIONS	19
7B. CORRECTIVE ACTION RESPONSES TO RED-FLAG BEHAVIORS, POLICY VIOLATIONS, OR INCIDENTS OF ABUSE	22
7C. Program Director's Response to Minor-To-Minor Sexual Activity	23
8. GOVERNANCE	24
8A. Board of Directors	24
8B. ACTIVITY REPORTING	25
8B.1 Current Activity Awareness	25
8B.2 New Program Location Approval	25
SUPPLEMENTAL SECTION A: SUMMARY OF DUTIES AND RESPONSIBILITIES	26
Program Director's Responsibilities	27
Board of Directors' Responsibilities	28
SUPPLEMENTAL SECTION B: SAMPLE FORMS	29

APPLICATION FOR PROGRAM STAFF	30
Application For Junior Counselors	34
CODE OF CONDUCT	36
Interview Form For Program Staff or Junior Counselor	39
REFERENCE CHECK FORM FOR PROGRAM STAFF OR JUNIOR COUNSELOR	42
Tips for Obtaining the Best Reference Information	45
CONSENT TO RELEASE AND SHARE INFORMATION	46
SCREENING AND SELECTION CHECKLIST FOR PROGRAM STAFF	47
SCREENING AND SELECTION CHECKLIST FOR JUNIOR COUNSELORS	50
HIGH RISK INDICATORS CHECKLIST FOR ALL SCREENING AND SELECTION	53
High-Risk Indicators Checklist for Application	53
High-Risk Indicators Checklist for Interview	53
High-Risk Indicators for References	54
General High-Risk Characteristics	54
Incident Report	56
REPORT OF CRIMINAL CONVICTION OR DRUG/ALCOHOL ABUSE	58

Key Contacts – Quick Reference

Activity Director

Joe Wheadon and Albert Castañeda

Executive Director

Jim Palos

Member, Board of Directors

Francisco Ruiz

Definitions

The following terms have a specific meaning in this Handbook.

<u>Minor</u>: Anyone who participates in Midtown Cultural Center's Programs and who is less than 18 years old.

<u>Adult</u>: Anyone involved in Midtown Cultural Center's Programs and who is 18 years old or older.

<u>Adult Participant</u>: An Adult who participates in, but does not staff Midtown Cultural Center's Programs in which minors also participate.

Parent: The mother, father, or legal guardian of a minor. If the minor has two parents, then the term "Parent" refers to both parents together.

<u>Program Director</u>: The highest-ranking officer tasked by Midtown Cultural Center's Board of Directors with operating Midtown Cultural Center's Programs.

<u>Program Staff</u>: Adults who direct or help operate Midtown Cultural Center's Programs. Program Staff includes the Program Director and all other staff and volunteers.

<u>Junior Counselors</u>: Minors who are given responsibilities to help operate Midtown Cultural Center's Programs.

Abuse: Any single act or failure to act (negligence) that causes serious physical or emotional harm to a minor or places the minor in proximate danger of such harm; or any sustained pattern of actions or neglect that causes serious physical or emotional harm to a minor, including actions such as belittling, frightening, insulting, discriminating, name-calling, making a person the butt of jokes, failing to provide adequate food, shelter, medical care, or supervision, etc. "Sexual abuse" includes non-touching and touching

behavior engaged in for the sexual gratification or interest of the perpetrator or victim, including acts of looking or showing, and including any knowing touching or fondling, either directly or through clothing, for the purpose of sexual gratification or arousal of the perpetrator or victim.

1. Policies

1A. Policy Communication

The Program Director will ensure that the policies outlined in Midtown Cultural Center's Safe Environment Policies & Procedures Handbook are communicated verbally and in writing to Program Staff. Program Staff must know and be able to describe accurately these policies. The Handbook will be published on the Safe Environment page of Midtown Cultural Center's website: https://midtownculturalcenter.org.

The Program Director is responsible for enforcing Midtown Cultural Center's Safe Environment Policies and Procedures. The Program Director must teach and guide everyone involved in Midtown Cultural Center's Programs to interact appropriately with each other, always guided by the standards of Christian charity.

1B. Code of Conduct Agreements

The Program Director will ensure that upon selection, and each year afterward, Program Staff (including the Program Director) sign a statement that they have read and agree to abide by the Code of Conduct contained in Section 1B of the Handbook. Agreement renewals can be done in one batch, on a date the Program Director determines.

Agreement renewals can be done electronically or on paper. Blank Code of Conduct forms will be published on Midtown Cultural Center's website:

https://midtownculturalcenter.org.

1C. Policy Review

The Board of Directors will review Midtown Cultural Center's Safe Environment Policies & Procedures Handbook and Midtown Cultural Center's Safe Environment Directors' Appendix at least annually for relevance, utility, and necessity. Any changes will be immediately published and communicated to Program Staff.

1D. Recordkeeping

Because of the very grave nature of sexual abuse, Illinois has eliminated its statute of limitation for allegations of sexual abuse. Thus, the Program Director will ensure that complete and well-organized records are created and filed regarding Program Staff and regarding Midtown Cultural Center's Programs. These records must be kept indefinitely.

1D.1 Records of Program Staff

The Program Director will keep the following records on file for each Program Staff:

- Application
- Interview notes
- Reference check notes
- Background check results and how discovered criminal convictions, if any, were resolved
- Selection decisions: persons involved and high-risk indicators resolved
- Initial and annual Code of Conduct agreements
- Training Records
 - o Initial training of Program Staff, the Program Director, and staff responsible for Screening and Selection.
 - Annual training of Program Staff and the Program Director.
 - Training of all Program Staff when policies change
- Notice of arrest or conviction of a crime, and what actions were taken in response
- Notice of a drug or alcohol problem, and what actions were taken in response

1D.2 Program Records

The Program Director will create and keep the following records for each of Midtown Cultural Center's Programs.

- Documentation of all of Midtown Cultural Center's Programs:
 - o The location of the program
 - The dates the program started and ended
 - The contents of the program
 - Any significant changes to the size or scope of the program
 - o The Program Staff involved with the program
 - o The ages of minors served in the program
 - A list of minors who attended the program at least once
 - o Any required Parent permissions

1D.3 Program Monitoring Records

The Program Director will create and keep the following records on file:

• Documentation of the approval of new program locations.

1D.4 Concerns and Complaints Records

The Program Director will maintain records for reports of concerns and complaints related to Safe Environment, which are filed by Program Staff, a Parent, or a minor, as well as documentation of Midtown Cultural Center's response to the concern or complaint.

1D.5 Investigations Records

Records of any investigations relating to alleged or suspected abuse of minors in connection with Midtown Cultural Center's Programs will be kept on file. This includes all internal inquiries and outside investigations (for example, conducted by police or DCFS).

2. Screening and Selection of Program Staff

Screening and Selection requirements must be completed and documented for all Program Staff and Junior Counselors. All missing information must be supplied, and all red flags must be documented and cleared.

Sample forms for the completion of this process and examples of high-risk indicators are located in Supplemental Section B.

People involved in the process should exercise judgment to adapt the forms to suit their needs while also capturing the essential information indicated in the sample forms.

2A. Screening and Selection Process

Midtown Cultural Center's Screening and Selection process requires documenting completion of the following steps for Program Staff and Junior Counselors:

Program Staff:

- 1. A written application
- 2. A face-to-face interview
- 3. Three reference checks
- 4. Criminal background check
- 5. Agreement to Code of Conduct

Junior Counselors

- 1. A written application
- 2. A face-to-face interview
- 3. One reference check
- 4. Agreement to Code of Conduct

2A.1 Application

Written applications should document the following:

- Applicant's educational history
- Applicant's employment history
- Applicant's volunteer history
- Three references for the applicant
- Questions related to suitability for a position of trust with minors.

Most required information can be conveyed through a standard Resume or Curriculum Vitae. Questions pertaining to suitability for a position of trust with minors can be answered in an application essay, in a cover letter, or on a standardized form. Examples of suitability questions are:

- Why is the individual interested in the role, working with young people?
- What about the individual's previous experience makes the individual suitable for the role?

2A.2 Face-To-Face Interview

Face-to-face (or video) interviews must be documented and should include the following content:

- Standard, behaviorally based questions designed to assess level of abuse risk.
- Review Midtown Cultural Center's Code of Conduct with the applicant and require applicant to sign the Code of Conduct before the applicant is offered a position to work with minors.

A key component of interviews is assessing the applicant's suitability for working with minors. Past behavior is the best predictor of future behavior. The interview should reveal how an applicant might behave in the future, based on specific examples of how the applicant behaved in similar situations in the past. The interviewer should not allow an applicant to rely on generalities.

The sample interview located in Supplemental Section B is designed to assess the applicant's suitability for dealing with minors by assessing the applicant's proficiency with essential skills: Trainability, Policy Adherence, Patience, and Judgment.

2A.3 Reference Checks

A minimum of three reference checks are required for Program Staff, and one reference check for Junior Counselors.

For Program Staff, at least one reference should be personal or family, and at least one reference should be professional. If available, one of the reference checks should be with a former employer. If available, reference checks should be made with employers or volunteer organizations where the applicant has previously worked with minors. Personal references should have known the applicant for at least 1 year.

Reference checks for Program Staff and Junior Counselors should include standard, behaviorally based questions designed to assess level of abuse risk. The sample reference check questionnaire located in Supplemental B is designed to obtain the desired information.

2A.4 Criminal Background Checks

For Program Staff,¹ a criminal background check must be completed before the applicant is offered a position working with minors. The criminal background check must meet or exceed the following criteria.

Praesidium provides background check services to the Prelature, and, in connection with Midtown Cultural Center's contract with the Prelature, the Prelature offers Midtown Cultural Center access to Praesidium's services. The candidate should complete a Consent To Release And Share Information form (available in the Supplemental Section B). Praesidium background checks are done online, are completely paperless and easy to complete; they meet the standards described below.

- 1. Multi-state criminal records search;
- 2. National sex offender registry check;
- 3. Social Security number trace and alias search; and
- 4. Individual county level search in every county the applicant has lived, worked, or attended school during the previous seven years.

¹ It is not possible to conduct a background check on Junior Counselors, because minors' court records are sealed.

A background check revealing a history of committing child abuse or sexual crimes is automatically disqualifying.

A background check revealing a history of other crimes should be investigated on an individualized basis with the applicant based on the following factors:

- The length of time since the conviction;
- The number of convictions that appear on the conviction record;
- The nature and severity of the conviction and its relationship to the safety and security of others, especially minors;
- The facts or circumstances surrounding the conviction;
- The age of the applicant at the time of the conviction;
- Evidence of rehabilitation efforts; and
- The nature of the role sought (for example: specific duties, supervision, surroundings).

Any affirmative decision to select someone with a criminal history as Program Staff or as a Junior Counselor requires documenting the individualized assessment that is done.

2B. Selection

The decision to accept a candidate as a Program Staff or as a Junior Counselor requires the participation of at least two people. Supplemental Section B contains a sample Selection form and checklist for high-risk indicators.

2C. Ongoing Screening

Program Staff criminal background checks must be repeated at least once every two years. If Program Staff are seasonal and there has been a 6-month gap since the last time they were Program Staff, then the criminal background check must be repeated before resuming service.

If any Program Staff provides notice that they have been convicted of a crime, or if a repeated background check reveals a crime, then the Program Director will ensure that an individualized investigation is completed, following the procedures above in Section 2A(4) (Criminal Background Checks).

3. Training

Praesidium provides background check services to the Prelature, and, in connection with Midtown Cultural Center's contract with the Prelature, the Prelature offers Midtown Cultural Center access to Praesidium's services. If not already done for the background check, the candidate should complete a Consent To Release And Share Information form (available in the Supplement to this Director's Appendix). All required training is easily accessible online through Praesidium's Academy website. Praesidium will save data related to this training and will provide certificates of completion that can be saved in Program Staff files.

Regardless of the training deadlines noted in Midtown Cultural Center's Handbook Section 3 ("Training"), Program Staff will be given a 90-day grace period following Midtown Cultural Center's initial Promulgation of these Safe Environment Policies and Procedures within which to complete the required training.

The Program Director will ensure that all Program Staff receive the necessary training outlined in Handbook Section 3. The Program Director will ensure that all Program Staff receive the necessary training whenever there are changes to Midtown Cultural Center's Safe Environment Policies and Procedures.

4. Monitoring and Supervision

The Program Director and Board of Directors are responsible for ensuring that the architecture of Midtown Cultural Center's campus is suitable for Midtown Cultural Center's Programs, and for thinking through how Monitoring and Supervision will be done at the program location with that location's specific facilities. It is likely that architectural concerns will come up most frequently when holding a program in a family home, whether the host family is present or not during the program.

In general, the interiors of rooms, except bedrooms and bathrooms, should be visible from outside the room (either because a door is not present, or because the door has a window allowing visibility). Program Staff should be able to monitor all areas of a program location easily and routinely. If a location contains rooms and areas that would be completely unused, those areas should be locked and inaccessible to minors. Adult living and bedroom spaces should be locked and inaccessible to minors, or otherwise clearly marked as 'No-Entry.'

5. Reporting Concerns

5A. Data Compilation and Analysis

Compiling and reviewing data (for example, in an Excel spreadsheet, or in a CRM) about Safe Environment concerns that various stakeholders report is important to maintaining a healthy environment for everyone. The Program Director and Board of Directors should use data to.

- to identify high-risk activities, individuals, or programs
- to identify additional needs for training or supervision
- to identify and respond to drift from Midtown Cultural Center's policies and procedures
- to inform policy changes
- to improve activities
- to monitor the overall organizational climate for reporting

Types of data Midtown Cultural Center gathers:

- Program
- Program location
- Type of incident
- Specific location of incidents or occurrences
- Individuals involved
- Ages of minors involved

Sources of data that Midtown Cultural Center gathers:

- Verbal or written concerns received, regarding the safety of minors
- Incident reports

- Meetings with Program Staff
- Program Staff's Discussions with minors
- Program Staff's Discussions with parents

5B. Incident Reports

Blank incident reports should be readily available on Midtown Cultural Center's Safe Environment webpage, https://midtownculturalcenter.org.

Program Staff should complete an Incident Report whenever:

- A concern about possible abuse is expressed either verbally or in writing;
- A concern about sexually inappropriate behavior is expressed either verbally or in writing; and
- A concern about the Christian atmosphere of programs is expressed, but only if the concern is grave and is expressed in writing (customarily, Program Staff discuss the Christian environment of activities with great frequency; such discussions do not warrant a writeup).

A sample Incident Report is produced in Supplemental Section B to this Director's Appendix.

5C. Feedback from Program Staff

The Program Director should regularly meet with and listen to feedback from Program Staff and the Board of Directors should be attentive to whether this is being done:

- Do Program Staff understand and follow Midtown Cultural Center's Safe
 Environment policies and procedures, particularly with respect to one-on-one interactions with minors?
- Are Program Staff's Safe Environment concerns taken seriously?
- Are Program Staff well-informed about how to handle, report, and respond to suspicions or allegations of abuse?
- Is there anything about working with minors that Program Staff are concerned about?
- Do Program Staff have any suggestions for making activities better?

5D. Feedback from Minors

Because mentoring is integral to Midtown Cultural Center's programs, Program Staff should have ample opportunity to learn about and respond to the concerns of minors related to Safe Environment. Examples of concerns that Program Staff should be especially sensitive to, and which should be reported to the Program Director and Board of Directors are:

- Do minors feel safe from bullying? Do minors think they can go to Program Staff for help regarding bullying?
- Do any minors feel unsafe? Why?
- Has any Program Staff or Adult Participant made a minor feel uncomfortable?
- Are there circumstances where minors are alone and without supervision during Midtown Cultural Center's Programs?

- Has any Program Staff or Adult Participant communicated with a minor in an inappropriate way (for example, on Social Media)?
- Does the minor have any suggestions for making activities better?

5E. Feedback from Parents

Because partnering with parents is integral to Midtown Cultural Center's Programs, Program Staff should have ample opportunity to learn about and respond to the concerns of a Parent related to Safe Environment. Examples of concerns that Program Staff should be especially sensitive to, and which should be reported to the Program Director and Board of Directors are:

- Is the Parent satisfied with the safety of their child at Midtown Cultural Center's Programs?
- Does the Parent/minor ever say anything about Program Staff or about the program in general that is of concern?
- Is the Parent concerned about the contacts Program Staff have with their child outside of regularly scheduled program hours?
- Does the Parent have any suggestions for making activities better?

6. Participation of Minors and Parents in Midtown Cultural Center's Maintenance of a Safe Environment

Because our programs take place in partnership with parents, it could happen that parents seek advice or information about suspected abuse. If parents seek such advice, the Program Director should be prepared to provide the following basic information to parents. Since the Program Director is not an expert in these areas, if more detailed

information is needed, he or she should direct the parents to seek such information from experts in the field of abuse prevention and response, such as Praesidium.

6A. Advising Parents about Protecting their Children from Abuse Experts in abuse prevention recommend the following to parents:

- Teach their children the proper names for all body parts, including the proper names for private parts. This helps children talk about anything that is bothering them.
- Teach their children to never let other people touch their private parts or to make them touch another person's private parts.
- Teach their children what to do when someone breaks the rules: (1) say no; (2) move away from that person; (3) tell another adult or their Parent.

6B. Advising Parents about the Warning Signs of Abuse

Parents know their children very well. If they notice unusual physical injuries, changes in their children's behavior, or hear unusual comments from children, parents should be alert to abuse being a possible source of the changes.

6C. Advising Parents about Talking with their Children and Responding

Children may be very embarrassed by behaviors that are scary, uncomfortable, or abusive. The way a Parent responds is important to a child's ability to recover. Experts recommend:

- **Listen**: Stay calm and let the child talk; ask calm questions.
- **Reassure**: Tell the child things like:
 - a. "I know this is hard to talk about."
 - b. "Don't worry. You did the right thing by letting me know."

- c. "This isn't your fault. You didn't do anything wrong."
- d. "I'm very sorry this happened to you."
- **Protect**: Make sure the child is safe, tell the child you will do everything you can to keep him or her safe, and don't allow the child to have any further contact with the accused person. Let the child know you have to share the information with others who can help.
- **Report**: Write down what the child shared with you in as much detail as possible, using the child's words and not your own interpretation. Call your local police department or Illinois' abuse reporting hotline, 1-800-252-2873 (1-800-25-ABUSE).

7. Responding to Potential Abuse

7A. Program Director Response to Red-Flag Behaviors or Policy Violations

The Program Director will do the following when in receipt of a report of red-flag (inappropriate) behaviors or policy violations.

- 1. Determine the appropriate response based on the report. Take into consideration factors such as:
 - Context of the red-flag or inappropriate behavior or policy violation;
 - Severity of the red-flag or inappropriate behavior or policy violation;
 - History of red-flag or inappropriate behaviors or policy violations; and
 - Trainability of the Program Staff involved.
- 2. Choose one or more from among the range of appropriate responses that may be taken:

- <u>Small concerns</u>: Allow the reporter to speak with the person involved, indicating the specific behavior, why the behavior does not meet the standard of Christian virtue, and explaining what correct behavior would be. (This could be understood as an instance of the traditional evangelical practice called "fraternal correction.") Examples of minor concerns:
 - Physical roughhousing
 - o An adult behaving in a childish or immature way
 - An adult getting angry at a minor for making a mistake (as opposed to properly correcting the minor)
 - o An adult being alone with a minor one time
- Boundary violations or mistreatment: The Program Director will advise the person
 who reported the behavior that their concern is being taken seriously and then the
 Program Director will speak directly with the person involved, indicating the
 specific behavior, why the behavior falls short of the standards of Christian virtue
 and Midtown Cultural Center's Safe Environment policies, and explaining what
 correct behavior would be.
 - o Examples of boundary violations or mistreatment:
 - Repeatedly tackling, poking, or tickling minors
 - Playing favorites with minors, taunting minors when they make a mistake such as during sports
 - An adult being alone with a minor multiple times

- Talking about sexual matters in an inappropriate way with minors
- Because a boundary violation or mistreatment is involved, the Program
 Director should document the conversation on an Incident Report.
- If a boundary violation or mistreatment is involved, and if the conversation with the Program Director does not produce a change in behavior, the Program Director will issue a written warning.
- O If boundary violations or mistreatment behaviors continue, the Program Director may terminate Program Staff from activities with minors.
- The Program Director should check the file of the Program Staff involved to determine if there have been similar concerns in the past with the same individual.
- Explicit physical, emotional, or sexual abuse:
 - Document the report on the appropriate form.
 - o If appropriate, notify parents.
 - o Contact the state authorities and file a report.
 - o Notify the Board of Directors.
 - Suspend the potential abuser from participating Midtown Cultural Center's
 Programs at least until an investigation is completed.

 If serious policy violations are confirmed, the Program Staff will be subject to disciplinary action up to and including termination from Midtown Cultural Center's Programs and/or prosecution.

7B. Corrective Action Responses to Red-Flag Behaviors, Policy Violations, or Incidents of Abuse

When a serious red-flag (inappropriate) behavior, a serious policy violation, or an incident of abuse has been confirmed, the Board of Directors should conduct an internal review to develop a Corrective Action Plan:

- 1. Define the problem. Identify Who, What, When, and Where.
- 2. Gather all information and data surrounding the problem.
 - a. Review the incident
 - b. Review documentation
 - c. Interview key individuals
 - d. Review policies
 - e. Review training curricula
- 3. Determine root cause(s)
 - a. Ask Why?
 - b. Examine what system-wide causes may have allowed the incident to occur.
- 4. Identify Corrective Action to prevent the problem from recurring

- a. Is there a need for increased supervision?
- b. Is there a need for additional training?
- c. Do any policies and procedures need to be revised?
- d. What policy or policy compliance was found to be deficient?
- e. What best practice standards can be put into place to prevent a recurrence?
- f. What resources are needed to implement the best practice standard?
- g. How will Midtown Cultural Center implement the best practice and ensure compliance?
- 5. Implement the necessary solution(s).
- 7C. Program Director's Response to Minor-To-Minor Sexual Activity When the Program Director receives a report of a minor's sexualized behavior or minor-to-minor sexual activity, they should:
 - Meet with the Program Staff who reported the sexual activity to gather additional information
 - Confirm that the minors involved have been separated or placed under increased supervision
 - Notify State authorities, if required by the circumstances and by law
 - Review the Incident Report to ensure it is accurately and thoroughly completed
 - Meet with parents of the minors involved

- Review the immediate steps taken by the Program Staff who initially responded
- Determine what additional actions should be taken to ensure there is not a
 recurrence, including dismissing the perpetrator from this or all of Midtown
 Cultural Center's Programs (in some cases, minors' behavior can be managed
 through a supervision plan)
- Develop a written corrective action or follow-up plan in response to the incident Based on the information gathered, the Program Director may need to do the following:
 - Assess whether the activities are suitable for the minors involved
 - Review the need for additional supervision of minors
 - Review the need for revised policies or procedures
 - Review the need for additional Program Staff training
 - Review the need for additional education of minors
 - Alert other Program Staff

8. Governance

8A. Board of Directors

The Board of Directors reviews issues related to:

- Potential liability exposures
- Pending incident investigations

- Pending litigation, if any
- Potential media involvement
- Liability insurance coverage

8B. Activity Reporting

8B.1 Current Activity Awareness

The Board of Directors stays aware of all of Midtown Cultural Center's Programs, including when they began and when they cease and any substantial modifications to the Programs in the interim.

8B.2 New Program Location Approval

If a Program will take place at a new location, the Board of Directors reviews the architecture of the location, proposed lodging arrangements, proposed bathroom arrangements, and proposed monitoring and supervision arrangements.

Supplemental Section A: Summary Of Duties and Responsibilities

Program Director's Responsibilities

- Policy Communication and Enforcement (Director's Appendix, Section 1A):
- With the Board of Directors, ensure the architecture of a proposed activity location is suitable for programs (Director's Appendix, Sections 4, 8B.2)
- Ensure all required records and data are compiled and filed:
 - o Records of Program Staff (Directors' Appendix, Sections 1D.1)
 - Records of Midtown Cultural Center's Programs (Directors' Appendix, Section 1D.2)
 - All records from the Screening and Selection Process (Directors' Appendix, Sections 1B, 2)
 - o All training records for Program Staff (Directors' Appendix, Section 3)
 - o Incident Reports (Directors' Appendix, Sections 5B, 7A, 7C)
 - Feedback from Program Staff, minors, and parents (Directors' Appendix, Sections 5C, 5D, 5E)
 - Responses to Red-Flag Behaviors or Policy Violations (Directors' Appendix, Section 7A, 7C)

Board of Directors' Responsibilities

- Select the Program Director, following all Screening and Selection requirements outlined herein (Director's Appendix, Sections 1B & 2).
- Ensure the Program Director is fulfilling all responsibilities outlined herein
- Policy Review (Director's Appendix, Section 1C)
- Ensure, with the Program Director, that the architecture of a program's location is appropriate for programs (Director's Appendix, Section 4, 8B.2)
- Conduct an internal review whenever serious inappropriate behavior, a serious policy violation, or an incident of abuse is confirmed (Directors' Appendix, Section 7B)

Supplemental Section B: Sample Forms

Application For Program Staff Date of Birth: Street Address: State: _____ Zip:_____ Email Address: Phone: _____ Is this a cell phone? Yes / No Position Applied For: List Addresses and dates you lived there for the past 7 years: Why are you interested in the role, working with young people? What experiences have you had that make you a suitable candidate for this role?

What experiences have you had working specifically with young people?

<u>Educational History</u>: Provide the requested information for your 3 most recent educational degrees:

School Name, City, State:
Type of Degree or Certificate (include major if relevant):
School Name, City, State:
Type of Degree or Certificate (include major if relevant):
School Name, City, State:
Type of Degree or Certificate (include major if relevant):
Employment History: Provide the requested information for your 3 most recent employment positions:
Company Name:
Company Mailing Address:
Position Held:
Immediate Supervisor Name and Phone Number:
Dates of employment (mm/yyyy to mm/yyyy):
Reason for leaving position:
Company Name:
Company Mailing Address:
Position Held:
Immediate Supervisor Name and Phone Number:
Dates of employment (mm/yyyy to mm/yyyy):
Reason for leaving position:
Company Name:
Company Mailing Address:
Position Held:
Immediate Supervisor Name and Phone Number:
Dates of employment (mm/yyyy to mm/yyyy):
Reason for leaving position:

<u>Volunteer Experience</u>: Provide the requested information for your 3 most recent volunteer experiences:

Organization:
Duties:
Beginning and end dates (mm/yyyy to mm/yyyy):
Contact Person and Phone Number:
Organization:
Duties:
Beginning and end dates (mm/yyyy to mm/yyyy):
Contact Person and Phone Number:
Organization:
Duties:
Beginning and end dates (mm/yyyy to mm/yyyy):
Contact Person and Phone Number:
<u>References</u> : We require three references. At least one reference should be personal or family, and at
least one reference should be professional. Provide the requested information for each reference.
least one reference should be professional. Provide the requested information for each reference.
least one reference should be professional. Provide the requested information for each reference. Reference Contact Name:
least one reference should be professional. Provide the requested information for each reference. Reference Contact Name: Reference Contact Organization and Position:
Reference Contact Name: Reference Contact Organization and Position: Reference Type (personal, family, professional):
Reference Contact Name: Reference Contact Organization and Position: Reference Type (personal, family, professional): Organization Address:
Reference Contact Name: Reference Contact Organization and Position: Reference Type (personal, family, professional): Organization Address: Best Phone Number For Reference:
least one reference should be professional. Provide the requested information for each reference. Reference Contact Name: Reference Contact Organization and Position: Reference Type (personal, family, professional): Organization Address: Best Phone Number For Reference: Best Email Address For Reference:
least one reference should be professional. Provide the requested information for each reference. Reference Contact Name: Reference Contact Organization and Position: Reference Type (personal, family, professional): Organization Address: Best Phone Number For Reference: Best Email Address For Reference: Reference Contact Name:
Reference Contact Name: Reference Contact Organization and Position: Reference Type (personal, family, professional): Organization Address: Best Phone Number For Reference: Best Email Address For Reference: Reference Contact Name: Reference Contact Organization and Position:
Reference Contact Name: Reference Contact Organization and Position: Reference Type (personal, family, professional): Organization Address: Best Phone Number For Reference: Best Email Address For Reference: Reference Contact Name: Reference Contact Name: Reference Contact Organization and Position: Reference Contact Organization and Position: Reference Type (personal, family, professional):

Reference Contact Name:
Reference Contact Organization and Position:
Reference Type (personal, family, professional):
Organization Address:
Best Phone Number For Reference:
Best Email Address For Reference:

All statements contained in this aptrue to the best of my knowledge.	•	I have reviewed this application for completeness.	or
Applicant Signature	Date	Screening Manager	Date

Application For Junior	Counselors	
Name:	Date of Birth:	
Street Address:		
City:	State:	Zip:
Email Address:		
Phone:	Is this a cell phone? Yes / No	
Position Applied For:		
Why are you interested in the role	e, working with young people?	
What experiences have you had t	that make you a suitable candidate for	this role?
What experiences have you had v	working specifically with young people	e?
Educational History : Provide th	ne requested information for your High	School:
High School Name, City, State:		
Employment History: If you har recent job:	ve already worked a job, please provid	e information about your most
Company Name:		
Company Mailing Address:		
Position Held:		
Immediate Supervisor Name and	d Phone Number:	
Dates of employment (mm/yyyy	y to mm/yyyy):	

your most recent volunteer ex	sperience:		
Organization:			
Duties:			
Beginning and end dates (m	m/yyyy to mm/yyyy)	:	
Contact Person and Phone N	lumber:		
References: Please provide the a teacher, a supervisor, or		e reference we can contact ab	oout you. A reference can
Reference Contact Name:			
Reference Contact Organiza	tion and Position:		
Reference Type (personal, fa	amily, professional):		
Organization Address:			
Best Phone Number For Ref	erence:		
Best Email Address For Ref	erence:		
All statements contained in true to the best of my knowl	* *	I have reviewed this applie	cation for completeness.
Applicant Signature	Date	Screening Manager	Date

<u>Volunteer Experience</u>: If you have volunteered somewhere before, please provide information about

Code of Conduct Midtown Cultural Center

Every human being is endowed with dignity. Midtown Cultural Center believes that every human being is a child of God and that Christian charity should guide all interactions between all individuals in Midtown Cultural Center's Programs. Each person's dignity demands refined speech, refined behavior, and refined respect from other persons.

Midtown Cultural Center has zero tolerance for any abuse of minors who participate in Midtown Cultural Center's Programs, perpetrated by any adult or minor in connection with Midtown Cultural Center's Programs.

This Code of Conduct applies to all Program Staff, Junior Counselors, and Adult Participants in their interactions with Minors enrolled in Midtown Cultural Center's Programs, whether interactions occur during or outside of scheduled programming.

For clarification about any guideline or about anything not specifically addressed here, speak with the Program Director.

- 1. Midtown Cultural Center does not tolerate any abuse of minors in connection with Midtown Cultural Center's Programs, whether perpetrated by another minor or an adult. Abuse of a minor will result in disciplinary action, possibly including dismissal or termination from Midtown Cultural Center's Programs and Midtown Cultural Center's cooperation with law enforcement.
- 2. Whenever an individual adult is with an individual minor, they should always remain in view of other people and avoid being alone in any isolated place. When meeting in a room, they should meet with the door open or with a window in the door allowing them to be easily seen.
- 3. Priests should hear confessions and give spiritual direction to minors only in a confessional with a screen, in a room with a window in the door allowing them to be easily seen, or in a place where they are in the sight of other people (but out of earshot). Priests should hear the confessions of and give spiritual direction to females only in a confessional with a screen.
- 4. Priests will not provide spiritual direction to minors through electronic means. Spiritual direction may only be provided in person.
- 5. No adult should ever be alone with a minor in a bedroom. No minors should ever be in an adult's bedroom, and it is better if they do not enter the adult residents' area of a building.
- 6. In overnight programs, the Priest should have his own bedroom.
- 7. Any overnight programs or one-day trips should include a sufficient ratio of Program Staff to minors, and never fewer than two Program Staff.

- 8. In overnight programs, no adult should share a bedroom (or tent) with minors. Minors should sleep either in single rooms or in rooms with three or more.
- 9. Adults and minors should have separate bathrooms, showers, and/or changing areas, or use the bathroom, showers, and/or changing areas at separate times. No adult should use the bathroom, shower, or dress in the presence of minors and vice-versa. Whenever minors need to dress with other minors present, they should be instructed to use bathrobes or at least towels. All showers should be individual showers or have individual stalls. There should never be two minors alone together in a bathroom, changing area, or showering area, unless adults are supervising. Whenever supervision is necessary, at least two adults should stand outside the bathroom entrance, shower room, or changing area, and at least two adults should enter the bathroom, shower room, or changing area together.
- 10. An adult should never be alone in a vehicle with a minor. If adults need to drive minors, there should be a minimum of three people in the car (two adults and one minor, or one adult and two minors). The only exception may be an emergency, such as driving a minor injured during a program to the Emergency Room or Urgent Care.
- 11.Before a minor attends an overnight program, Program Staff must obtain written approval from the minor's Parent.
- 12. Adults and minors must never taunt, intimidate, belittle, bully or otherwise verbally abuse other minors.
- 13. Adults must avoid any physical contact that is sexual or could be misconstrued as sexual. In this area, it is better to err on the side of caution. Wrestling and rough-housing should be avoided.
- 14. Adults must never invite or aid minors to smoke, drink alcohol, or use illegal drugs. The possession and use of marijuana are always prohibited, regardless of its legality.
- 15. Program Staff may exchange program-related text messages with minors who are high school students (and not with younger students), if they first obtain general approval from the minor's Parent.
- 16. Program Staff may speak by phone or audio chat with a minor, but only after obtaining general approval from the minor's Parent. Program Staff may interact with minors through video calls only within view of other Program Staff or if the minor is within view of his or her Parent. Prior to the minor completing 7th grade, for each audio or video interaction, Program Staff must first speak with the minor's Parent before asking to speak with the minor.
- 17. Program Staff and a minor may meet with each other outside of regularly scheduled program hours, but only after obtaining general approval from the minor's Parent and only if all other policies are followed.
- 18. Adults are prohibited from giving individualized gifts to minors, unless a minor's Parent has approved a particular gift for their child.

- 19. Adults must never give or show to a minor pornographic or indecent media or materials. In speaking about matters related to the virtue of chastity, it is best to emphasize the positive aspects of the ascetical struggle.
- 20. The access, display, production, possession, or distribution of pornography through any Midtown Cultural Center's property or equipment, or in association with any of Midtown Cultural Center's Programs, is strictly prohibited.
- 21. Anyone who knows or reasonably suspects that a minor has been abused in connection with any of Midtown Cultural Center's Programs must immediately inform the Program Director. In many States, the law requires adults who work with minors to report to State authorities known or reasonably suspected child abuse or neglect. All Program Staff will undergo training on abuse reporting requirements in their State.
- 22. Midtown Cultural Center takes every suspicion or allegation of abuse seriously and will cooperate with civil authorities to investigate suspected or alleged abuse. Program Staff are required to cooperate with any outside or internal investigation of suspected or alleged abuse of minors. Failure to cooperate may be grounds for termination from Midtown Cultural Center's Programs.

23. If a minor says that he/she has been abused, Program Staff should listen calmly without disputing the

story, ask for pertinent details (who, when, what), a Director. The minor should be encouraged to tell h	and tell him/her that he/she will speak to the Program
Č	
I,	_, have read the above guidelines and agree to abide
by them in connection with all of <mark>Midtown Cultura</mark>	al Center's Programs involving minors. I understand
that I will be asked to review and sign my agreeme	nt with Midtown Cultural Center's guidelines
annually.	

Date

Signature

Interview Form For Program Staff or Junior Counselor Applicant Name: _____ Date of Interview: ____ Interviewer Name: _____ The purpose of this interview is to: 1) Use behaviorally based questions to assess a candidate's suitability for a position, and 2) Ensure the candidate understands and agrees to Midtown Cultural Center's Code of Conduct Questions 1-11 should be explored in a natural way and not rigidly, as is appropriate to a specific candidate and situation. Question 12 is essential and should be followed exactly, when interviewing adults for Program Staff. Question 13 is essential and should be followed exactly, when interviewing minors for Junior Counselor 1. Tell me why you are interested in this position. 2. What group of minors would you prefer to work with? Why? 3. Tell me about some of your hobbies or volunteer work. 4. Tell me about a time in your life when you had to quickly learn how to do something. What did you have to learn? How did you learn it? Did you use the new information? 5. Often in school or work, we're expected to adhere to policies that don't really make sense to us. Tell me about a time when you had to stick to a rule, even though it didn't seem reasonable. How did you handle that situation?

6. Tell me about a time when a child (or teen) really tried your patience. Tell me specifically what happened. How did you respond to that situation?
7. Describe the two most frustrating situations you have encountered when interacting with supervisors and/or coworkers. What happened and how did you handle it?
8. Have you ever been accused of inappropriate conduct with a minor or coworker?
9. Tell me about a time when you were able to make a difference in a minor's life. What did you do, and how did it influence the minor? Where is the minor now?
10. Tell me about a time when someone commended you for your good judgment and common sense. What was the situation and how did you handle it?
11. Tell me about a time when someone you worked with broke the rules or did something that made you or someone else feel uncomfortable. How did you respond?
12. Did the candidate read Midtown Cultural Center's Code of Conduct? How did the candidate react to Midtown Cultural Center's Code of Conduct? Did the candidate have any questions about it?

13. Did the candidate read the program's rules of conduct for Junior Counselors? How did the candidate react to the program's rules of conduct for Junior Counselors? Did the candidate have any questions about them?

Reference Check Form For Program Staff or Junior Counselor Name of Applicant: ______ Date of Reference Check: _____ Name of Reference: Reference's Organization: Street Address: City: _____ State: ____ Zip:____ Reference's Email Address: Reference's Phone: ______ Is this a cell phone? Yes / No Interviewer Name: Hello, my name is [your first and last name] with [insert your organization's name]. [Applicant's name] has applied for a position with us and said you might be able to tell us about their previous work with minors. Is this a good time for you to talk with me? I would like to start by letting you know that the applicant has applied for a position working with minors, so it is extremely important for us to make sure that every applicant is suitable for this type of position. I appreciate your help with this. <u>Information required from every reference:</u> How long have you known the applicant? 1. How do you know the applicant? 2. Questions to be asked in different ways from different references, according to the interviewer's judgment of what is most appropriate: 3. Essential Skill, Trainability: How would you rate the applicant's ability to learn new information and skills? ____ Above satisfactory ____ Satisfactory ____ Below satisfactory 3a. Can you give me an example of when the applicant was able to learn something new and use it in his/her work?

4. <u>Essential Skill, Policy Adherence</u> : We are looking for someone who will adhere to the best practices of our organization. How would you rate the applicant's ability to follow policies and procedures?
Above satisfactory Satisfactory Below satisfactory
5. How would you rate the applicant's ability to work with and relate to other adults?
Above satisfactory Satisfactory Below satisfactory
6. <u>Essential Skill, Judgment</u> : How would you rate the applicant's ability to use good judgment in stressful conditions?
Above satisfactory Satisfactory Below satisfactory
6a. Can you give me an example of when the applicant used good judgment?
7. Have you observed the applicant interacting with minors? YesNo
7a If yes, how would you rate the applicant's ability to relate to minors?
Above satisfactory Satisfactory Below satisfactory
7b. Describe the applicant's interactions with minors
7c. What roles or types of work has the applicant engaged in with minors? Have they maintained appropriate boundaries with or adequately supervised minors?

	7d. <u>Essential Skill, Patience</u> : Have you observed the applicant not working well with consumers (becoming frustrated, angry, resentful, etc.)? If so, please give an example.
(bends	7e. How would you rate the applicant's ability to maintain appropriate boundaries with minors the rules for minors, violates policies, acts more like a peer than a professional, engages with on social media/text)?
	Above satisfactory Satisfactory Below satisfactory
8. serve?	Are you aware of any reason why we should not allow the applicant to work with the minors we
9.	Do you have any additional comments or questions?
Thank	you very much for your time.
Signatu	are of Screening Manager Date

Tips for Obtaining the Best Reference Information

- 1. Review the list of references with the applicant. Make sure the applicant knows that they must inform each reference that you will be calling. Find out how the applicant knows each reference.
- 2. Inform the applicant that they are responsible for making sure that the references are willing to talk with you and provide a reference.
- 3. Give the applicant a deadline for contacting the reference.
- 4. Make sure the list contains accurate phone numbers and/or email addresses.
- 5. Use a standard reference form for each call but be sure to modify questions so that you can learn about the specific experiences the reference has had with the applicant.
- 6. Be friendly and always treat the references with respect. They will feel more comfortable in the hands of a professional. Require applicants to give the reference's preferred name and use that name when addressing the reference.
- 7. Take notes during the call. Listen for pauses or hesitation and then politely ask "I noticed you hesitated; may I ask why?" Write short quotes from the reference to prompt your memory.
- 8. Review and elaborate upon your notes immediately after the call.
- 9. Note any areas of concern or questions to be clarified with other references or the applicant.
- 10. Require the applicant to follow up with nonresponsive references or provide alternative references.
- 11. Review the Interpretive Guide for references and the High-Risk Indicators for References. Use the skills questions to complete the Essential Skills Rating Sheet. References should be considered in the final decision-making for selection.

Consent to Release And Share Information

I,	, hereby authorize
(Printed name)	
	("the Program")
(name of Program)	
to share my biographical information	with the Prelature of the Holy Cross and Opus Dei
– United States Region ("the Prelatur	re"), for the sole purpose of providing the Program
and me access to services offered by	Praesidium, specifically, Criminal Background
Check services and Training services	5.
I understand and agree that my inform	nation will otherwise be kept confidential and will
not be used for any purpose beyond t	hose described above. I understand that the Prelature
does not assume any responsibility for	or my services as Program Personnel in the Program,
nor does the Prelature assume any res	sponsibility for the services offered by Praesidium. I
understand that the Prelature is simpl	y and only offering the Program and me access to
services provided by Praesidium.	
(Signature)	(Date)

Screening and Selection Checklist For Program Staff

Name of Applicant:	Date of Selection Review
Position For Which Applicant Is Bein	ng Screened And Selected:
Two persons authorized to screen and	d select Program Staff must sign off on a selection decision.
Name of Selection Manager 1:	
Name of Selection Manager 2:	
<u>APPLICATION</u>	
☐ Written Application Submitte	d
☐ Application reviewed for 100°	% completion
☐ Application reviewed for high	risk indicators
Application Items For Follow Up a	and Description of Resolution of Problems:
INTERVIEW	
☐ Applicant Interviewed	
☐ Interview form completed	
☐ Interview reviewed for high ri	isk indicators

Interview Items For Follow Up and Description of Resolution of Problems:
CODE OF CONDUCT
☐ Code of Conduct gone over with applicant
☐ Applicant signed Code of Conduct
☐ Applicant's reaction to Code of Conduct evaluated for high risk indicators
Code of Conduct Items For Follow Up and Description of Resolution of Problems:
Reference Checks
☐ Three references contacted
☐ Reference forms completed for each reference
☐ Reference information reviewed for high risk indicators
Reference Check Items For Follow Up and Description of Resolution of Problems:

	Praesidium online background check request for information sent to applicant		
	Background check completed (applicant completed online authorization, Praesidium returned results)		
	Background check reviewed for criminal history		
Back	Background Check Items For Follow Up and Description of Resolution of Problems:		
Selecti	ion·		
	All Program Staff screening processes fully completed		
	Any high risk indicators have been evaluated and resolved		
	Applicant informed of favorable / unfavorable decision		
	All Screening and Selection Paperwork filed		
Signat	ure of Selection Manager 1:	Date:	
Signat	Signature of Selection Manager 2: Date:		

Screening and Selection Checklist For Junior Counselors

Name of Applicant:	Date of Selection Review:
Position For Which Applicant Is Being Screene	d And Selected:
At least two persons authorized to screen and se	elect Program Staff must sign off on a selection decision.
Name of Selection Manager 1:	
Name of Selection Manager 2:	
APPLICATION	
☐ Written Application Submitted	
☐ Application reviewed for 100% complet	tion
☐ Application reviewed for high risk indic	eators
Application Items For Follow Up and Descr	ription of Resolution of Problems:
INTERVIEW	
☐ Applicant Interviewed	
☐ Interview form completed	
☐ Interview reviewed for high risk indicate	ors

Interview Items For Follow Up and Description of Resolution of Problems:
Code of Conduct
☐ Code of Conduct gone over with applicant
☐ Applicant signed Code of Conduct
☐ Applicant's reaction to Code of Conduct evaluated for high risk indicators
Code of Conduct Items For Follow Up and Description of Resolution of Problems:
Reference Checks
☐ One reference contacted
☐ Reference form completed for reference
☐ Reference information reviewed for high risk indicators
Reference Check Items For Follow Up and Description of Resolution of Problems:

Selection:			
☐ All Junior Counselor screening processes fully completed			
☐ Any high risk indicators have been evaluated and resolved			
☐ Applicant informed of favorable / unfavorable decision			
☐ All Screening and Selection Paperwork filed			
Signature of Selection Manager 1:	Date:		
Signature of Selection Manager 2:	Date:		

High Risk Indicators Checklist for All Screening and Selection

High-Risk Indicators Checklist for Application

	Application has unexplained gaps in dates for education, employment, or place of residence.
	Application includes conflicting or incorrect information.
	Application has omitted or incomplete information.
	The applicant has an unstable work history.
	The applicant provides vague reasons for leaving previous jobs.
	The applicant does not list former supervisors as references.
	The application shows an unusual pattern of work and volunteer positions with a specific type of minor.
	The applicant's work pattern shows themes of problems with authority.
	The applicant found out about the position through dropping in on the program.
	The applicant describes minors as helpless, vulnerable or perfect.
High-	-Risk Indicators Checklist for Interview
	Applicant gave higher risk responses from the Interpretive Guide.
	Applicant gave defensive/angry responses.
	Applicant gave evasive responses.
	Applicant described unusual patterns or themes of gaining access to minors.
	Applicant described preferences for particular characteristics in minors, with no reasonable explanation.

	Applicant described patterns or themes of problems with authority.
	Applicant is not applying for a specific position and is willing to accept any position, whatever the pay and/or responsibilities.
	Applicant reacted strangely or badly to the contents of the Program Staff Code of Conduct.
High	-Risk Indicators for References
	Reference was reluctant.
	Reference did not know the applicant well.
	Reference had a short-term relationship with the applicant a long time ago.
	Reference has not seen the applicant in more than a year
	Reference refused to answer particular questions.
	Reference's information differed from the applicant's account.
	Reference provided evasive responses.
	Reference reported specific concerns about the applicant.
	Reference described applicant as having high-risk characteristics (see below).
Gen	eral High-Risk Characteristics
	The applicant has difficulty relating to or working with people of the opposite sex.
	The applicant has trouble accepting authority, such as only working well in unsupervised situations.
	The applicant has low impulse control.
	The applicant has difficulty asking for help.

The applicant has need for power and control.
The applicant has emotional and social immaturity when relating to other adults.
The applicant has better relationships with minors than adults.
The applicant makes immature decisions.
The applicant does not consider consequences before making decisions.
The applicant uses poor judgment in stressful or difficult situations.
The reference describes the applicant as hot tempered, high strung or "stressed out."
The applicant lets minors get away with too much.
The applicant acts more like a child than an adult.
The applicant lets minors walk all over him or her.
The applicant does not closely supervise minors in the applicant's care.
The applicant relates to minors on their level, just like another minor.
The applicant can become physically or emotionally abusive in some situations.
The applicant is easily agitated by minors.
The applicant openly demonstrates anger when frustrated.
The applicant can be punitive or shaming toward minors.
The reference describes paid or volunteer work, which the applicant has not previously disclosed.
The applicant is excessively interested and involved with minors.
The applicant's hobbies and recreational activities solely involve minors.

Incident Report Date/Time of Incident: _____ Location of Incident / Program: _____ **Type of Incident:** _____ General policy violation _____ Adult-to-minor boundary violation _____ Verbal assault _____ Adult-to-minor sexual abuse _____ Minor-to-minor sexual activity _____ Physical assault _____ Bullying/Hazing _____ Other: _____ Name/Role of Program Staff Involved: Name/Role of Witnesses: **Describe the Incident: Describe the Response of Program Staff:**

Date of No	otification (if applicat	ble):		
	Parents			
	Program Director			
	Law enforcement - o	case #		
	Child protective serv	vices - case #		
Submitted	d by (Name/Role):			_
Signature	::		Date:	
PROGRA	M STAFF OR DIRE	CTOR TO COMPLETE W	HAT FOLLOWS:	
enforceme incident, in revise mor	ent or child protective senterview additional Pro	ive Action (for example, followervices, notify the Board of Dogram Staff, disciplinary action of program involved, review	irectors, review with person for the person involved,	on reporting the increase or
Submitted	d by (Print Name/Role)):		
Signature	:]	Date:	

Report of Criminal Conviction or Drug/Alcohol Abuse Date of Report: Name of Program Staff: _____ Name of Person Making Report: **Type of Report:** _____ Criminal Conviction _____ Drug Abuse _____ Alcohol Abuse Name/Role of Witnesses: **Describe the Problem: Describe the Response of the Board of Directors:** Signature of Program Director: ______ Date: _____