MARYLAND GUIDELINES AND BEST PRACTICES FOR THE DESIGN, ASSESSMENT AND MODIFICATION OF PHYSICAL FACILITIES AND SPACES TO REDUCE OPPORTUNITIES FOR CHILD SEXUAL ABUSE



Developed Jointly by The Interagency Commission on School Construction and The Maryland State Council on Child Abuse and Neglect pursuant to MD Code Ann., Education, § 6-113.1(e)

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EXECUTIVE SUMMARY

In 2018 the Maryland General Assembly passed HB 1072 (<u>MD Code Ann., Education, § 6-113.1</u>) in order to prevent child sexual abuse and sexual misconduct by school employees *before it occurs*.

§ 6-113.1 defines sexual misconduct and child sexual abuse and requires schools to train all employees in the primary prevention of child sexual abuse, as well as develop policies and codes of conduct to prevent child sexual abuse and misconduct by employees. Additionally, it requires that:

- COUNTY SCHOOL BOARDS DEVELOP POLICIES AND PROCEDURES ON THE USE AND MODIFICATION OF PHYSICAL FACILITIES AND SPACES TO REDUCE OPPORTUNITIES FOR CHILD SEXUAL ABUSE.
- THE INTERAGENCY COMMITTEE ON SCHOOL CONSTRUCTION and THE STATE COUNCIL ON CHILD ABUSE AND NEGLECT JOINTLY DEVELOP GUIDELINES AND BEST PRACTICES FOR THE ASSESSMENT AND MODIFICATION OF PHYSICAL FACILITIES AND SPACES TO REDUCE OPPORTUNITIES FOR CHILD SEXUAL ABUSE;

After several meetings between the staff from IAC, MSDE- School Facilities Branch, staff and members of SCCAN, study of the literature, and consultation with experts in the field of child sexual abuse prevention and Crime Prevention Through Environmental Design (CPTED), the enclosed guidelines and best practices were identified.

It should be noted that each of the provisions of § 6-113.1 work together and not in isolation to create schools safe from child sexual abuse and misconduct, e.g., modifying physical facilities to provide windows in classroom doors must be supported by creating and enforcing policies and codes of conduct that prohibit covering up those windows and training that supports understanding and adherence to the policies and codes of conduct for the modifications to be effective.

INTRODUCTION

Creating safe and supportive school environments is necessary not only to help all students to learn and grow but to prevent child sexual abuse and the multiple forms of violence that disrupt learning and lead to social, emotional, physical, relational, academic, health, economic issues across the lifespan.ⁱ Investing in safe and supportive school environments also provides a safe, healthy, less stressful and more rewarding work environment and reduces teacher turnover rates.ⁱⁱ Additionally, since an incident of child sexual abuse associated with a school, or any organization, typically attracts media attention and a lawsuit, adherence to these guidelines and best practices, the other provisions of § 6-113.1, and careful employee screening processes ensures that schools are able to demonstrate that they have taken every step to protect the

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children in their care.

The Magnitude of Child Sexual Abuse & Sexual Misconduct in Schools

- Child sexual abuse is a preventable public health problem. Unfortunately the exact magnitude of the problem is unclear, as most school systems, including Maryland's, are not required to collect data on the incidence of child sexual abuse and misconduct by school employees. One review of existing studies found that rates of children experiencing misconduct ranged from 3.7% to 50.3%.ⁱⁱⁱ The most comprehensive study, with national data, found that^{iv}: 9.6 percent of students in grades 8 to 11 experienced contact and/or noncontact educator sexual misconduct during some point in their school career;
- 8.7 percent report only noncontact sexual misconduct and 6.7 percent experienced only contact misconduct. (These total to more than 9.6 percent because some students reported both types of misconduct.)

As child sexual abuse is correlated with higher levels of depression, guilt, shame, self-blame, eating disorders, somatic concerns, anxiety, dissociative patterns, repression, denial, sexual problems, relationship problems, physical health problems,^v and poorer academic achievement,^{vi} it is imperative that schools and other youth-serving organizations have policies and procedures in place to *prevent child sexual abuse before it occurs*. In addition to the human suffering of child sexual abuse, the economic cost is estimated to be more than \$280,000 per victim.^{vii} The estimated economic impact of child sexual abuse in the U.S. is \$9.8 billion.^{viii}

Student-on-student sexual abuse and assault is also a significant problem in schools, with roughly 17,000 official reports of sex assaults by students in the United States between 2011 and 2015.^{ix} While Title IX requires colleges and universities to report sexual violence annually, elementary and secondary schools are not required by national or state law to track and disclose such incidents. Unfortunately, due to this lack of tracking and disclosure of school employee and student-on-student sexual abuse and assault, the true extent of the problem is unclear.

This document will introduce several research-based guidelines and best practices: The Situational Prevention Approach (SPA)^x, Crime Prevention Through Environmental Design (CPTED)^{xi}, and Centers for Disease Control and Prevention Guidelines (CDC)^{xii}. Correctly applying such easily demonstrated strategies will enable schools to better protect their students.^{xiii}, ^{xii}

Resources on Best Practices and Guidelines for the Design and Modification of Physical Facilities to Prevent Child Sexual Abuse

The following are best practices and guidelines for the design and modification of physical facilities to prevent child sexual abuse in schools:

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- Centers for Disease Control and Prevention's (CDC) Recommended Policies and Procedures for <u>Preventing Child Sexual Abuse Within Youth-Serving Organizations</u>^{xiv} This document provides best practices, developed by a panel of experts and relevant literature, to help prevent child sexual abuse in youth-serving organizations, including schools. Key elements include:
 - VISIBILITY building or choosing spaces that are open and visible to multiple people to create an environment where individuals at risk for sexually abusive behaviors do not feel comfortable abusing
 - PRIVACY when toileting, showering, changing clothes
 - ACCESS CONTROL monitoring who is present at all times
- 2. Situational Prevention Approach For environmental design assessment. A number of Situational Approach Recommendations are considered best practices.^{xv} Those not specifically related to design and construction are included in Appendix A. For environmental design/school construction, the Four Step Safety Assessment Process is recommended, and discussed in detail in the recommendations. This process allows schools to identify and address risks for child sexual abuse, sexual assault, and sexual misconduct, as well as other risks to student safety that are inherent in the school environment.
- 3. Crime Prevention Through Environmental Design (CPTED)^{xvi} For designing, assessing, and modifying environmental facilities. CPTED is a well-established and well-researched field of crime prevention used throughout the world. It employs proven methods that increase the responsible, positive use of property while decreasing the likelihood of criminal behavior. CPTED principles incorporate strategies that take into consideration physical features, social activities, and people in order to encourage positive and discourage negative human behavior as people interact with their environment. Additionally, the Centers for Disease Control and Prevention (CDC) has recognized that communities applying CPTED principles report decreases in gun violence, youth homicide, disorderly conduct, and other violent crime, as well as positive impacts on residents' stress, community pride, and physical health.^{xvii}

The overarching goals for implementing CPTED principles is to design, retro-fit, and maintain the physical space in a way that:

- Empowers people to notice and intercept problems at an early stage; and,
- Discourages offenders from acting because they are more likely to be noticed and apprehended.

CPTED's four guiding principles of design are:

- NATURAL SURVEILLANCE maximizes observations and visibility of unacceptable behavior by the design and placement of physical features and persons. The goal is to both eliminate hiding or hard-to-see places and increase the ability of authorized adults to monitor and respond.
- ACCESS CONTROL uses real or perceived barriers and other features to orient and guide people and vehicles along appropriate paths and to restrict inappropriate access. The

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objectives are to increase comfort and decrease prohibited behaviors by providing safe routes and restricting unauthorized access.

- TERRITORIALITY –uses physical features to define space and to demonstrate a sense of ownership and pride. The goal is to convey that an area is not only owned and cared for, but that prohibited behavior will not be tolerated.
- MAINTENANCE (both physical and order) supports the first three design principles by ensuring the repair, replacement and general upkeep of the physical space and attention and response to minor inappropriate behaviors.^{xix}

Balancing School Design Efforts to Prevent Multiple Safety Threats

Given the increase in number of school shootings over the past several decades, there have been recent discussions about how to configure schools to maximize safety in the event of an active shooter situation. It is important to note that while school shootings generate significant media attention, active shooter events within school settings thankfully remain uncommon. The probability of being sexually abused is much higher.

It should also be noted that strategies and tactics intended to prevent school shootings and those intended to prevent child sexual abuse in schools should be complimentary. For instance, during lockdown procedures designed to be carried out swiftly, the school's interior windows, installed to enhance natural surveillance and discourage child sexual abuse, can be readily covered by blinds or shades, reducing visible targets for the active shooter. The use of electronic locks with card readers not only controls an unauthorized person's access to isolated areas, it also creates an audit trail to discourage staff from being isolated with a child. Surveillance cameras, primarily used to identify trespassers, vandals and intruders, can be equally effective at discouraging student-on-student sexual abuse by recording who enters and exits group restrooms and at what time.

The following operational strategies are useful for both preventing child sexual abuse and preventing or mitigating active shooter incidents and other emergencies when visual refuge is of higher importance.

- Documenting who comes and goes on facility property;
- Having a single point of entry for the public and controlling the use of all exits and secondary entries;
- Applying a visitor management system to identify registered sexual offenders attempting to enter;
- Ensuring all locations are monitored by staff, especially group restrooms;
- Clearly mark off-limits areas;
- Posting safety rules and regulations.
- Use of cameras and surveillance to deter or monitor youth-on-youth and youthstaff/volunteer interactions and to be able to track location of an armed intruder;

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- All doors that remain locked should have a vision panel or sidelight to permit natural surveillance into the room. These panels or sidelights should only be covered during a Hide-in-Place emergency.
 - Keep unused areas/rooms secured and locked;
 - Keep all areas well lit.

Additionally, minimum standards for encouraging a safe physical environment in schools can be overridden with technology or simpler design innovations during an emergency situation:

- Having windows or sidelights at doors to allow monitoring of youth-on-youth and youthstaff/volunteer interactions;
- Ensuring that meetings between staff and children are in unlocked rooms where they are
 visible to others via windows or sidelights at doors, but have a means to protect students
 and staff in case of an armed intruder entering the school (window coverings, locking
 system for emergency response, and policies and enforcement practices that prohibit the
 use of window coverings and locking systems except in emergency situations).

GUIDELINES FOR IMPLEMENTING BEST PRACTICES

Below are design review best practices that can be converted into a checklist for Capital Improvement Projects and a survey assessment for existing schools. Note that these best practices for the design of the school environment must be supported by the school policies and its employees' adherence to them. <u>This is particularly important when school policies, on one hand,</u> <u>require that interior glass areas be covered during a Hide-in-Place emergency but, on the other</u> <u>hand, policies require that the same glass areas remain visible during normal times</u>. For that reason, it is useful to publish and enforce clear protocols that deter a person from having unchallenged access, privacy and control over a child. For example:

- If any doors are to remain locked at all times, then vision panels or sidelights should be part of new building or renovation designs.
- Vision panel and sidelight should *not* be permanently covered with posters or decorations that make it difficult to observe activity in the room.
- Interior blinds should *not* be drawn except the brief period of a Hide-in-Place emergency.
- Supervisors should have a key or keycard to open and inspect any locked room that cannot be readily surveilled.

School systems should also collect comparable incident data (see Appendix B). on where and when abuse occurs and between what type parties (male/female, staff/student, visitor/student, etc.). Data collection is critical to the understanding of what is most important to address.

GENERAL STANDARDS

1. <u>The organization acknowledges child sexual abuse (adult-child and child-child) as an</u> <u>inherent threat.</u> GUIDELINES AND BEST PRACTICES FOR THE DESIGN, ASSESSMENT AND MODIFICATION OF PHYSICAL FACILITIES AND SPACES TO REDUCE OPPORTUNITIES FOR CHILD SEXUAL ABUSE Page 9 of 19

- 2. <u>The organization adopts recognized prevention strategies to address each type of threat.</u>
- 3. <u>The organization demonstrates its commitment to each prevention strategy.</u>
- 4. <u>The organization regularly evaluates the effectiveness of each prevention strategy.</u>

I. DEVELOP A CLEAR DESIGN PROCESS

Use the best practice Situational Prevention Approach **Four Step Safety Self-Assessment Process** to identify and respond to safety risks in the physical environment:

• STEP 1 - Brainstorming Safety Risks for specific Locations.

Staff, older students, and parents should be engaged in this process, and it should be specific for each location. Risks are brainstormed in seven key areas: high risk locations; characteristics of high-risk youth; facilitators; organization and community policies; lifestyle and routine activities; the larger community environment; and health, safety, and accident prevention (See Appendix B).

<u>STEP 2 – Developing Solutions for Each Identified Safety Risk</u>.
 For each identified risk, practical strategies should be implemented to eliminate or reduce the risk. Examples include limiting access to the front door that takes visitors past the receptionist and prevents entry by unknown visitors or requiring all visitors to sign in and wear a visitor badge.

- <u>STEP 3- Prioritization of Safety Risks to Address & Logistical Considerations</u>. This step is typically completed by the school leadership with consultation from higher level administrators since resources may be needed to implement particular safety solutions. Considerations for prioritization include how concerned the leadership is about the risk as well as costs and staffing issues associated with solutions.
- <u>STEP 4 Developing Solution Implementation Plans & Taking Action</u>.
 Schools are asked to work on resolving five risks at a time (i.e., three from their "Less Challenging" to solve list and two from the "More Challenging" list). A simple implementation plan is developed for each of the top five risks and the school administration guides the process of taking action to resolve each of these risks.

In the context of implementing these Guidelines on physical facilities and spaces it is especially important to consider *High Risk Locations*^{xx} which refer to specific rooms, hallways or spaces within or around the school setting. These locations may increase the chances of a safety incident due to a variety of reasons including a place's isolated nature (e.g., a remote baseball diamond), difficulty providing adequate supervision for this location (e.g., bathrooms, stairs, locker rooms) or even a place where the large number of other people present make supervision very difficult. High Risk Locations include any part of the school building or grounds as well as any setting that GUIDELINES AND BEST PRACTICES FOR THE DESIGN, ASSESSMENT AND MODIFICATION OF PHYSICAL FACILITIES AND SPACES TO REDUCE OPPORTUNITIES FOR CHILD SEXUAL ABUSE Page 10 of 19

participants travel to as part of their school involvement (e.g., field trips).

Additional best practices in the design process, include:

- Review the educational specifications and design documents with school resource officers and local police officials throughout the entire planning, design, and construction process to incorporate best practices for safety and security.
- Request that the design team include a specialist with CPTED training.
- Survey staff, students, and parents. This is an important part of this assessment, as students especially know the places they feel less safe.
- Follow the four design principles of <u>Crime Prevention through Environmental Design</u> (CPTED):
- Ensure the design process is connected to your training, policies, practices, and codes of conduct.

II. ASSESS CURRENT FACILITIES, SITES & CAPITAL PROJECT DESIGN USING CPTED PRINCIPLES TO FOCUS ON SUCH AREAS AS:*

SITE:

• Signs clearly establish the limitations on the use of building and grounds. Examples:

- Posting trespassing warnings at regular intervals along a fence line
- Signs limiting the use of parking areas and playgrounds during off-hours
- Signs directing all visitors to enter buildings through a designated entry
- Outdoor concealment areas are minimized.

Examples:

- Plantings and hedges are trimmed low and trees are trimmed high
- Dumpster enclosures are locked when not in use
- Door alcoves are fully lit
- Sidewalks and parking areas are made safe for pedestrians.

Examples:

- Shadows are eliminated for pedestrians
- Persons can be seen from 100 feet away at night
- Timers or photoelectric cells adjust outdoor lights to seasonal fluctuations
- Exterior gathering and play areas are made safe for children. Examples:
 - Gathering and play areas are clearly designated by fencing, signs, lines or lines
 - Visual obstructions to monitoring are removed or mitigated
 - Monitoring vantage points are identified for staff and volunteers
- Provide clear views around the exterior of the school, including parking lots, play and sports areas to facilitate supervision after hours and at night.

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- Eliminate potential hiding places created by landscaping and site walls near to the building. Solid walls should not be of a height that affords easy concealment. Consider using open fencing instead that allows supervision from either direction.
- Avoid deep recesses in the building form or open courtyards with limited views from the street.
- Provide a clear view of all parking lots and sports areas from one location to facilitate supervision.
- Provide a clear view of all play areas from one location to facilitate supervision during recess.
- Provide a separate enclosed outdoor play area for prekindergarten and kindergarten children.

EXTERIOR BUILDING SKIN:

• Roof access is controlled.

Examples:

- Exterior downspouts, columns and building features are modified to prevent climbing
- Large items adjacent to buildings, such as dumpsters or storage buildings are relocated
- Ladders and hatches leading to the room remain locked when not in use.
- Consider replacing or modifying existing doors and windows to withstanding an attempted forced entry. This might include strengthening the door or window, the frame, the locking mechanism and adding intrusion resistant security film to glass areas that could serve as entry points.
- Ensure that door hinges or hinge pins cannot be removed from the outside.
- Locate windows in exterior walls to increase natural surveillance in remote areas beside and behind the building.
- Consider tinting the glazing or installing exterior sunshade devices for windows that are critical for oversight of the exterior in order to reduce the need for blinds to block glare.
- Consider using interior solar shades that permit viewing the exterior but block views into the interior. On areas of the building that are less easily seen from the road, utilize exterior lighting on motion sensor so unauthorized activity in the area is more noticeable.
- Ensure all recessed secondary entry and exit doors are lighted to eliminate hiding areas.

BUILDING ENTRANCE:

- Exterior building entries and exits are control at all times. Examples:
 - There is a primary entry into a building for the general public
 - Visitors, vendors and contractors are identified and approved before entering a building
 - Building exits and secondary entries are controlled at all times by locks, alarms or direct supervision

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- Provide a single point of entry to the school that is clearly identified to persons approaching the building. Incorporate a controlled access system that routes all visitors for clearance from administrative reception area.
- Provide clearly seen signage to direct visitors to the school entry.
- Provide visual supervision of the main entrance from the main administrative office as well as the main lobby.
- Provide the school receptionist with the ability to remotely lock the main entry and to institute a lockdown with the touch of a button.
- Monitor the entry and exit points at all times if possible. If not possible, have clear policies and procedures for how to control who has access.
- Provide an area to post safety rules and regulations for all occupants and visitors to follow.
- Consider providing natural surveillance of secondary entry points to the school or grounds by locating a staff office or work space adjacent, to that entry area with visual oversight.

THROUGHOUT BUILDING:

- Interior building rooms remain locked when not in use. Examples:
 - Program areas, such as classrooms, media centers and gymnasia
 - Service areas such as kitchens, mechanical rooms and janitor closets
- Interior building blind spots and hiding areas are eliminated or mitigated. Examples:
 - Objects blocking supervision sightlines are removed or relocated
 - Monitoring vantage points are identified for staff and volunteers
 - Rooms for instruction or activities can be monitored from outside the room
 - Restrooms and dressing rooms are designed or modified to facilitate frequent monitoring by staff
 - Room lighting is controlled to prevent hiding in unoccupied rooms
 - Surveillance cameras, sensors and other security technology support the supervision of remote areas, such as stairwells and corridors
- Provide the ability to close off sections of the building to control access after school hours.
- Design circulation and congregation spaces so that they are open and visible to multiple people. Maintain clear lines of sight as much as possible, e.g. minimize "blind corners" and "blind spots" where behaviors cannot be observed.
- All areas of a classroom or teaching space should be easily visible to staff from any point in the room. Avoid designing classrooms with nooks, alcoves or long entry halls that are hard to monitor and supervise from other parts of the room, especially for the younger grades. Use convex safety mirrors if needed to ensure visibility.
- Provide vision panels or sidelights, positioned and sized to permit a complete view into offices, classrooms, meeting rooms, and other rooms that may be occupied by more than one person.
- Consider providing vision panels on all cross-corridor and stair doors to ease monitoring the facility after hours.
- Install lockable partitions or cages to prevent top and bottom stair landings from becoming hiding

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areas.

- Provide motion-activated, day/night cameras in stairwells to cover the entire length of the path, with no dead spots.
- Provide signage to clearly identify areas that are off-limits or can only be used with adult/staff supervision.
- Utilize strict key or keycard control to limit access to the most remote locations, such as roofs, attics and mechanical rooms or consider installing a motion-activated camera to document the use of the door.

TOILET ROOMS:

- Establish separate bathrooms for adults and children/youth. Prohibit adults from using a bathroom at the same time as children/youth, and clearly post rules.
- To prevent adults from sharing the group toilet rooms with students, consider providing a toilet room for staff or visitors in the main lobby near the major public spaces that can also be accessed during after-hours school use.
- Address potential contact between young children and older youth who are using bathroom facilities at the same time, paying special attention to circumstances where they may be a significant age differential between them.
- Entrances to boys' and girls' toilet rooms should be designed in such a way as to allow visual supervision by staff from the corridor.
- Screen the urinal area in the boys' toilet room from direct views from the corridor.
- Post rules inside the restrooms to reinforce acceptable, unacceptable and prohibited behaviors.
- Secure windows to prevent unauthorized entry from the outside.
- Consider zoning access within large group restrooms to promote rapid turnover and reduce loitering
- If multiple restrooms are on the same floor, consider temporarily locking access to those restrooms that are the most isolated and least frequented areas.
- Install a motion-activated, security camera to monitor the entry into group restrooms.

LOCKER ROOMS:

- Make Locker Rooms easy to find and identify with colors, signs and displays
- Clearly distinguish male, female and gender-neutral entries
- Distinguish between common areas and off-limit areas with signs and colors.
- Post rules to reinforce appropriate, inappropriate and prohibited behavior.
- Organize the locker room for easy surveillance, particularly gathering areas and possible areas of isolation. Avoid dead-end spaces that can be used for entrapment. Consider limiting the lockers in the middle of the space to only 4' tall.
- The PE instructor's office should be located near the main entry and exit of the locker room and provided with glazing to monitor the locker area.
- Block access to areas that are difficult to supervise.
- Use tamper-resistant locks to prevent easy access to off-limit areas
- Install a motion-activated security camera to monitor the entry into locker rooms.

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HEALTH SUITE:

- For better supervision of the health suite, provide glazing in the walls and door of the health professional's office to allow full views of the waiting, treatment and rest areas, including when the door is closed for acoustical privacy.
- Separate rest areas for male and female students are recommended at the secondary school level. Consider providing a wall between the rest areas for male and female students.
- The rest area should not be completely enclosed and self-contained as it cannot be easily monitored, both visually and acoustically. Consider the use of privacy curtains and partial walls that do not block views from the nurse's workstation.

*NOTE THAT ITEMS IN BOLD ARE CONSIDERED MINIMUM STANDARDS^{xxi}

III. MONITOR, EVALUATE, & REVISE THE PLAN

Monitoring and evaluation are critical components of the public health approach to prevention of child sexual abuse and misconduct. Schools must collect timely and reliable data to monitor the extent of the problem and to evaluate the impact of prevention efforts. Planning, implementation, and assessment to prevent sexual abuse and misconduct in schools all rely on accurate measurement of the problem.^{xxii}

In order to measure whether implementation of best practices in designing and retro-fitting the physical environment result in desired outcomes (i.e., reducing incidents of child sexual abuse and misconduct), it is critical that schools collect and report standard de-identified incidence data. Collection of incidence data on other negative behaviors like sexual assault, bullying, vandalism, and gang violence may reveal additional gains from implementation of improved design of physical spaces. Evaluating data, produced through program implementation and monitoring, is essential to providing information on risk and protective factors and what does and does not work to reduce child sexual abuse, sexual assault and sexual misconduct rates. Collecting de-identified data is critical to understanding and prioritizing which problems are most

important to address.

A checklist for tracking specific incidents is included in Appendix B. On an annual basis, schools should analyze the data and make called for adjustments to physical space, policies and practices.

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APPENDIX A: SITUATIONAL PREVENTION APPROACH

The following Situational Approach Recommendations are considered best practices:

- School develops a clear statement about the need to set and maintain professional relationships with children;
- School personnel delineates the line between ethical or appropriate behavior from unethical/inappropriate behavior across specific situations;
- School specifically prohibits certain behaviors that constitute child sexual abuse/misconduct;
- School identifies and addresses higher risk situations/locations for child sexual abuse/misconduct;
- The school's code of conduct and trainings regarding child sexual abuse/misconduct prevention apply to everyone in the organization, including administrative leadership, teachers, staff, and volunteers.
- Skills for prevention of child sexual abuse/misconduct are developed through trainings for all school staff and volunteers prior to the beginning of the school year, and trainings address the following:
 - 1. Knowledge about how to prevent and respond to child sexual abuse;
 - 2. Self-awareness that child sexual abuse can result from escalating boundary violations;
 - 3. Skills to keep children safe;
 - 4. Education to prevent, recognize, and report child sexual abuse;

Four Step Safety Self-Assessment Process^{xxiii}

Applying the Situational Prevention Approach's (SPA) Four Step Safety Self-Assessment Process to school settings provides a process by which schools can *identify and address risks for child sexual abuse, sexual assault, sexual misconduct, as well as other risks to student safety that are inherent in the school environment.* According to Dr. Keith Kauffmann, PhD, a leading expert in preventing child sexual abuse in youth-serving organizations, the SPA process allows for brainstorming of safety risks, creating a prevention or a risk-reduction solution for each identified risk, prioritizing the order of risks to be addressed, and creating a brief implementation plan to guide taking effective action to resolve identified risks. The Four Step Safety Self-Assessment Process, fleshed out in the specific guidelines below, include:

- STEP 1 Brainstorming Safety Risks for specific Locations.
- STEP 2 Developing Solutions for Each Identified Safety Risk.
- STEP 3 Prioritization of Safety Risks to Address & Logistical Considerations.
- <u>STEP 4 Developing Solution Implementation Plans & Taking Action</u>.

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APPENDIX B: CHECKLIST FOR TRACKING SPECIFIC INCIDENTS

Based on variables collected by the <u>National Child Abuse and Neglect Data System (NCANDS</u>)^{xxiv}, evidencebased child sexual abuse prevention programs^{xxv}, and the Responsible Behavior with Younger Children Survey^{xxvi}; variables identified in *A Standard of Care for the Prevention of Sexual Misconduct by School Employees^{xxvii}*; and variables identified through consultation with researchers and practitioners in the field^{xxviii}, the Maryland State Council on Child Abuse and Neglect (SCCAN) recommends that instances of child sexual abuse and sexual misconduct, as well as student-on-student sexual abuse or assault be tracked and recorded within the following data elements:

- Did the alleged incident include:
 - o sexual comments, jokes, gestures, or looks?
 - showed, gave or left sexual pictures, photographs, messages or notes to victim?
 - sexual messages or graffiti about victim on bathroom walls, in locker rooms, or other places?
 - Spread sexual rumors?
 - Unwanted touching?
 - o Kissing?
 - Touching the victim's private parts?
 - Having the victim touch the perpetrators private parts?
 - o Oral sex?
 - o Intercourse?
 - o Sodomy?
 - Date of Incident
- Date Incident reported to School Authorities
- Who reported/disclosed to school administration?
 - o Student,
 - o Teacher,
 - o Administrator,
 - o Other staff,
 - o Parent,
 - o Volunteer
- Who reported to CPS and/or Law Enforcement?
- Age of Victim
- Gender of Victim
- Race of Victim
- Ethnicity of Victim
- Victim disability
- Age of Perpetrator
- Gender of Perpetrator
- Race of Perpetrator
- Ethnicity of Perpetrator
- Role of Perpetrator within School (administrator, teacher, cafeteria worker, bus driver, parent, volunteer, student etc.)
- Was there a witness/es?
- Age of Witness/es
- Gender of Witness/es
- Race of Witness/es

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- Ethnicity of Witness/es
- Role of Witness/es within the School
- Time Period:
 - o Before school
 - o After school
 - o Planning period
 - o Lunch
 - o Field trip
 - o Overnight trip
 - o Other
- Location:
 - On or off school property?
 - o Main building
 - o Portable building
 - o Playground
 - o Sporting facility
 - o Classroom
 - o Office,
 - o Closet,
 - o Hallway,
 - o Stairwell,
 - o Restroom,
 - o Playground,
 - o Gym,
 - o Locker room,
 - o Cafeteria,
 - o Auditorium,
 - o Theater dressing rooms,
 - o Backstage,
 - Outside space
 - o Bus
 - o Private vehicle
 - o Other
- Method/s of obscuring sight lines:
 - o Door closed
 - $\circ \quad \text{Door locked}$
 - o Window/s obscured
 - o Furniture (desks, bookcases, etc.) used to obstruct view
- Date Incident was Addressed:
- Manner of Handling Incident:
- Disciplinary Action for Incident:
- Which policies violated?
- Which tenet of the Code of Conduct was violated?
- Were drugs or alcohol involved in the incident?

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^{ix} "AP Investigation Reveals Hidden Horror of Sex Assaults by K-12 Students"

https://www.edweek.org/ew/articles/2017/05/01/ap-reveals-hidden-horror-of-sex ap.html

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^{xi} Lawrence Fennelly, Timothy Crowe, M.S., <u>Crime Prevention Through Environmental Design</u>, 3rd Edition, July 2013 and Centers for Disease Control and Prevention. Crime Prevention Through Environmental Design (CPTED) School Assessment (CSA). Atlanta, GA: National Center for Injury Prevention and Control, Centers for Disease Control and Prevention, and Carter & Carter Associates, 2017.

^{xii} Saul J, Audage NC. Preventing Child Sexual Abuse Within Youth-serving Organizations: Getting Started on Policies and Procedures. Atlanta (GA): Centers for Disease Control and Prevention, National Center for Injury Prevention and Control; 2007.

^{xiii} Key information interview, <u>R. Leslie Nichols, MSSA, CPP</u>,October 16, 2018.

^{xiv} Saul J, et,al.,2007.

^{xv} Kaufman K, 2015.

^{xvi} Lawrence Fennelly, Timothy Crowe, M.S., <u>Crime Prevention Through Environmental Design</u>, 3rd Edition, July 2013, p. 3.

^{xvii} Centers for Disease Control and Prevention. Crime Prevention Through Environmental Design (CPTED) School Assessment (CSA). Atlanta, GA: National Center for Injury Prevention and Control, Centers for Disease Control and Prevention, and Carter & Carter Associates, 2017.

^{xviii} Using Environmental Design to Prevent School Violence,

https://www.cdc.gov/violenceprevention/youthviolence/cpted.html

^{xix} Centers for Disease Control and Prevention. Crime Prevention Through Environmental Design (CPTED) School Assessment (CSA). Atlanta, GA: National Center for Injury Prevention and Control, Centers for Disease Control and Prevention, and Carter & Carter Associates, 2017.

^{xx} High Risk Locations include, among others, stairwells, bathrooms, storage rooms, gym (when empty),sports equipment rooms, baseball dugouts, back seats of vehicles, woods around the building, unused, unlocked rooms, area behind vending machines,, unlit areas, unlit facility exterior areas.

^{xxi} Key information interview, <u>R. Leslie Nichols, MSSA, CPP</u>,October 16, 2018 and October 8, 2019.

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^{xxiv} National Child Abuse and Neglect Data System (NCANDS), Childfile Codebook, September 2015. <u>https://www.ndacan.acf.hhs.gov/datasets/dataset-details.cfm?ID=178</u>

^{xxx} Shifting Boundaries: Lessons on Relationships for Students in Middle School, Nan D. Stein, Ed.D. with Kelly Mennemeier, Natalie Russ, and Bruce Taylor, Ph.D. December 2010.

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^{xxvii} Charol Shakeshaft, Rebecca L. Smith, Steven Tucker Keener & Emma Shakeshaft (2019) A Standard of Care for the Prevention of Sexual Misconduct by School Employees, Journal of Child Sexual Abuse, 28:1, 105-124, DOI: <u>10.1080/10538712.2018.1477219</u>

^{xxviii} Elizabeth Letourneau, PhD, Rebecca Fix, PhD, The Moore Center for the Prevention of Child Sexual Abuse, Johns Hopkins Bloomberg School of Public Health; Charol Shakeshaft, PhD, Virginia Commonwealth University; <u>R.</u> Leslie Nichols, MSSA, CPP.