



## UNDERSTANDING CALIFORNIA SENATE BILL 848 (SB848)

# **New legislation creates child sexual abuse compliance standards for California Private Schools**

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# EXECUTIVE SUMMARY

## CA SENATE BILL 848

California Senate Bill 848 (SB848), known as the ‘Safe Learning Environments Act,’ was signed into law by Governor Newsom on October 7, 2025. This law aims to strengthen student protection against sexual abuse and misconduct in K-12 schools, *including Private Schools*. The **key provisions** relating to Private Schools are outlined on the following pages. **MinistrySafe and Abuse Prevention Systems (APS)** can help Private Schools comply with many of the new requirements.

## HIGHLIGHTED SB848 FOR EASIER REVIEW

SB848 is long and complicated. To allow Private School administrators to more easily access and understand the Safe Learning Environments Act, a **highlighted version** of the legislation can be accessed here: [California SB848 \(Highlighted\)](#).



# SUMMARY OF KEY PROVISIONS

SB848 requires that Private Schools have the following prevention/reporting elements in place.

- **STRENGTHENED POLICIES:** By July 1, 2026, Private Schools are required to adopt written policies on appropriate interactions and professional boundaries between students and school employees, volunteers, contractors and other students [SECTION 1]. **See Addendum No. 1**
- **EXPANDED TRAINING:** Starting July 1, 2026, Private Schools are required to annually train their employees and volunteers on abuse/assault prevention and mandatory reporting. Alternative trainings approved by the Private School's liability insurance carrier can satisfy the new training obligation [SECTION 10]. **See Addendum No. 2**
- **APPLICANT DISCLOSURE:** When applying for a position at a Private School, an applicant is required to provide to the prospective Private School employer a complete list of every educational entity with whom the applicant has been previously employed [SECTIONS 6 & 12]. **See Addendum No. 3**
- **ENHANCED SCREENING:** During hiring, Private Schools are required to inquire about a candidate's prior credible allegations or substantiated misconduct investigations at other schools and to follow up with those schools. Private Schools must also respond to requests for information from other schools about job candidates [SECTIONS 6 & 12]. **See Addendum No. 3**
- **RECORD PRESERVATION:** Private Schools must refrain from expunging or destroying any records related to an employee involving credible complaints of, substantiated investigations into, or discipline for, egregious misconduct [SECTION 12]. **See Addendum No. 3**
- **MISCONDUCT DATABASE:** By July 1, 2027, a Statewide Data System must be established, tracking substantiated investigations of employee misconduct and accessible to Private Schools for employment screening. Private Schools are required to report information to the Data System [SECTION 7]. **See Addendum No. 3**
- **NON-DISCLOSURE AGREEMENTS:** Private Schools are prohibited from entering into non-disclosure agreements or other practices designed to conceal credible allegations of employee misconduct from personnel records [SECTION 12]. **See Addendum No. 3**
- **MANDATORY REPORTERS:** The list of those in California required to make a report related to child abuse or maltreatment –'mandated reporters'– now includes Private School stakeholders: employees, volunteers, board members, and certain contractors; complete list of mandated reporters is found in CA Penal Code Section 11165.7 [SECTION 14]. **See Addendum No. 4**
- **COMPREHENSIVE SCHOOL SAFETY PLAN:** Though not yet required for Private Schools, it is valuable for Private School administrators to evaluate the Comprehensive School Safety Plan elements for use as guidelines and best practices [SECTIONS 2, 3, 4 & 4.5] **See SB848 original text**

MinistrySafe and Abuse Prevention Systems can help Private Schools comply with many of the new SB848 requirements. [LEARN MORE.](#)

# RESOURCES FOR COMPLIANCE

MinistrySafe and Abuse Prevention Systems Trainings can help Private Schools meet Training obligations established by the Safe Learnings Environment Act.

## TRAINING

Training requirements can be satisfied using the training provided by the California State Department of Social Services.

Private Schools may also use an **alternative training** approved by the Private School's liability insurance provider; see *below SB848 Section 10d excerpt*.

When approved by your Private School's liability insurance carrier, Trainings provided by MinistrySafe and Abuse Prevention Systems can satisfy the new training obligation.

### SB848 Section 10d (1) and (2)

*(1) Private schools ... that do not use the online training module provided by the State Department of Social Services shall use an equivalent training module developed specifically to meet the requirements of this section and report that training to the State Department of Education.*

*(2) The **alternative training module shall be approved by the public entity risk pool joint powers authority or liability insurance provider used by the ... private school ...***

*"As California compliance experts, we rely on MinistrySafe and Abuse Prevention Systems to satisfy sexual abuse prevention requirements across the country, including those required in California pursuant to AB506 and SB848."*

Max Herr, Founder & Principal  
Church & Ministry Compliance Consulting

MinistrySafe and APS Trainings related to sexual abuse prevention and reporting have the approval of several insurance companies that provide coverage to child-serving organizations.

Check with your insurance provider or a [MinistrySafe/APS representative](#) to learn whether MinistrySafe/APS Trainings are approved for use as an acceptable training alternative for your Private School.

**MinistrySafe/APS California-Specific Sexual Abuse Awareness Training** – provides instruction related to:

- Abuser Characteristics
- The Abuser's 'Grooming Process'
- Common Grooming Behaviors
- Peer to Peer Sexual Abuse
- Impact of Abuse on a Child
- California Reporting Requirements
- California Reporting Process

In addition, MinistrySafe/APS provides resources and guidance relating to [California Assembly Bill 506](#), requirements for 'Youth Service Organizations.'

# RESOURCES FOR COMPLIANCE

## TRAINING MANAGEMENT

SB848 creates administrative requirements. Pursuant to Section 44691(b)(2), obligations are established involving when to train, how often to train, and requirements related to reporting training completions.

MinistrySafe and Abuse Prevention Systems offer an **online management system** allowing school administrators:

- To initiate trainings assignments
- Track training results
- Periodically refresh training, and
- Generate reports related to completion.

The MinistrySafe/APS **Control Panel** provides Private School administrators with the ability to manage additional elements of student safety efforts, including:

- An online application builder
- Automated online reference checking
- Online Policy e-acknowledgments
- Library of sample forms

MinistrySafe/APS resources can help satisfy many new legislative requirements as well as other Safety System elements.

## STUDENT SAFETY POLICIES

SB848 requires that Private Schools adopt and implement policies and plans that promote a safe learning environment for students. Pursuant to Section 32100(b), the obligations make reference to appropriate boundaries, forms of communication (in and out of school programming), and a focus on risk within school facilities.

MinistrySafe and Abuse Prevention Systems are working with schools across the country to design and implement effective Policies and Procedures to create student safe environments.

MinistrySafe/APS offers the following sample Policy forms for Private Schools:

- Core School Safety Policies & Procedures
- Supplemental Policies – Athletic Programs
- Supplemental Policies – Fine Arts Programs
- Comprehensive Student Safety Framework\*

The MinistrySafe/APS online Control Panel provides Private School administrators with the ability to upload and electronically send Policy forms to faculty, staff members and volunteers for e-acknowledgment.

## ABOUT THE AUTHORS

Kimberlee Norris and Gregory Love are partners in the Fort Worth, Texas law firm of Love & Norris and founders of Abuse Prevention Systems and MinistrySafe, providing child sexual abuse expertise to organizations worldwide. After representing victims of child sexual abuse for more than three decades, Love and Norris saw recurring, predictable patterns in predatory behavior. Abuse Prevention Systems and MinistrySafe grew out of their desire to place proactive tools into the hands of child-serving professionals. Together, Gregory Love and Kimberlee Norris teach the only graduate-level course dedicated to sexual abuse prevention as Visiting Faculty at Dallas Theological Seminary.



# ADDENDUM 1

## LEGISLATIVE INTENT | POLICIES & PROCEDURES

### Brief Analysis

Effective July 1, 2026.

The purpose and legislative intent of the 'Safe Learning Environment Act' is to protect students from sexual offenses committed by adults (school employees, volunteers and contractors) and peers (other students).

The California legislature intends to accomplish this, in part, by requiring all schools – including Private Schools – to adopt written Policies that promote safe environments. The matters to be addressed by the written Policies include, but are not limited to, the following:

- Boundaries between the student and others (adults and other students);
- Boundaries related to contact during and outside typical school programming; and
- Boundaries related to communication (including social media and electronic communication).

MinistrySafe and Abuse Prevention Systems (APS) provide sample Policy forms related to student safety in core school programming, as well as Supplemental Policy forms for Athletics and Fine Arts. All Policies dovetail with MinistrySafe/APS online Trainings. [LEARN MORE.](#)

**SECTION 1.** Article 10 (commencing with Section 32100) is added to Chapter 1 of Part 19 of Division 1 of Title 1 of the Education Code, to read:

#### Article 10. Professional Boundaries Between Adults and Pupils and the Safety of Learning Environments

32100. (a) *It is the intent of the Legislature that school districts, schools operated by county offices of education, charter schools, private schools, and state special schools and diagnostic centers operated by the department be safe and nurturing places for pupils that are free of fear and threats of violence and free of violent crimes and sexual offenses committed by, or intended to be committed by, other pupils, school employees, volunteers, and contractors.*
- (b) *On or before July 1, 2026, each governing board of a school district, county board of education, and governing body of a charter school or private school, and the department, for purposes of state special schools and diagnostic centers operated by the department, shall do both of the following:*
- (1) *Adopt written policies that promote safe environments for pupil learning and engagement, consistent with the legislative intent specified in subdivision (a), and that do both of the following:*
    - (A) *Explicitly address professional boundaries (i) between pupils and school employees, adult volunteers, and school contractors, (ii) among and between pupils, and (iii) among and between adults employed, volunteering, or under contract.*
    - (B) *Establish appropriate limits on contact during or outside of the school-day between pupils and school employees, volunteers, and school contractors via social media internet platforms, text messaging, and other forms of communication that do not otherwise include the pupil's parent or guardian. The policies may vary the limitations based on the age or grade of the pupil.*
  - (2) *Adopt written policies, plans, or specifications regarding school facilities, and the furnishing of school facilities, that address classroom and nonclassroom environments to promote safe environments for learning and engagement that are easily supervised.*

# ADDENDUM 2

## TRAINING DEVELOPMENT/REQUIREMENTS FOR PRIVATE SCHOOLS

### Brief Analysis

Effective July 1, 2026.

Private Schools are required to provide annual training to employees and volunteers. The training must include information about child abuse and maltreatment, and must include the specific topics, including but not limited to:

- Sexual abuse/assault risk by certain people: school personnel, volunteers and other students;
- Sexual abuse/assault risk in school-sponsored programs;
- Reporting requirements and reporting process; and
- Penalties for failure to report.

To satisfy the training requirement, Private Schools can use the online training module provided by the State Department of Social Services or use an alternative ‘equivalent training.’ The alternative training must be approved by the Private School’s liability insurance provider, and reported to the State Department of Education.

Private Schools must implement a process for training and a mechanism for establishing proof of training completion, with the ability to demonstrate compliance to an appropriate oversight entity.

MinistrySafe and Abuse Prevention Systems (APS) provide Sexual Abuse Awareness Training through an online Control Panel. The MinistrySafe/APS system provides Certificates of Completion, reporting functionality and the ability to periodically refresh or renew Training. Private Schools should consult with their liability insurance carrier as to whether the MinistrySafe/APS Training is approved as an alternative. [LEARN MORE.](#)

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**SECTION 10.** Section 44691 is added to the Education Code, to read:

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(b) ... *private schools* ... *shall do the following:*

- (1)(A) *Provide annual training, using the online training module provided by the State Department of Social Services or as provided in subdivision (d), to their employees, volunteers, and persons working on their behalf who are mandated reporters, as defined in Section 11165.7 of the Penal Code, pursuant to this section and subdivision (d) of Section 11165.7 of the Penal Code on the mandated reporting requirements. This training shall include information that failure to report an incident of known or reasonably suspected child abuse or neglect, as required by Section 11166 of the Penal Code, is a misdemeanor punishable by up to six months confinement in a county jail, or by a fine of one thousand dollars (\$1,000), or by both that imprisonment and fine.*
- (B) *Provide annual training on the prevention of abuse, including sexual abuse and assault, of children on school grounds, by school personnel and volunteers, or in school-sponsored programs.*
- (C) *The training provided pursuant to subparagraphs (A) and (B) shall be provided to school personnel hired during the course of the school year and to volunteers upon commencing volunteer services.*
- (D) *It is the intent of the Legislature that the child abuse prevention content, as added by Assembly Bill 1913 of the 2023–24 Regular Session, will not add to the duration of training requirements pursuant to this section, as it read on January 1, 2024, but instead only alter the content of those training requirements.*

# ADDENDUM 2 (CONTINUED)

## TRAINING DEVELOPMENT/REQUIREMENTS FOR PRIVATE SCHOOLS

### SECTION 10. Section 44691(b) continued:

- (2) *Develop a process for all persons required to receive training pursuant to this section to provide proof of completing the training within the first six weeks of each school year, within the first six weeks of that person's employment, or within six weeks of commencing volunteer services. The process developed under this paragraph may include, but not be limited to, the use of a sign-in sheet or the submission of a certificate of completion to the applicable governing board or body of the school district, county office of education, state special school or diagnostic center operated by the State Department of Education, private school, or charter school.*
- (c) (1) *... private schools ... that do not use the online training module provided by the State Department of Social Services shall use an equivalent training module developed specifically to meet the requirements of this section and report that training to the State Department of Education.*
- (2) *The alternative training module shall be approved by the public entity risk pool joint powers authority or liability insurance provider used by ... private school ... .*
- (d) *For purposes of this section, a volunteer is a person who is over 18 years of age and who interacts with pupils outside of the immediate supervision and control of the pupil's parent or guardian or a school employee.*
- (e) *A person who has completed the mandated reporter training provided by the State Department of Social Services and received a certificate of completion within the previous 12 months shall be deemed to satisfy the training requirements specified in this section.*
- (f) *It is the intent of the Legislature that the child sexual abuse and assault content, as added by Senate Bill 848 of the 2025–26 Regular Session, will not add to the duration of training requirements pursuant to this section, as it read on January 1, 2025, but instead only alter the content of those training requirements.*
- (g) *This section shall become operative on July 1, 2026.*

MinistrySafe and Abuse Prevention Systems (APS) provide Sexual Abuse Awareness Training through an online Control Panel. The MinistrySafe/APS system provides Certificates of Completion, reporting functionality and the ability to periodically refresh or renew Training. Private Schools should consult with their liability insurance carrier as to whether the MinistrySafe/APS Training is approved as an alternative. [LEARN MORE.](#)



# ADDENDUM 3

## EDUCATION EMPLOYMENT | MISCONDUCT DISCLOSURES

### Brief Analysis

Effective January 1, 2026.

Statewide Data Systems to come online by July 1, 2027.

All schools and school personnel – including Private Schools – are required to participate in a misconduct information disclosure system.

#### ■ APPLICANT: MUST PROVIDE LIST – SECTIONS 6 & 12

When applying for a position at a Private School, an applicant seeking any position at a Private School is required to provide to the prospective Private School employer a complete list of every educational entity with whom the applicant has been previously employed.

#### ■ PRIVATE SCHOOL: MUST INVESTIGATE LIST – SECTIONS 6 & 12

A Private School considering an applicant for any position must make inquiry to every educational entity disclosed by the applicant as to whether the applicant was the subject of a misconduct complaint or investigation.

#### ■ PRIOR SCHOOL: MUST DISCLOSE – SECTIONS 6 & 12

When a Private School on an applicant's disclosure list is contacted, the Private School must disclose to the hiring school (1) whether an 'egregious misconduct' report was made to the Commission on Teacher Credentialing; and (2) provide to the hiring school a copy of all relevant information within its possession used to support a substantiated investigation.

#### ■ STATEWIDE DATA SYSTEM – SECTION 7

A Statewide Data System will be created on or before July 1, 2027 (assuming financial appropriation). Within 30 days of hire, all Private Schools are to provide to the Statewide Data System the name, start date and title of every person hired to provide services at a Private School.

Before hiring a person for any position at a Private School, the Private School must review the Statewide Data System to determine whether an investigation resulted in a substantiated report.

#### ■ RECORD KEEPING – SECTION 12

Private Schools must refrain from expunging or destroy any records related to an employee involving credible complaints of, substantiated investigations into, or discipline for, egregious misconduct.

Private Schools cannot enter into any agreement that would prevent a mandatory report of egregious conduct.

# ADDENDUM 3 (CONTINUED)

## EDUCATION EMPLOYMENT | MISCONDUCT DISCLOSURES

**SECTION 6.** Section 44051 is added to the Education Code immediately following Section 44050, to read:

44051. (a) (1) *A person applying for a noncertificated position at a school district, county office of education, charter school, or state special school or diagnostic center operated by the department, or applying for any position at a private school, shall provide that prospective employer with a complete list of every school district, county office of education, charter school, state special school and diagnostic center operated by the department, and private school that the applicant has previously been an employee of.*

(2) *School districts, county offices of education, charter schools, and state special schools and diagnostic centers operated by the department considering an applicant for a noncertificated position, and private schools considering an applicant for any position, shall inquire with each school district, county office of education, charter school, state special school and diagnostic center operated by the department, and private school that previously employed the applicant, as disclosed pursuant to paragraph (1), as to whether the applicant, while previously employed by the school district, county office of education, charter school, state special school or diagnostic center operated by the department, or private school was the subject of any credible complaints of, substantiated investigations into, or discipline for, egregious misconduct, as defined in paragraph (1) of subdivision (a) of Section 44932, that were used to support a substantiated investigation.*

(3) *School districts, county offices of education, charter schools, state special schools and diagnostic centers operated by the department, and private schools that have made a report of an employee's egregious misconduct to the Commission on Teacher Credentialing shall disclose this fact to a school district, county office of education, charter school, state special school or diagnostic center operated by the department, or private school considering an application for employment from the employee, upon inquiry, and, notwithstanding any other law, shall provide the inquiring school district, county office of education, charter school, state special school or diagnostic center operated by the department, or private school with a copy of all relevant information that was used to support a substantiated investigation, within its possession.*

(b) *For purposes of this section, noncertificated employees include noncertificated temporary employees regardless of the length of their employment.*

# ADDENDUM 3 (CONTINUED)

## STATEWIDE DATA SYSTEM | GATHERING MISCONDUCT INFORMATION

**SECTION. 7.** Section 44052 is added to the Education Code, immediately following Section 44051, to read:

44052. (a) *On or before July 1, 2027, the commission shall, contingent upon an appropriation for these purposes in the annual Budget Act or another statute, develop a statewide data system that includes all of the following information for individuals serving in a noncertificated position for a local educational agency or in any position for a private school employer:*
- (1) The name, date of birth, and a unique identification number of the employee.*
  - (2) The name of the school employer.*
  - (3) The starting date, ending date, if applicable, and title for each school position held by the employee.*
  - (4) The name of any local educational agency or private school employer that conducted an employee investigation for egregious misconduct that resulted in evidence for a substantiated report, as defined in Section 11165.12 of the Penal Code, on or after July 1, 2027.*
  - (5) The date an investigation described in paragraph (4) was commenced.*
  - (6) The date a substantiated report described in paragraph (4) was filed.*
- (b) *Those local educational agencies and private school organizations that are responsible for employment, employee investigations, or hiring decisions shall, before hiring an individual for a noncertificated position at a local educational agency or any position at a private school employer, review the statewide data system established pursuant to subdivision (a) to determine whether an investigation resulted in a substantiated report pursuant to paragraph (4) of subdivision (a).*
- (c) *Within 30 calendar days of hiring an individual for a noncertificated position at a local educational agency or for any position at a private school employer, the local educational agency employer or private school employer shall provide to the statewide data system established pursuant to subdivision (a) the name and start date of the individual and the title of the position.*

# ADDENDUM 3 (CONTINUED)

## STATEWIDE DATA SYSTEM | GATHERING MISCONDUCT INFORMATION

**SECTION. 12.** Section 44939.5 of the Education Code is amended to read:

- 44939.5. (a) School districts, county offices of education, charter schools, state special schools and diagnostic centers operated by the department, and private schools shall not enter into an agreement that would prevent a mandatory report of egregious misconduct, as defined in paragraph (1) of subdivision (a) of Section 44932, to the Commission on Teacher Credentialing or any other state or federal agency.
- (b) School districts, county offices of education, charter schools, state special schools and diagnostic centers operated by the department, and private schools shall not expunge from an employee's personnel file, nor shall they enter into an agreement that would authorize expunging from an employee's personnel file, credible complaints of, substantiated investigations into, or discipline for, egregious misconduct, as defined in paragraph (1) of subdivision (a) of Section 44932. This prohibition does not preclude removing, or entering into an agreement to remove, documents containing allegations that have been the subject of a hearing before an arbitrator, school board, personnel commission, Commission on Professional Competence, or administrative law judge, in which the employee prevailed, the allegations were determined to be false, not credible, or unsubstantiated, or a determination was made that the discipline was not warranted.
- (c) (1) A person applying for a certificated position at a school district, county office of education, charter school, state special school or diagnostic center operated by the department, or private school shall provide that prospective employer with a complete list of every school district, county office of education, charter school, state special school or diagnostic center operated by the department, and private school that the applicant has previously been an employee of.
- (2) School districts, county offices of education, charter schools, state special schools and diagnostic centers operated by the department, and private schools considering an applicant for a certificated position shall inquire with each school district, county office of education, charter school, state special school and diagnostic center operated by the department, and private school that previously employed the applicant, as disclosed pursuant to paragraph (1), as to whether the applicant, while previously employed by the school district, county office of education, charter school, state special school or diagnostic center operated by the department, or private school was the subject of any credible complaints of, substantiated investigations into, or discipline for, egregious misconduct, as defined in paragraph (1) of subdivision (a) of Section 44932, that were required to be reported to the Commission on Teacher Credentialing.
- (3) School districts, county offices of education, charter schools, state special schools and diagnostic centers operated by the department, and private schools that have made a report of an employee's egregious misconduct to the Commission on Teacher Credentialing shall disclose this fact to a school district, county office of education, charter school, state special school or diagnostic center operated by the department, or private school considering an application for employment from the employee, upon inquiry, and, notwithstanding any other law, shall provide the inquiring school district, county office of education, charter school, state special school or diagnostic center operated by the department, or private school with a copy of all relevant information that was reported to the Commission on Teacher Credentialing, within its possession.
- (d) Any school employee who alleges that another school employee has engaged in egregious misconduct, as defined in paragraph (1) of subdivision (a) of Section 44932, knowing at the time of making the allegation that the allegation was false, shall be subject to certificate revocation, if applicable.

# ADDENDUM 4

## LIST OF MANDATORY REPORTERS AS MODIFIED – INCLUDES PRIVATE SCHOOLS

### Brief Analysis

Effective January 1, 2026.

The list of the people in California required to make a report related to child abuse, neglect or maltreatment – ‘mandated reporters’ – is found in Penal Code Section 11165.7. That list now includes Private Schools stakeholders: employees, volunteers, board members, and certain contractors.

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**SECTION 14.** Section 11165.7 of the Penal Code is amended to read:

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11165.7 (a) *As used in this article, “mandated reporter” is defined as any of the following:*

- (1) *An employee, volunteer, or governing board or body member of a school district, county office of education, charter school, or private school. For purposes of this paragraph, a volunteer is a person who is over 18 years of age and who interacts with pupils outside of the immediate supervision and control of the pupil’s parent or guardian or a school employee.*
- (2) *An employee, volunteer, or board member of a public or private school, contractor to a school district, county office of education, charter school, state special school or diagnostic center operated by the State Department of Education, or private school whose duties require contact with or supervision of pupils at that school district, county office of education, charter school, state special school or diagnostic center operated by the State Department of Education, or private school. For purposes of this paragraph, a volunteer is a person who is over 18 years of age and who interacts with pupils outside of the immediate supervision and control of the pupil’s parent or guardian or a school employee.*