Preventing Abuse in Jewish Organizations that Serve Youth: Ten Policies to Create Safer Environments

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It is critical for leaders of youth-serving organizations (YSOs) (e.g. shuls, schools, camps, mentoring programs, etc.) to adopt child-protection policies proactively, before they are faced with a problem. Policies clarify acceptable and unacceptable behaviors that guide individuals to model safe interactions with children. When a policy is well communicated, it becomes integral to institutional culture and its violations are easily identifiable, making it possible for bystanders to intervene and institutions to respond. Without policies, leaders may forget or dismiss important response steps, become more susceptible to pressure, and introduce their organizations to increased liability.] Having a policy provides organizations with a plan to act on before a situation escalates. Finally, a good policy can function as a deterrent, sending a clear message to potential abusers: Abuse is not tolerated here and will be reported immediately.

The following are recommendations for inclusion in an organization's policy. This list is meant as a starting point for conversation, and is not exhaustive. Organizations should **consult with child protection experts** when considering these suggestions, as guidelines that reduce risk in one organization or setting may increase risk in another.

1. **Screen prospective employees and/or volunteers**.
Individuals who abuse children do not end up in YSOs by accident; they work hard to get there. YSOs provide easy access to children and give a respectable cover to perpetrators. However, many YSOs do not screen prospective hires and volunteers – or do so only minimally. When possible, screenings should include a criminal background check; a check of the state's central registry for perpetrators of child abuse and neglect; Internet/social media searches of an individual's names, nicknames, screen names, and email addresses; an interview; and reference checks. An organization's policy developers should consider instituting screening measures for employees and volunteers; lay leaders; subcontractors (e.g., bus drivers, catering staff, course instructors); hosts with- in or without the community (e.g., *shabbaton* hosts); visitors who request *Shabbos* hospitality; and others who have repeated interactions with children (e.g., "candy men") or hold the keys to communal spaces (e.g., *mikva* attendants). Not all screening measures are appropriate or practical for all individuals, but organizations should try to anticipate the various categories of individuals who will come in contact with children and determine which screening mechanisms to employ.

2. **Maximize visibility**.
Most individuals who abuse children are known or trusted by their victims, the victims' families, and the community at large. Like anyone seeking to commit a harmful act, these individuals will often look for private opportunities to perpetrate their crimes. One way to protect children from abuse is to maximize visibility when designing or renovating a building;

it is preferable to opt for open layouts, glass walls, well-lit spaces, and windows in all doors. Once a building is in operation, unused spaces should be locked and frequently used spaces should be supervised. Caregivers, who would not allow their children to wander unattended around malls or public parks, should likewise not allow them to roam unattended in communal spaces full of familiar faces (e.g., *shul* bathrooms, *simcha* halls, and empty classrooms). Finally, policies should require the presence of at least two adults at all youth programs or meetings. When this is not possible, policies should follow *yichud* principles and require that all activities be observable and interruptible. Adults should never meet one-on-one with a child in a closed environment. In addition, YSOs can extend open invitations to caregivers to attend programs or meetings. These invitations function as more than just a considerate accommodation; they set the tone for a safe and transparent organization and reassure caregivers that the organization is serious about limiting opportunities for child abuse.

3. **Know all participants**.
It is the YSO's responsibility to know where all children are during an event, which is difficult if attendance is unclear. Unfortunately, many *shuls* do not require youth registration, and staff may not even know the names of participating children. If a child were ill or injured, for example, precious time would be wasted trying to find the caregivers or obtaining important medical information. Moreover, if a child were to wander off or be picked up by an undesignated person, identifying or even noticing the missing child would be difficult. Even though *halacha* prohibits writing on *Shabbos* and *chagim*, other creative ways to take attendance can be developed.

4. **Plan for dismissals**.
Dismissal from youth events can be crowded and chaotic, especially in large organizations. Without protocols to guide the process, staff may be required to make split-second judgments that may be inaccurate or unsafe. Allowing someone other than the designated caregiver to pick up a child can lead to confusion – or even panic when the caregiver comes to retrieve the child and the child isn't there. More seriously, it allows for the possibility that a community member or family member seeking to abuse a child may pick up the child by claiming to be doing the caregiver a favor. It also permits a stranger to pretend to be a friend or relative to gain access to a child for abusive purposes. YSOs should prohibit the release of a child to anyone other than the designated caregiver without express permission in advance.

5. **Define interaction boundaries**.
Individuals who abuse children often commence the abuse with inappropriate touching in order to test the tolerance of those around them. These interactions may begin by creating opportunities for seemingly routine or 'accidental' touch, or by being overly physical with a child. If the touching behaviors go unnoticed by bystanders or by the child, the perpetrator may feel emboldened to push the boundaries further. To help bystanders halt inappropriate touching, the YSO must define appropriate and inappropriate touch. At the most basic level,

touch of a child that is unwanted or intended to gratify the physical desires of the abuser should never be permitted. Touch that violates social or *halachic* norms for a particular community, or touch that has the appearance of abusive touch, is problematic as well. Beyond this, YSOs and their advisors must decide where to draw the line on touching; their policies should include examples of both acceptable (e.g., holding young children's hands) and unacceptable (e.g., wrestling) forms of touch. Formalizing these limits provides staff and children with clear boundaries, enhances adult-child relationships by encouraging safe touch, minimizes opportunities for abuse, and makes instances of inappropriate touching immediately identifiable. YSOs should also develop policies regarding communication with youth, including whether and how adults can phone, text, email, or use social media to contact a child, and prohibiting the use of inappropriate jokes, innuendo, behaviors, or comments about bodies to and around children.

6. **Maintain policies off-premises**.
Policies developed for the YSO must also apply off-premises. When generating a list of outside activities or events that might reasonably occur during the year, the YSO should contemplate those extra precautions. Situations to consider include transportation to or from events, overnights and *shabbatonim*; staff or volunteers offering to babysit; tutoring or *bar/bat mitzvah* lessons; taking one child or a small group of children on a special trip or for a treat; and hosting events at a community or staff member's home (e.g., an *Oneg Shabbos* or Purim *seudah*).

7. **Institute safety precautions in *mikvaot***.
Boys are usually welcome during men's hours at community *mikvas*. Inherently, any situation in which individuals, particularly adults and children are naked together presents a risk to children's safety, and the *mikva*, despite its holy purpose, is no exception. *Mikva* policies might include limiting use of the *mikva* to one person at a time, prohibiting nudity outside changing rooms and the *mikva* itself, requiring children to be accompanied by a responsible adult at all times in the *mikva* building, having a previously screened and trained volunteer on site whenever the *mikva* is in use.

8. **Emphasize training**.
Training is a key component in shaping child-protection attitudes and behaviors in the community. Even the most comprehensive policy cannot protect children without accompanying training. The best training package will include education for all members of the community. Children should be taught anatomically correct terms for their bodies, which areas on their bodies are private, comfort with politely demanding respect for their own personal space, and permission to disobey an adult if ordered to break the rules or keep a secret from their caregiver(s). In addition, children should be able to identify five adults whom they would trust with a concern or problem and be taught to seek help from them if someone acts in a way that makes them feel confused or uncomfortable. Of course, even trained children should never be expected to protect themselves from abuse. Staff, volunteers, and adult constituents should be well versed in the terms of the organization's

policy, educated about abuse, trained to model safe behavior, taught to recognize indicators and precursors of abuse (e.g., grooming behaviors), and required to report all suspicions or knowledge of abuse.

9. **Develop protocols for responding**.
No matter how committed a community is to protecting its children, when faced with an instance of ongoing or historic abuse by an individual who is trusted, loved, or simply known, leaders may freeze, enter a state of disbelief, and, even with the best of intentions, become muddled. This is when having a policy becomes absolutely critical. If the institution has thought through these issues calmly in advance, its leaders should be expected to follow the policy; if they do not, the community can insist on it. Policies about responding to abuse should address supporting the victim; preventing further abuse of the same victim or others; reporting the abuse to the authorities and not trying to handle the matter internally; retaining an outside expert; determining what access, if any, the perpetrator may continue to have to the institution and children; and alerting the community. Policies must also address instances of behavior that are not known to be abusive but do violate the protocols or are otherwise concerning. Because one rarely catches an individual abusing a child and children often do not disclose their abuse, these behaviors might be the only indicators of wrongdoing. Therefore, policies must also address responses to these situations, such as bringing in an outside expert to advise, conducting a risk assessment, or launching an investigation; and determining what, if any, limitations should be placed on an individual's access to the institution and children.

10. **Protect from known risks**.
Under a variety of circumstances, an individual known to pose a risk to children may be found in a community. These include an individual who was previously convicted of abusing a child; an accused individual who was not convicted, perhaps due to a technicality (e.g., the statute of limitations had run); a person against whom unresolved allegations are pending (e.g., an investigation or trial is under way); or an individual who has engaged in concerning behaviors but has not (yet) been accused of abusing a child. A YSO is not a court of law, and no standard evidentiary requirement must be met before an institution can take precautionary actions to protect children. The policy should aid leaders in determining how much, if any, access such individuals are granted to the institution and the children within it. The policy should address how and when to enlist an outside expert, meet with law enforcement, develop a safe-engagement plan or limited access agreement (e.g., a *shomer* who accompanies the person to the *shul*), bar the individual completely from any sort of participation, alert the community to the individual's status, and support the individual's efforts to prevent a relapse.

Conclusion
Whatever an institution's policy is, it must be readily accessible and communicated to the entire organization, and policy violations should meet with clear, predetermined consequences. An individual, who is aware of the policy, yet is seemingly unable to abide by

its terms, should be a cause for concern, subject to dismissal, and trigger an institutional response.

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