



Peer-to-Peer Sexual Abuse – Risk Management Checklist

Last updated: January 23, 2024

The Risk is Real

All stakeholders need to understand that Peer-to-Peer Sexual Abuse is a real and growing challenge. Additionally, this challenge is not addressed by training and equipping administrative personnel, only. This challenge requires leadership to:

- (1) develop a prevention strategy that is tailored to organizational programming and facilities;
- (2) develop a response plan that includes reporting and communication to parents/guardians; and
- (3) train all levels of staff members to understand the risk and their respective roles in the prevention strategy and communication plan.

Philosophy of Services

It is important that all child-serving organizations start with the underlying philosophy that *participation is a privilege ... not a right*. A child's enrichment from camp can be jeopardized if the child is harmed. Child safety is primary; programming is secondary. If a particular child is aggressive (sexually, verbally, physically) in such a way that threatens a safe environment for others and cannot be redirected, the aggressive child has lost the *privilege of participation*. The organization should have a child removal plan for the sake of a safe and healthy environment.

Train Staff Members

Peer Sexual Abuse is a unique risk; ALL staff members need to complete training that includes specific Peer Sexual Abuse content. The Peer Sexual Abuse Training should define Peer Sexual Abuse, describe imbalances of power, provide examples of risk, outline methods to reduce risk, and address reporting processes (internally and to authorities). Staffing ratios are meaningless if staff members are not trained.

To Do:

- Identify and deploy an effective Peer-to-Peer Sexual Abuse Training.
Example: [AbusePreventionSystems.com/PeerSexualAbuse](https://www.abusepreventionsystems.com/peersexualabuse)
- Employ a record-keeping system to demonstrate ongoing training efforts.

Evaluate Facilities

Much of Peer Sexual Abuse risk can be mitigated through an intentional facilities review. A sexually aggressive child must be opportunistic, identifying locations where inappropriate behavior will be unobserved. Administration and staff members (after completing a Peer-to-Peer Sexual Abuse Training) should evaluate facilities to identify places where a sexually aggressive child would 'give it a go'. The facilities evaluation should be performed *before children are gathered for programming*. A plan should be created to remove or supervise all locations identified as higher risk.

One of the goals of supervision is to ensure that child interaction is observable. When evaluating buildings, rooms and activity space, Line of Sight is a key consideration. Consider using a map or layout of the facility with its various rooms and spaces intended for programming or activity, and create identifiable ‘supervision zones’; staff accordingly.

To Do:

- Obtain maps of *all* spaces accessible to children – dining halls, cabins, activities, outdoor areas, bathrooms, etc.
- Walk through each space to test for ease of visibility and blind spots.
- Remove all possible line-of-sight obstructions.
- Develop geographically-identified supervision ‘zones’.
- Identify areas of higher risk – Pay close attention to bathrooms, locker rooms, sleeping/changing areas.
- Create staffing minimums and ratios for each zone to accommodate programming AND supervision.
- Train staff members on the best places 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-on-one interaction. Be prepared to modify activities or programming to address evaluation findings.

To Do:

- Evaluate all program seating, games, and activities for opportunities for inappropriate touch to occur.
- Pay close attention to night and water activities.

Adequate Staffing

Each child-serving organization must be adequately staffed. Given the risk of Sexual Abuse and Peer Sexual Abuse, it is not enough to simply staff for activities and programming. The organization must have sufficient staff members to supervise children participating in activities such that all behavior between children is observable. As stated above, particular attention should be given to bathrooms, locker rooms/changing areas, water activities, night activities and ‘free time’. Planning should be in place to accommodate one or more children needing to leave a group activity (medical or bathroom) such that staff members are not alone with a child and staffing ratios are not jeopardized.

To Do:

- Ensure sufficient staffing according to 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 should an issue arise.

Redirection Plan

Staff members must receive training regarding imbalances of power and how expressions of power will unfold between children. Negative expressions of power must be redirected: bullying, manipulation, shaming, demeaning, etc. Be prepared to contact the parent/guardian for removal.

To Do:

- Include ‘case studies’ in training to recognize and redirect negative expressions of power.
- Create ongoing Redirection Plan training and establish expectations for staff members.

Removal Plan

It is important for every child-serving organization to have a Child Removal Plan in place before children are gathered for programming. Removal is an option if a child engages in abusive behavior (as described in the Peer Sexual Abuse Training) or refuses attempts of redirection related to harmful behavior toward another child (bullying, manipulation, shaming, demeaning).

To Do:

- Create a Child Removal Plan.
- Ensure the Child Removal Plan includes a parent communication component.
- Include ‘case studies’ in training to recognize and redirect negative expressions of power.
- Create ongoing Child Removal Plan training and establish expectations for staff members.

Internal Communication Plan

Each child-serving organization should create a clear internal communication plan that allows each staff member to clearly understand (1) what needs to be communicated; (2) to whom; (3) in what form; and (4) in what time frame. The internal communication framework should encourage communication about brewing imbalances of power, policy violations by other staff members, and other important information. Some information may also rise to the level of an external report to the appropriate authorities (i.e., forms of abuse or neglect) – see External Reporting Plan.

To Do:

- Create an Internal Communication Plan. This plan should include, but not be limited to, reporting structures, communication timelines and staff accountability.
- Create ongoing Internal Communication Plan training and expectations for staff members.

External Reporting Plan

Each child-serving organization should understand its state child abuse reporting laws and process. Consistent with relevant law and licensure, the organization should create an External Reporting Plan that outlines (1) who has the obligation/responsibility to report abuse/neglect; (2) how a report is to be made, when and to whom; and (3) the creation of pre-report and post-report documentation.

To Do:

- Create an External Reporting Plan.
- Create ongoing External Reporting Plan training for relevant staff members.

Registration Disclosure (optional)

The person in the best position to have knowledge regarding a child's propensity to engage in abusive or bullying behaviors is the parent/guardian – who is also the person typically engaged in the registration process for the child to attend the program. Consider adding a question or section in the registration process that specifically asks whether the child being registered (potential camper) has engaged in behavior that has been harmful to another child.

Example

I am unaware of any fact or circumstance of my child having physically or sexually abused another child. I am unaware of any fact or circumstance that would suggest that my child would physically or sexually abuse another child.

Parent Signature _____

Communication to Campers (optional)

An important measure to reduce the risk of Peer Sexual Abuse is clear communication to campers during a camp/cabin orientation about what IS and what IS NOT acceptable behavior during camp. Consider being specific regarding boundaries, forms of unacceptable touch, behavior in shared bathroom/shower space, in bunks/beds and more. This should be followed by a description of the communication process available to all campers to communicate matters that make them uncomfortable.

By clearly outlining impermissible behavior, the sexually aggressive child has been placed on notice about boundaries seriousness; correspondingly, the child who may be the object of bullying or abuse (or witnesses bullying or abuse) has received a clear outline of how to communicate forms of misconduct to camp leadership.

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 secular and ministry organizations that provide services to children, including camps, schools, churches, youth sport organizations, mentoring programs and non-profits.

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