



Peer-to-Peer Sexual Abuse – Risk Management Checklist

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The Risk is Real

All ministries must grasp the reality that Peer-to-Peer Sexual Abuse is a real and growing risk. This challenge is not addressed by training alone, but requires action and planning from ministry leaders, including:

- (1) developing prevention strategies tailored to ministry programming and facilities;
- (2) developing a response plan, including reporting and communication to parents/guardians; and
- (3) training all staff members and volunteers to better understand the risk, as well as each individual's respective role in preventative strategies *and* the ministry's communication plan.

Philosophy of Services

All ministries should embrace an underlying philosophy that *participation is a privilege ... not a right*. A child's enrichment from involvement in a ministry program is jeopardized if the child is harmed. *Child safety is primary; programming is secondary*. If a program participant exhibits aggressive behaviors, whether sexually, verbally or physically, he or she threatens the safe environment for others. If the aggressive child cannot be redirected, the aggressive child may lose the *privilege of participation*. Each ministry must be prepared to remove a child who poses a risk to a safe and healthy environment for *other children*.

Train Staff Members

Peer Sexual Abuse presents a unique risk. ALL ministry staff members should complete Peer Sexual Abuse Training, which defines Peer Sexual Abuse, describes common imbalances of power, provides examples of risk, outlines methods to reduce risk, and addresses reporting processes (internally and to authorities). Staffing ratios are largely meaningless if staff members are not trained to recognize and respond to this *known* risk.

Action Steps:

- Identify and deploy an effective Peer-to-Peer Sexual Abuse Training.
Preview: MinistrySafe.com/PeerSexualAbuse
- Employ a record-keeping system to demonstrate ongoing training efforts.

Evaluate Facilities

Peer Sexual Abuse risk may be significantly mitigated by a facilities review with an eye for areas and activities of greater risk.

The sexually aggressive child tends to be opportunistic, identifying less-easily-seen locations where inappropriate behavior may go unobserved. After completion of Peer Sexual Abuse Training, Ministry leaders and staff members should evaluate facilities to identify locations or activities where a sexually aggressive child might seek to avoid direct supervision. This facility evaluation should occur *before children are gathered for programming*, and a plan formulated to remove or supervise all locations or activities identified as higher risk.

A primary goal of supervision is to ensure that interaction between children is observable. When evaluating buildings, rooms and activity space, *Line of Sight* is a key consideration. Consider using a facility map or layout of various rooms and spaces intended for programming or activity, and create identifiable *zones of supervision*, then staff accordingly.

Action Steps:

- Obtain (or create) a layout or map of *all* spaces accessible to children – (Ex: dining halls, cabins, activities, outdoor areas, bathrooms, etc).
- Walk through each space to evaluate ease of visibility and blind spots.
- Remove all possible line-of-sight obstructions.
- Develop geographically-identified *zones of supervision*.
- Identify areas of higher risk – Paying close attention to bathrooms, locker rooms, sleeping/changing areas and play structures.
- Create staffing minimums and ratios for each zone to accommodate programming AND supervision.
- Train staff members concerning best locations for visibility and supervision in each zone.
- Periodically re-evaluate.

Evaluate Programs/Activities

Similar to a facilities evaluation, all programming and planned activities should undergo an intentional evaluation for Peer Sexual Abuse risk. A sexually aggressive child will look for opportunities during programming to engage in inappropriate touch or create unobserved one-to-one interaction. Be prepared to modify activities or programming to address findings from this evaluation.

Action Steps:

- Evaluate all program locations, seating, games, and activities for visibility and possible opportunity for inappropriate touch.
- Pay close attention to nighttime and water activities.

Adequate Staffing Ratios

Each Ministry must be adequately staffed. Given the known risk of Child Sexual Abuse, whether at the hands of an adult *or* another child, it's inadequate to simply staff for specific activities or programming. Instead, the Ministry must have sufficient staffing to ensure that all behavior between children is observable. Particular attention should be given to bathrooms, locker rooms or changing areas, water activities, nighttime activities and 'free time'. A Ministry's staffing plan must accommodate one or more children leaving a group activity, whether for medical purposes or to use the bathroom, ensuring that staff members are not alone with a child and staffing ratios are maintained.

Action Steps:

- Ensure sufficient staffing in accord with the facility and program/activity evaluation.
- Create a supervision and staff communication plan for a child needing to leave the group.
- Create a supervision and staff communication plan if an emergent or pressing issue arises.

Redirection Plan

Staff members must receive training regarding *imbalances of power* between children and how these may develop or unfold. Negative behavior must be redirected: bullying, manipulation, shaming or demeaning behaviors. When necessary, be prepared to contact a parent or guardian for removal of the aggressive child.

Action Steps:

- Include specific examples in staff training to recognize and redirect negative behaviors.
- Create an ongoing Redirection Plan to establish appropriate guidelines for staff members when encountering aggressive behaviors.

Removal Plan

Every Ministry should develop a Child Removal Plan before children are gathered for programming. Removal is an option if a child engages in abusive behavior or repeatedly resists redirection related to harmful behavior toward another child, such as bullying, manipulation, shaming or demeaning behaviors.

Action Plan:

- Create a Child Removal Plan, including a parent communication component.
- Train staff members to understand and abide by a defined Child Removal process.

Internal Communication Plan

Each Ministry should create a clear Internal Communication Plan allowing each staff member to clearly grasp (1) information to be communicated; (2) to whom; (3) in what form; and (4) in what time frame. The Internal Communication framework should encourage communication related to brewing *imbalances of power*, bullying behaviors, policy violations by staff members, and other important information. Some types of behavior may require an external report to appropriate authorities (i.e., forms of abuse or neglect) – see External Reporting Plan.

Action Steps:

- Create an Internal Communication Plan which includes reporting structure, communication timelines and staff accountability.
- Train staff members to understand and abide by the Internal Communication Plan.

External Reporting Plan

Each Ministry must abide by legal reporting requirements related to child abuse and neglect. Consistent with relevant law and licensure, the Ministry should create an External Reporting Plan outlining (1) *who* is required to report child abuse or neglect; (2) *how* and *to whom* a report must be made; and (3) *what* information to include in pre- and post-report internal documentation.

Action Steps:

- Create an External Reporting Plan, including federal, state and local mandatory reporting requirements.
- Train staff members to understand and abide by the External Reporting Plan.

Registration Disclosure (optional)

The individual(s) most likely to have knowledge of a child’s propensity to engage in abusive or bullying behaviors is the child’s parent or guardian – who is typically engaged in the program’s registration process. Consider adding a question or section in the registration process specifically asking whether the child has engaged in behaviors harmful to another child.

Example

PARENT AFFIRMATION

I have reviewed this application or registration form, and I believe all the information provided is true, correct and complete. I am unaware of any fact or circumstance involving my child that would call into question the wisdom of entrusting my child to interact with other children. To my knowledge, my child has never physically or sexually abused another child, or participated in sexually aggressive behavior with another child.

Parent Signature _____ *Date* _____

Parent’s Full Name (please print) _____

Communication to Campers (optional)

The risk of Peer Sexual Abuse may be further reduced with a clear communication to program participants during orientation concerning what IS or IS NOT acceptable behavior in the program. Consider specific communication regarding boundaries, forms of acceptable and unacceptable touch, behavior in shared bathroom or shower space, or in bunks and sleeping areas. Follow this with a clear communication that ‘we will believe you’ and will address behaviors that make any child uncomfortable.

By clearly communicating BOUNDARIES, the sexually aggressive or bullying child is placed on notice about the consequences of a boundary violation. Correspondingly, the child who is the object of bullying or abuse (or *witnesses* bullying or abuse of others) receives a clear pathway of communication to Ministry or program leaders.



Love & Norris, Attorneys at Law. Gregory Love and Kimberlee Norris have a nationwide sexual abuse litigation practice representing victims of sexual abuse throughout the country. In addition, Love and Norris provide consulting services to ministry and secular child-serving organizations providing services to children, including churches, camps, schools, missional entities, youth sport organizations, mentoring programs and non-profits.

MinistrySafe and Abuse Prevention Systems. In addition to an active law practice, Love and Norris are co-founders and Directors of **MinistrySafe** and **Abuse Prevention Systems**, entities dedicated to sexual abuse awareness and prevention. **MinistrySafe** and **Abuse Prevention Systems** provide Sexual Abuse Awareness Training (live and online) and assist ministries and child-serving organizations in the design and implementation of safety systems that reduce the risk of child sexual abuse.