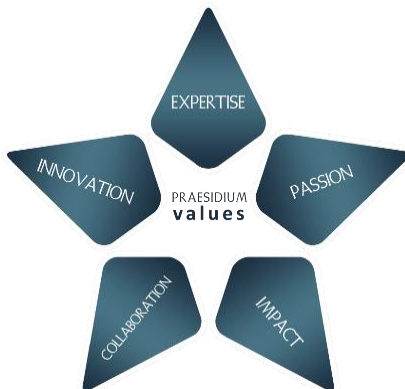


Safeguarding for Your Organization: How to Minimize Abuse Risk and Protect Your Clients

Presented by
PRAESIDIUM
In partnership with FADICA

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About Praesidium



“To help you **protect those in your care** from abuse and to help **preserve trust** in your organization.”

Over two decades of experience

More than **4,000 clients** across diverse industries

Completed thousands of **root cause analyses**

Developed proprietary **abuse risk management model**

Offer complete range of **risk management solutions**

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We believe abuse is
PREVENTABLE

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Trend Forecasting

Industry Trends

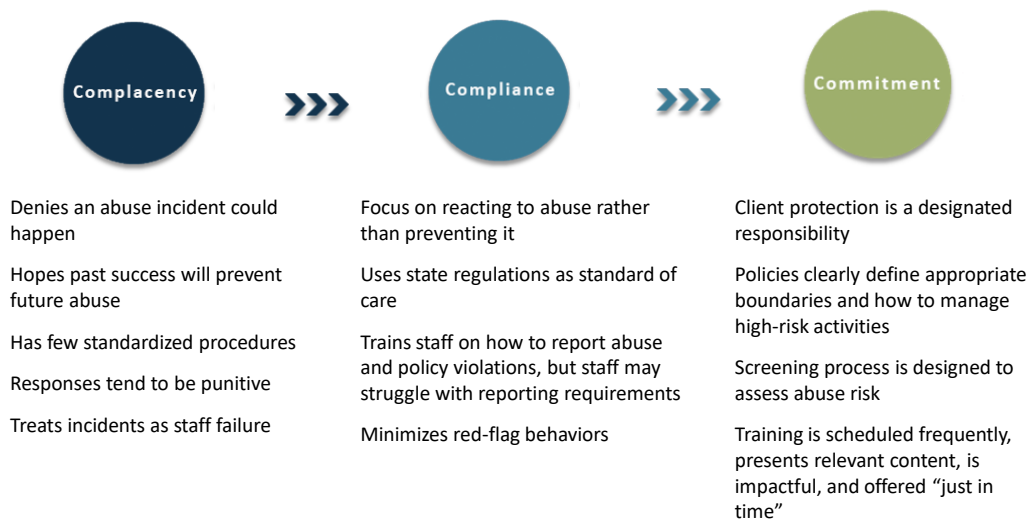
- Headline news
- Increased community expectations
- Lower community tolerance
- Increased industry standards
- Less immunity
- Increased challenges to statutes of limitation
- Increased litigation

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The Challenge

- ✓ Competing demands
- ✓ Low frequency, high impact event
- ✓ Complacency and Compliance
 - “we know everyone here”
 - “we’ve never had a serious incident”
 - “all of our staff undergo background checks”
 - “we train all of our staff on mandated reporting”
 - “we must adhere to all state licensing requirements”

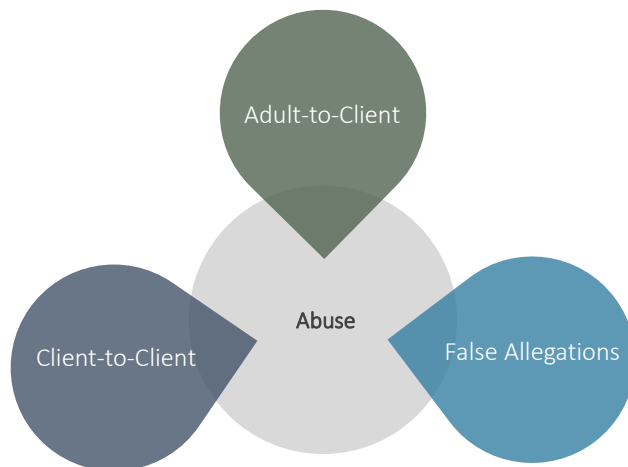
Continuum of Commitment



Foundational Knowledge

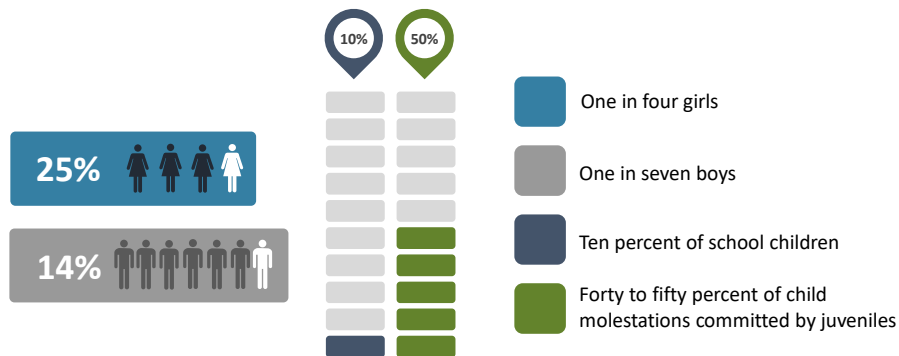
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Safeguarding Risks



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Scope of the Problem

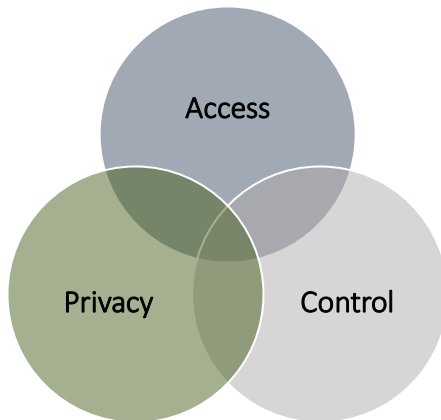


Youth-to-Youth Abuse



"Hidden horror of school sex assaults revealed," [Associated Press](#) (May 2017)

How Adult Offenders Operate



✓ Access

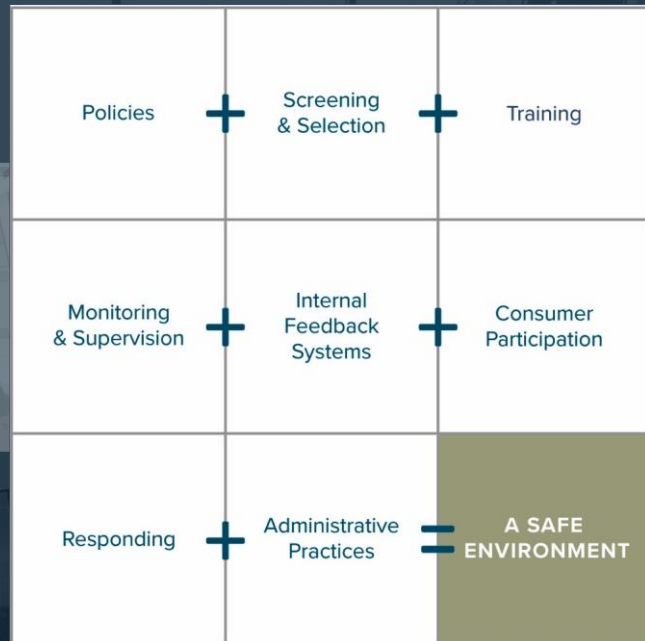
✓ Privacy

✓ Control

Warning Signs in Adult Offenders

- ✓ Prefers time and friendships with youth more than adults
- ✓ Gives special gifts to clients, especially without permission
- ✓ Engages in too much physical contact with clients
- ✓ Bends the rules for certain clients
- ✓ Ignores policies about interacting with clients
- ✓ Has “favorite” or preferred clients
- ✓ Uses inappropriate language or jokes
- ✓ Behaves as a peer with clients rather than a supervising adult
- ✓ Uses social networking sites and text messages to contact clients privately or away from programming
- ✓ Finds reasons to spend time alone with clients

Praesidium Safety Equation[®]



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Policies

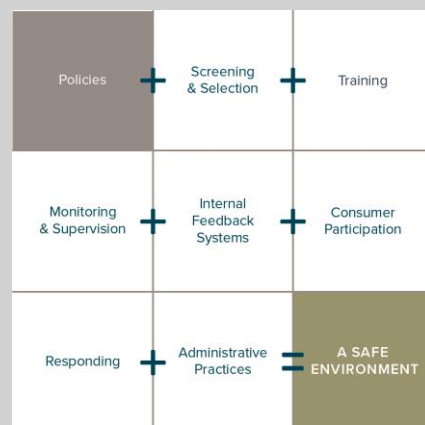
Policies help communicate a zero tolerance for abuse and create a bandwidth of acceptable behavior.

Best Practices:

Define boundaries and interactions with clients

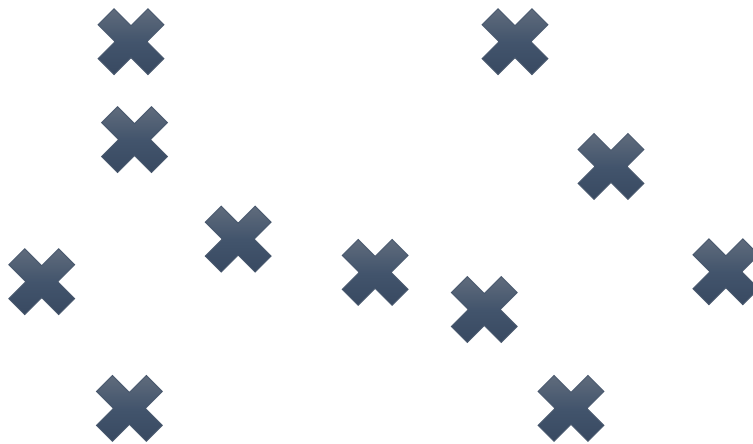
Communicate expectations effectively

Create institutional memory



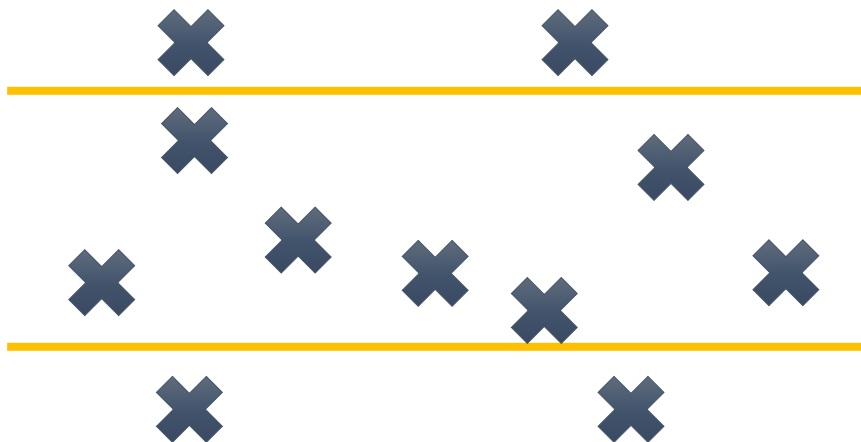
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Bandwidth of Acceptable Behavior



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Bandwidth of Acceptable Behavior



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Common Policy Gaps



Electronic Communication



Physical Contact



Verbal Interactions



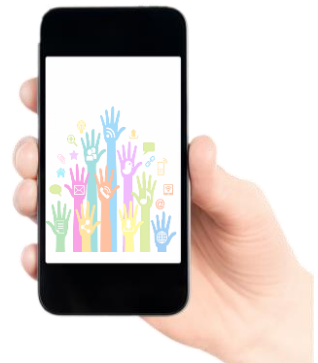
Staff Cell Phone Use



One-on-One Interactions

Define Boundaries

- ✓ Physical interactions
- ✓ Verbal interactions
- ✓ Electronic communications and social media
- ✓ Incidental and not incidental contact outside program activities
- ✓ Managing one-on-one situations
- ✓ Favoritism
- ✓ Gift giving and receiving



Protecting Yourself from False Allegations

- ✓ Follow policies about appropriate and inappropriate interactions
- ✓ Use the rule of “three or more” and “line of sight”
- ✓ Don’t show favoritism
- ✓ Avoid, address, and respond to crushes
- ✓ No secrets with clients
- ✓ Avoid gift-giving
- ✓ Avoid non-group social media and electronic communications

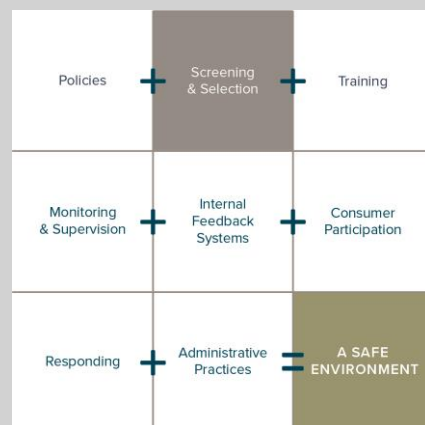
Ask yourself: How would this appear to an outsider?

Screening & Selection

Screening and selection practices help control who has access to your clients.

Best Practices:

- Encourage applicants to self-select out
- Assess abuse risk
- Behaviorally-based interview questions
- Integrate all information

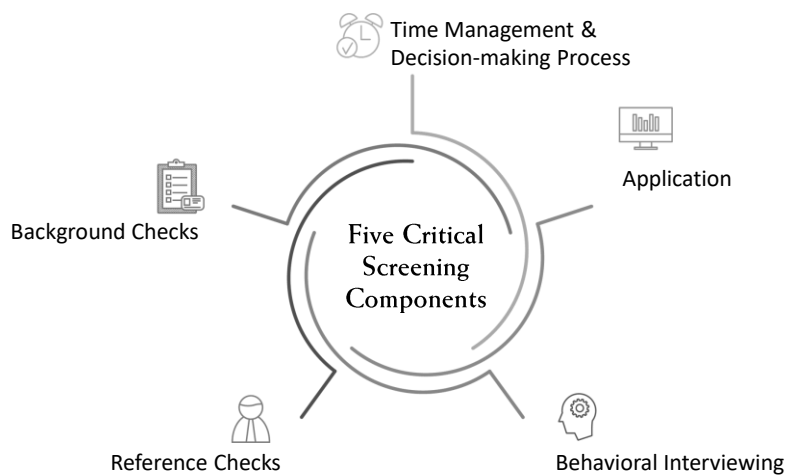


Background Check Dilemma

- ✓ Less than 5% of offenders have criminal records
- ✓ There is no perfect criminal records search
- ✓ Therefore, need to systematically discover and consider everything you can about an applicant in addition to background checks

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Five Critical Screening Components



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Training

Training teaches all individuals how to perform their role in safeguarding efforts.

Best Practices:

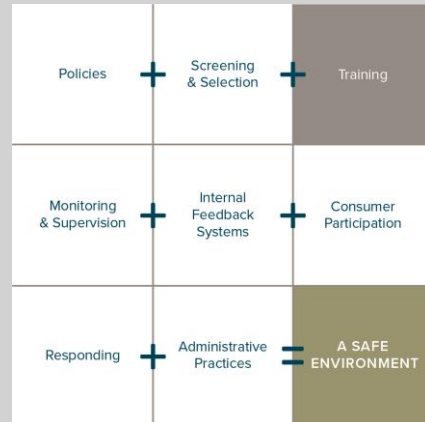
Right content at the right time

Routinely schedule

Use as “reminders”

Make an active part of supervision

Blended learning



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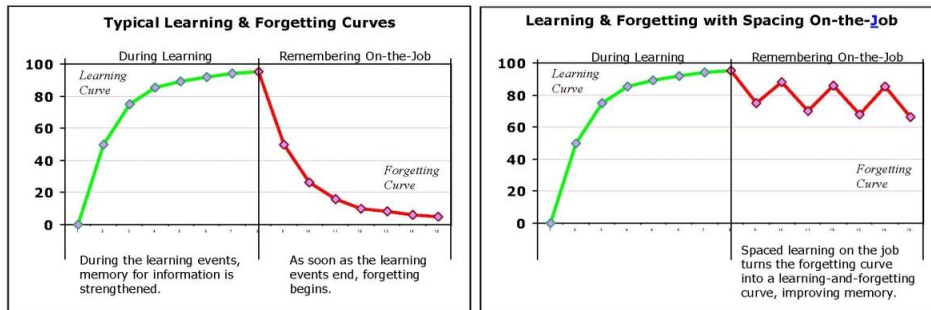
Effective Training

- ✓ Training must be specific, frequent, and practical
- ✓ Should teach:
 - ✓ How offenders operate
 - ✓ Recognizing and responding to red-flag or inappropriate interactions
 - ✓ How to effectively monitor and supervise high-risk activities
 - ✓ How to prevent client-to-client sexualized behaviors
 - ✓ How to respond effectively

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Spacing Effect



Source: Thalheimer, W. (2006, February). *Spacing Learning Events Over Time: What the Research Says*. Retrieved October 23, 2013, from <http://www.work-learning.com/catalog/>

Monitoring and Supervision

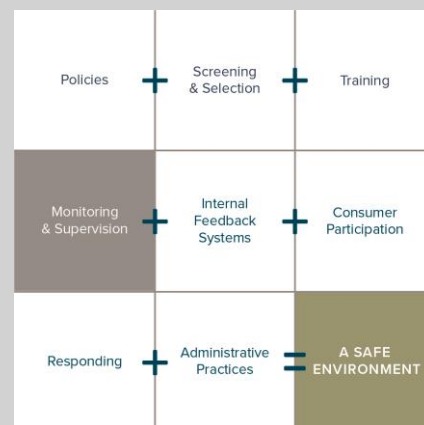
Monitoring and supervision practices decrease the opportunity for privacy and inappropriate behaviors.

Best Practices:

Monitor client interactions

Supervise staff and volunteers

Manage high-risk locations and activities



The Role of Monitoring and Supervision

- ✓ Supplements the screening and selection process
- ✓ Implements policy into action
- ✓ Ensures training becomes practice
- ✓ Protects your organization

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Strategies & Tools for Supervisors & Managers

- Exception monitoring
- Scheduled observation / unscheduled observation
- Regular and random visits to programs
- Formal and informal interviews or questioning
- Self-reports
- Suggestion boxes
- Satisfaction surveys (internal/external)
- Written documentation
- Summary and trending incident data
- Electronic surveillance
- Meetings
- Performance evaluations

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When to Increase Supervision

- ✓ New personnel
- ✓ Changes in personnel
- ✓ New client
- ✓ Changes in client behavior
- ✓ After an anonymous report
- ✓ After an incident
- ✓ During unusual or high-risk events

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High-Risk Situations

Activity Risks

- ✓ Hygiene time
- ✓ Personal care assistance
- ✓ Sleeping or overnight time
- ✓ Transportation
- ✓ Periods of transition
- ✓ One-on-one interactions
- ✓ Mixed age groups
- ✓ Free or unstructured time

Architectural Risks

- ✓ Isolated areas or spaces
- ✓ Rooms without windows for informal monitoring
- ✓ Bathrooms
- ✓ Bedrooms or residential spaces
- ✓ Vehicles

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Create a Formalized Monitoring System

Step 1: Identify architectural, facility, and activity risks



Step 2: Determine a system for monitoring these areas



Step 3: Determine a method for documentation of monitoring



Step 4: Create a method to review this documentation

Decreasing Client-to-Client Abuse Risks

- ✓ Structured activities at all times
- ✓ Maintain approved ratios
- ✓ Line-of-sight supervision
- ✓ Follow guidelines for affection
- ✓ Maintain “zero tolerance”
- ✓ Document and report policy violations
- ✓ Respond to incidents of client-to-client sexual activity

Internal Feedback Systems

Internal feedback sends information about safeguarding efforts to all levels in the organization.

Best Practices:

Incorporate systems for internally reporting concerns, complaints, and grievances

Collect, compile, and analyze data related to safeguarding

Remove barriers to reporting



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Internal Feedback Systems

✓ Identify potential gaps through:

- ✓ Complaints from employees, volunteers, or clients
- ✓ Serious or frequent incidents
- ✓ Violations noted by external licensing or regulatory bodies

✓ Information about program operations can identify:

- ✓ High-risk programs or individuals
- ✓ Where increased monitoring, supervision, training, or policy changes may be needed
- ✓ Whether a program should be allowed to continue operating

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Consumer Participation

Consumer participation educates and involves clients and their families in safeguarding efforts.

Best Practices:

Empower clients with self-protection information

Educate on appropriate boundaries with staff and volunteers

Provide clients and families with multiple ways to report concerns



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Responding

Responding results in an immediate response to red-flag behavior and to suspicions of abuse.

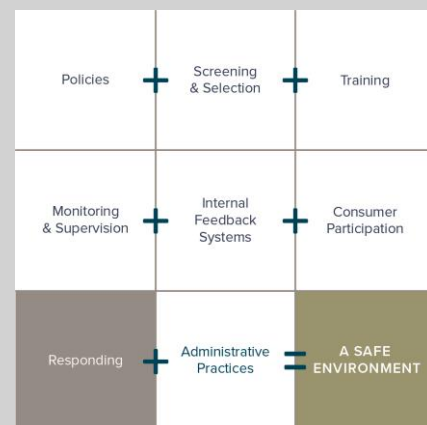
Best Practices:

Procedures for responding to red-flag behaviors and client-to-client incidents

Respond to tremors, not earthquakes

Treat "near misses" as free lessons

Don't respond in isolation

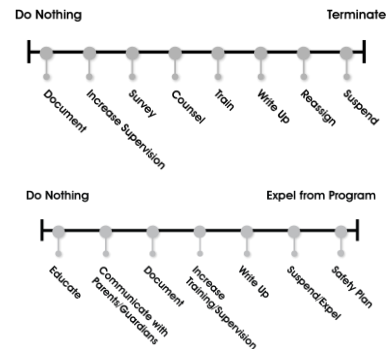


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Create Systems for Responding and Reporting

- ✓ Develop written response procedures
 - Red flag behaviors and policy violations
 - Suspicions or allegations of abuse
 - Client to client sexualized behaviors
- ✓ Use a continuum of responses
- ✓ Activate response procedures and initiate internal and external response communications



How to Respond if a Client Discloses Abuse or Neglect



Remember: It is never your responsibility to probe or investigate.

Always report the allegation up to your supervisor and **follow mandated reporting responsibilities.**

Administrative Practices

Administrative practices help set and enforce zero tolerance.

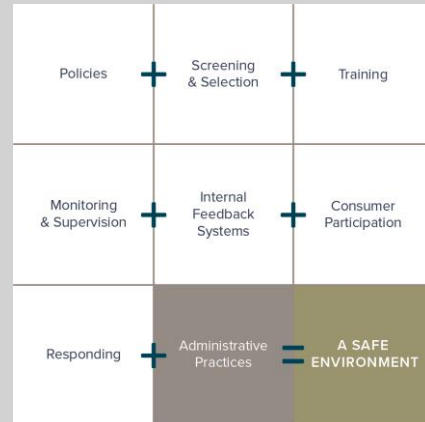
Best Practices:

Communicate commitment to safety

Develop system-wide safeguarding standards

Prevent drift from standards

Board involvement and leadership



Maintaining Safety in Virtually-Facilitated Programs

Understand Policies

Understand your organization's policies that specifically govern virtual programming and cover concepts such as:

- ✓ Moderators (who can control the group's online interactions)
- ✓ Rule of Three (eliminating or minimizing opportunities for one-on-one interactions between employees and clients online)

Follow existing policies that limit electronic communications and social media interactions between adults and clients in the following areas:

- ✓ Cell phones
- ✓ Email
- ✓ Texting
- ✓ Social networking sites



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Professionalism is Crucial

Maintaining professionalism helps reinforce existing boundaries between employees and clients. You can easily maintain professionalism by adhering to expectations set for in-person programming such as:

- ✓ Follow existing policies prohibiting electronic communication before or after a certain time
- ✓ Require employees and clients to dress appropriately during instruction time
- ✓ Ensure what clients see is appropriate: instruction or engagement from employee's home office or living room (not bedroom); blur background or have custom backdrop
- ✓ Conversations should be focused on learning and instruction, not the personal life of the staff or the program participant



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Monitor and Enforce Policies

Virtual supervision

- ✓ Spot check moderator controls
- ✓ Record online instruction or activity sessions
- ✓ Random supervised “drop-ins” to ongoing sessions

Require documentation of one-on-one interactions and periodically review for accuracy and details

Develop procedures for responding to inappropriate use of technology or electronic communications by employees or clients



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Educate Clients and Parents

Clients

Explain how the following items apply to virtual programming and engagement:

- ✓ Your organization’s policies on electronic communications
- ✓ Behavioral expectations
- ✓ Consequences of inappropriate interactions and cyberbullying
- ✓ Internal and external reporting information

Parent/Guardians

- ✓ Your organization’s policies governing virtual programming and electronic communications
- ✓ Practical online safety tips
- ✓ Internal and external reporting information



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Potential Red Flag Behaviors in Virtual Programs

- Staff singling out participants
- Staff logging in/accessing virtual platforms at odd times
- Using the program/platform to communicate privately after hours
- Staff asking to utilize private messaging
- Staff not following established policies/Code of Conduct
- Changes in dress code
- Changes in where or when they are having conversations
- Changes in background features
- Changes in behavior



Standards
are clear



Standards
are enforced



Everyone knows
safety is part of
their job



Everyone takes
warning signs
seriously



Everyone reports
their concerns

Reflection Questions

- ✔ Does our program have written policies that clearly define boundaries?
- ✔ Do our screening processes assess for abuse risk?
- ✔ Do we require all individuals working directly with clients to complete training that is preventative, not just reactive?
- ✔ Do we have defined methods for monitoring and supervising staff, volunteers, and clients?
- ✔ Do we have specific procedures for managing high-risk activities related to safeguarding?
- ✔ Do we have written procedures for responding to policy violations, suspected abuse, and client-to-client sexualized behaviors?



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KEEP IN TOUCH

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