



Policy for the Protection of Children & Youth

Version 3/1/2013

Right to Life of Northeast Ohio
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www.RightToLifeofNortheastOhio.com

This “Policy for the Protection of Children and Youth” is set forth by *Right to Life of Northeast Ohio*, of which *Life Education Fund* and *Youth for Life of Northeast Ohio* are a part of. Any references in this document to *Right to Life of Northeast Ohio* includes both *Life Education Fund* and *Youth for Life of Northeast Ohio*.

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Child and Youth Protection Policy

I. Definitions

A. “Child” and “Youth” and “Adult”

Following the public school system, a “child” is anyone age of 11 or under. A “youth” is anyone not a “child” and under the age of 18. An adult is anyone 18 years of age or older and has finished high school.

B. “Paid Staff Person,” “Adult Volunteer,” and “Screened Adult”

A **Paid Staff Person** is someone paid by Right to Life of Northeast Ohio (RTLNEO). An **Adult Volunteer** is someone who has not been screened. They can work in a room with a Screened Adult or paid staff person. A **Screened Adult** is a volunteer who has gone through the entire screening process, including background check.

C. Youth Helpers – Youth below the age of 18 years assisting with child or youth activities. They can assist with activities but should not be considered an adult volunteer and should be supervised themselves.

D. “Child/Youth Abuse” For purposes of this Policy, **child/youth abuse** includes any of the following:

1. **Physical Abuse:**

Violent non-accidental contact which results in injury. This includes, but is not limited to, striking, biting, or shaking. Injuries include bruises, fractures, cuts, and burns.

2. **Sexual Abuse:**

Any form of sexual activity with a child/youth in any setting, whether verbal or physical. The abuser may be an adult, an adolescent, or another minor.

3. **Emotional Abuse:**

A pattern of intentional conduct which crushes a child’s/youth’s spirit, attacks his/her self-worth through rejection, threats, terrorizing, isolating, or belittling.

II. Screening and Selection of Adult Volunteers

A. Adult volunteers who regularly work with children and youth and paid staff persons will be screened. Those who work regularly with children/youth will be trained on child protection issues prior to beginning their regular involvement with children and youth. The procedures for screening are as follows: Each person being considered to work regularly with children and/or youth, whether as a volunteer or paid staff person, shall fill out an application form. This screening is good for 5 years after which time a re-screening will be necessary.

B. Before placing the applicant in a position of responsibility with children or youth, a designated paid staff member, board member or other person charged with specific responsibility should interview the applicant, reviewing with them the written application.

C. The person conducting this interview should contact the references provided on the application form and any additional persons as the circumstances dictate. A written record of such contacts will be retained with the application form.

D. Each person applying to volunteer with children and/or youth shall “authorize” RTLNEO to conduct a criminal background check. You must get written authorization to run a background screening.

- E. Before beginning work with either children or youth, each paid staff member and volunteer will sign a statement that they have read, understood, and agree to abide by this Child and Youth Protection Policy.
- F. After the interview and background check have been accomplished, the decision will be made by the executive director and/or board to accept or reject the applicant as volunteer who will work with youth and/or children.
- G. Where it has been determined that an applicant should **not** work with children or youth, those persons involved with the decision should handle it in a sensitive manner. The appointed person should inform the applicant in person. The specific reasons for the decision should be given, whenever possible.
- H. It is important that all records be kept locked in the appointed person's office or other secure area designated by the RTLNEO board. There should be a system in place that gives those who need these records easy access and a safe place to be stored when they are not needed.
- I. Although not required to personally accomplish the above tasks, the appointed persons shall be responsible for ensuring compliance with sub-paragraphs (A) through (H) above.

III. Ongoing Education of Persons Who Work With Children and Youth

The RTLNEO board shall ensure that regularly scheduled (i.e., at least annually) training focused on current issues of child protection is available to and received by those working with children and youth. Attendance at this training shall be required of all paid staff members, screened and non-screened adult volunteers who work consistently with children and/or youth. The training should include:

- A. The definition and recognition of child abuse.
- B. RTLNEO policy and procedures on child abuse and the reasons for having them.
- C. The need to maintain a positive environment, including appropriate discipline and age-level characteristics.
- D. The appropriate behavior for volunteers and leaders of child/youth events.
- E. Abuse reporting responsibilities and procedures.
- F. Definition of appropriate interpersonal boundaries.

IV. Supervision of Children and Youth

A. General Rules

- a. All activities involving children and youth will be supervised by at least one screened adult.
- b. When reasonably feasible, each room set aside for children/youth should have a door with a window. Windows in doors tend to remove the opportunities for secrecy and isolation, conditions every child abuser seeks.
- c. The "Two Person Rule" is defined as having at least two people in any enclosed setting, one of which should be a screened adult volunteer or staff person.

B. Open Door Policy Parents, volunteers or staff will be permitted, as reasonableness dictates,

to visit and observe all programs and activities at any time.

- C. Supervision of Activities** At least two screened adults will be present for all program activities involving children and/or youth. Any meetings held in an individual's home will be supervised by at least two adults who are not members of the same family. Meetings held in an individual's home must be pre-approved by the child's/youth's parent or guardian.
- D. Counseling of Youth and Children** In instances of youth or child counseling where circumstances dictate that counseling would be most effective on a one-on-one basis, an appropriate screened volunteer may meet individually with a youth with the knowledge of at least one other adult volunteer. At any counseling session with children or youth, the door of the room used should remain open for the entire session, unless there is glass in the door or wall which gives a clear view into the room. If another adult is not in the building when the counseling occurs, the session should be moved to in a public place, such as a restaurant or outside where other people are present.
- E. Time Following Group Events** Following child/youth group events, it is inevitable that occasionally a child's/youth's transportation arrive after all other participants have departed. In those circumstances, a child/youth may unavoidably be supervised by one screened adult. Under these circumstances, the general rule requiring the presence of two screened adults is suspended and the screened adult is responsible for exercising his/her best judgment for the participant's well-being.

V. Transportation

A. General Rules Transporting children and youth is an important concern. Their safety can be at risk in a variety of ways. Therefore, certain discretion must be used depending upon the event attended, the locale of the event, and the age group participating. This Policy includes both requirements and guidelines. When feasible, there should be adherence to the recommendations in the guidelines. It is expected that the requirements will always be followed.

B. Requirements

- a. Drivers must be known to the designated adult leader of the event.
- b. When a child/youth is transported in any vehicle, the driver must be either the child's/youth's parent/guardian, or a screened adult or a paid staff person who is at least 18 years old.
- c. Drivers must have a valid driver's license for the vehicle being operated. Drivers must require that seat belts be used at all times and the number of passengers must not exceed the number of seat belts.
- d. Drivers should be advised of a designated route and should not deviate from it except in cases of emergency or road detours.
- e. Drivers should not use cell phones unless required for communication with other drivers and should not text message while driving.
- f. When there is reason to believe it would not be safe for a youth to ride in a vehicle driven by another youth, the adults responsible should intervene and take reasonable steps to make alternative arrangements for all concerned.

C. Guidelines

- a. Drivers should be accompanied by at least one other adult.
- b. Youth who drive their own vehicles should be reminded regularly of the importance of vehicle safety.

VI. Trip and Retreat Supervision

Trip and retreat settings can call for different child/youth protection requirements depending on the circumstances. What follows are requirements and guidelines of this policy. The requirements should always be implemented. Depending on the circumstances of the setting, who is in attendance, etc., some or all of the guidelines should be implemented. Those in charge of the trip or retreat should be mindful of both requirements and guidelines, in addition to applying their own wisdom to the needs of a given occasion.

A. Requirements

- a. There will be at least two **screened** adults present for all trips, retreats and other events where the children and/or youth gather overnight.
- b. There will be at least one **screened** adult for each gender present at co-ed overnight events. At single gender overnight events, at least one of the two screened adults present shall be of the same gender as the child/youth.
- c. The person in charge of youth/children for each overnight trip and/or retreat shall carry parental permission slips including permission for emergency medical care.

B. Guidelines In a hotel type setting, rooms should be assigned as follows:

- a. Separate rooms for adults and child/youth should be assigned with at least two children/youth per room.
- b. Assignments should be made so that an adult room is between two children/ youth rooms.
- c. Adults should make random monitoring hall trips and room checks at night by two adults of the same gender as those being checked.
- d. A hotel should be selected where the rooms open to the interior of the building (i.e., do not open to the outside).

VII. On-line Safety

It is acknowledged that the use of computers and other electronic means of communications may be useful tools in supporting child and youth activities. However, it should also be recognized that these forms of communication also potentially pose a unique risk.

- A. Computers that are set up for guests or program participants to access the internet should be in high-traffic places and randomly monitored by staff. Controls should be in place to prevent access to inappropriate content.

VIII. Responding to Allegations of Child Abuse

- A. Immediately, yet with dignity and respect for the worth of the accused, remove the accused

from further involvement with children and/or youth. Once the proper authorities have been contacted and the safety of the child or youth is secured, the appointed persons should inform the accused that abuse has been reported.

- B. If abuse is observed by, disclosed to, or suspected by a volunteer and/or paid staff member of RTLNEO, the observer shall report the incident immediately to the appointed leader.
- C. If the accused is the appointed leader, the allegations shall be immediately reported to the proper authorities as required by state or local law.
- D. Notify the parents of the victim and take whatever steps are necessary to assure the safety and well being of the child or youth until the parent(s) arrive. **NOTE:** If one or both of the parents is the alleged abuser, follow the advice of the authorities concerning notification of others.
- E. Take all allegations seriously and reach out to the victim and the victim's family. Show care and support to help prevent further hurt. Extend whatever resources are needed. Remember that the care and safety of the victim is the **first** priority. Respond in a positive and supportive manner to the victim and the victim's family.
- F. Keep a written report of the steps taken by the RTLNEO in response to the reported abuse. The report should be brief and contain only factual information relevant to the situation. It should be kept in a secure place. It should be written in ink or typed to prevent it from being changed.
- G. Any contact with the media should be handled by a **pre-determined** spokesperson selected by the RTLNEO board.

IX. Implementation

Unless otherwise specifically stated, it shall be the responsibility of RTLNEO board of directors to implement this Policy, to design and conduct future training, and to ensure the ongoing effectiveness of this Policy.

X. Application

All of those who participate in the programs of RTLNEO and use its facilities – individuals, organizations, and groups within and outside this organization – are expected to respect, implement, and adhere to these provisions as a minimum.

Appendix

Application to Volunteer with Youth

Please PRINT and Complete in Full



Right to Life of Northeast Ohio
572 W. Market St. Ste 2
Akron, OH 44303
330-762-2785 ♦ Fax 330-762-8822

*This application is to be completed in full by all volunteers for any position involving the supervision, teaching or custody of minors. **Information will be treated as confidential** and is needed to help us provide a safe environment for youth who participate in our programs.*

NAME: _____
 First Middle Last

Address: _____
 Street City State Zip

How long have you lived at your current address ? _____

Phone: (_____-_____-_____-) _____ Home Cell Work **Phone:** (_____-_____-_____-) _____ Home Cell Work

Phone: (_____-_____-_____-) _____ Home Cell Work

E-Mail Address: _____

Date of Birth: _____ **Married:** Yes No **Spouse's Name:** _____
 MM/DD/YYYY

List any gifts, talents, training, skills or education that have prepared you to work with youth:

Please list any previous work or volunteering involving youth (identify organization and type of work/volunteering):

Do you have any physical handicaps or conditions preventing you from performing any activities when volunteering? Yes No **If yes, please explain:**

Please list three references. None of these should be family members.

Name: _____

Address: _____

City/State/Zip: _____

Phone: (____) - ____ - ____ Home Cell Work

How long have you known this person? _____ Relationship to you: _____

Name: _____

Address: _____

City/State/Zip: _____

Phone: (____) - ____ - ____ Home Cell Work

How long have you known this person? _____ Relationship to you: _____

Name: _____

Address: _____

City/State/Zip: _____

Phone: (____) - ____ - ____ Home Cell Work

How long have you known this person? _____ Relationship to you: _____

Code of Conduct for the Protection of Children and Youth *Read & initial each item to signify your agreement to comply*

_____ I agree to do my best to prevent abuse and neglect among children & youth involved in activities at which I volunteer.

_____ I will not verbally, physically, sexually or emotionally abuse or neglect a child or youth.

_____ I will not touch a child or youth in a sexual or inappropriate manner.

_____ I will not strike, spank, shake, slap, humiliate, ridicule, threaten or degrade any children or youth.

_____ I will refuse to give expensive gifts to or receive expensive gifts from children or youth or their parents without prior written approval from the parents or guardians AND the board of Right to Life of Northeast Ohio.

_____ I acknowledge my obligation and responsibility to protect children and youth and agree to report known or suspected abuse of children or youth to appropriate organization leaders and to civil authorities. I understand that failure to report suspected abuse may be, according to the law, a misdemeanor.

_____ I understand that this organization will not tolerate abuse of children and youth and I agree to comply in spirit and in action with this position.

_____ I will cooperate fully in any investigation of abuse of children and/or youth.

_____ I will treat everyone with respect, loyalty, patience, integrity, courtesy, dignity and consideration.

_____ I will use positive reinforcement rather than criticism, competition or comparison.

_____ I will not smoke or use tobacco products in the presence of children or youth.

_____ I will not use, possess, or be under the influence of alcohol or illegal drugs at any time while volunteering.

_____ I will not pose any health risk to children or youth.

_____ I will not use any profanity in the presence of children or youth.

_____ I agree to abide by the *Right to Life of Northeast Ohio Policy for the Protection of Children & Youth.*

Acknowledgement, Release and Signature

To the best of my knowledge, the information contained in this application is complete and accurate. I understand that providing false information is grounds for not choosing me for a volunteer position or for my discharge if I have already been chosen. If chosen to volunteer, I agree to be bound by the *Right to Life of Northeast Ohio Code of Conduct for the Protection of Children and Youth*. I understand that these may be changed, withdrawn, added to or interpreted at any time at *Right to Life of Northeast Ohio's* sole discretion and without prior notice to me. I also understand that my volunteering may be terminated, or any offer or acceptance of volunteering withdrawn, at any time, with or without cause, and with or without prior notice at the option of *Right to Life of Northeast Ohio* or myself. Nothing contained in this application or in any pre-volunteering communication is intended to or creates a contract between myself and *Right to Life of Northeast Ohio* for volunteering or the providing of any benefit.

I have read and understand the above provisions.

Signature _____ Date

Disciplinary and Legal Background

1. Yes No **Have you ever been convicted of a criminal offense (felony or misdemeanor, except for a minor traffic violation)?** You will need to answer "yes" if you have entered into a plea agreement, including a deferred sentence or deferred judgment arrangement, in connection with a criminal charge. If you have been convicted of such an offense, please attach a statement of explanation, including the nature of the offense, date, court where conviction was entered, and any other relevant information. You do not need to disclose information contained in sealed or expunged records.
2. Yes No **Have you ever been charged with a sexual offense, offense relating to children, or crime of violence?** If you have been convicted of such an offense, please attach a statement of explanation, including the nature of the offense charged, date, law enforcement agency making the charge, and any other relevant information. You do not need to disclose information contained in sealed or expunged records.
3. Yes No **Have you ever been reported to a social service agency, law enforcement authority, child abuse registry, or similar organization?**
4. Yes No **Have you ever been subjected to expulsion, reprimand or other discipline by a youth related organization or sponsor?**
5. Yes No **Have you ever been the subject of a civil lawsuit involving sexual misconduct, sexual harassment or other immoral behavior or conduct involving adults or children?**
6. Yes No **Have you ever been the subject of a complaint or disciplinary proceeding against a professional license or other license held by you, including but not limited to a license to provide childcare or similar services?**
7. Yes No **Have you ever been the subject of any disciplinary action, transfer, or dismissal, or been named as a defendant in a civil or criminal lawsuit, as a result of an accident or mishap involving children?**

THIS SECTION TO BE COMPLETED BY ANYONE WHO HAS CURRENT (WITHIN THE PAST 5 YEARS) VIRTUS OR OTHER RECOGNIZED CHILD ABUSE TRAINING PROGRAMS, AND HAS A CURRENT CRIMINAL BACKGROUND CHECK (WITHIN THE PAST 5 YEARS).

I completed my child abuse training course at _____ in _____.

location *year*

Name of training program: _____

(eg.: Virtus)

My criminal background check is on file with: _____ (_____) - _____ - _____

name of school, church or organization *Phone # for verification*

AUTHORIZATION AND REQUEST FOR CRIMINAL RECORDS CHECK

I hereby authorize *Right to Life of Northeast Ohio* to request any local, state or federal law enforcement department or other agency to release information regarding any record of any investigations, charges or convictions contained in its files, or in any criminal file maintained on me, whether said file is a local, state, or national file, and including but not limited to accusations and convictions for crimes committed, against minors, to the fullest extent permitted by local, state and federal law. A photocopy or fax of this authorization and request of information shall be valid as the original. I release any and all law enforcement departments, agencies, and their employees from all liability that may result from any such disclosure made in response to this request. I also give my permission for this information to be shared with those persons who will participate in making decisions with respect to my application. I understand that all results will remain **confidential**. I do hereby agree to forever release and discharge *Right to Life of Northeast Ohio* and their associates and all such individuals and organizations to the full extent permitted by law, from any claims, damages, losses, liabilities, costs and expenses, or any other charge or complaint arising from the retrieving and reporting of information.

Please list all address you have lived at in the past five years and the dates you lived at them:

Address	Dates

List any other names that have been used, including nicknames, maiden names or previous married names:

Date of Birth: _____ **Place of Birth:** _____
MM/DD/YYYY

Social Security Number: _____

Driver's License# : _____ **State of Issue:** _____ **Expiration Date:** _____
MM/DD/YYYY

Signature of Applicant Date

PRINTED NAME

SUGGESTED INTERVIEW GUIDELINES

There are a number of interview questions that can help in determining the motives behind why people want to work with children. Other questions can help to identify traits often found in child abusers. By asking questions, keeping notes and sharing your concerns and thoughts with other interviewers you may be able to screen-out potential abusers in the early stages of the pre-volunteering process.

- *“Tell me about yourself.”* This begins the interview with less threatening, open-ended questions. It allows the candidate some control in what he/she wants to share. They often reveal information in response to this question that you could not or would not think to ask.
- *“Tell me about your experiences with children. Have you worked or volunteered for other youth serving organizations?”* Watch for adults whose lives seem to revolve around spending time with children.
- *“Why do you want to work with children?”* Once again, watch the candidate who is too child focused or those who want to work with children because they are "pure", "innocent", "trusting", "non-judgmental", "clean", etc. Adults should want to work with children because they have something to offer children. Beware of the adult who wants to work with children because children meet adult needs for control, love, or affection.
- *“What do you do in your spare (leisure) time? What are your hobbies or interests?”* Watch for those who prefer to spend their free time with children and those whose hobbies are more appealing to children than they are to most adults (i.e., video games, photography, models, magic, etc.).
- *“Do you have any reservations about working with children or youth of different ages?”* Child sexual abusers generally have a specific age they prefer. Does the candidate indicate a preference for sex, age, certain traits?
- *“Do you think there are any reasons to treat boys and girls differently?”* Listen closely to their reasons or rationale. Does it feel right?
- *“What do you consider acceptable discipline?”* Watch for the adult who needs to control or those with positive attitudes toward corporal punishment. Listen for signs that the candidate may use psychological abuse to punish. Does their response indicate that they lack respect for children's thoughts and feelings?
- *“How do you tend to deal with stress?”* Can the candidate recognize when they are under stress? Do they have a plan for dealing with it? Is it acceptable?
- *“What makes you angry? How do you deal with anger?”* Same as above.
- *“If you saw another volunteer, one you liked and respected, strike a child, what would you do?”* Make sure at some point the candidate plans to tell a supervisor.
- *“Do you relate better with adults or with children? Why?”* Be cautious of anyone who relates better to children than adults.
- *“How would you react to any accusation of child abuse?”* Watch for a comfort level, a reasonable response, a panic look, a carefully thought out manipulative response.
- *“What would you do if a child told you a secret?”* Make sure the candidate does not make a promise not to tell.
- *Ask ‘what if’ questions.* Watch for a candidate whose responses are consistent with your philosophy, who asks other staff for help and support; one who is a team player. Note how quickly they resort to punitive punishment and how realistic or honest the responses are.

Be cautious of candidates who seem overly anxious to be hired, those who seem "too smooth" and those who try to take over the interview.



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Executive Director

*Life Education Fund
is a 501c3 affiliate with
Right to Life of Northeast Ohio*

*Contributions to Life Education
Fund are tax deductible under IRS
rules and regulations.*

<First Name> <Last Name>

<Address>

<City>, <State> <Zip>

RE: Letter of Reference for <Applicant Name>

Dear <Salutation>:

Your name was given to us by <Applicant Name> as a personal reference within an application to volunteer with youth during activities sponsored by Right to Life of Northeast Ohio. As part of our policy for the protection of children and youth, we routinely check references for all adults who volunteer to work in any capacity in our youth oriented programs.

Enclosed with this letter is a reference check form. Please complete the form in full and mail it back to us in the enclosed postage paid envelope. We truly appreciate your cooperation, and thank you for your support of <Applicant Name> as a participant in programs which advocate for the sanctity of human life from conception through natural death.

Sincerely,

Denise Leipold
Executive Director

Enclosed: Reference Check
Postage Paid Envelope



REFERENCE CHECK

Applicant name: _____

Reference name: <First Name> <Last Name>

1. What is your relationship to the applicant? _____
2. How long have you known the applicant? _____
3. How well do you know the applicant? _____
4. How would you describe the applicant?

5. How would you describe the applicant's ability to relate to children/youth? _____

6. How would you describe the applicant's leadership abilities? _____

7. How would you describe the applicant's ability to relate to adults? _____
8. How would you feel about having the applicant as a volunteer worker with your child and/or youth?

9. Do you know of any characteristics that would negatively affect the applicant's ability to work with children or youth? If so, please describe. _____

10. Do you have any knowledge that the applicant has ever been charged with or convicted of a crime? If so, please describe. _____

11. Please list the names and contact information of other people you feel it would be beneficial for us to contact before making a decision on whether or not the Applicant should work with children or youth and please indicate a means of contacting them. _____

12. Please list any other comments you would like to make: _____

Reference inquiry completed by:

Reference Signature Date

Please return this form in the enclosed envelope. Thank you for your response!

RIGHT TO LIFE OF NORTHEAST OHIO
Child\Youth Abuse Incident Report Form
PLEASE PRINT

Date-of-incident: _____ Time: _____

Place of incident: _____

Person (witness) reporting incident: _____

Name(s) of Child(ren) and/or Youth Involved:

Name Age

Name Age

Name Age

Name(s) of Adult(s) Involved:

Name Age

Name Age

Name Age

Briefly describe what happened:

Use reverse side if needed

Were there any other witnesses? Yes No If Yes, please list them:

What action did you take? _____

Has the incident been resolved?: Yes No Explain: _____

Who was notified about the incident?

Event Coordinator Parent Guardian Law Enforcement Other: _____

Signature of person reporting incident

Date

Report submitted to: _____



Guidelines for Appropriate Affection

When creating safe boundaries for children and youth, it is important to establish what types of affection are appropriate and inappropriate; otherwise that decision is left to each individual. Stating which behaviors are appropriate and inappropriate allows everyone to comfortably show positive affection to youth and children, and yet identify individuals who are not maintaining safe boundaries. These guidelines are based, in large part, on avoiding behaviors known to be used by child molesters to groom children or youth and their parents for future abuse. The following guidelines are to be carefully followed by all staff and volunteers working around or with children and youth.

1. There are many ways to demonstrate affection while maintaining positive and safe boundaries with children and youth. ***Some positive and appropriate forms of affection are:***
 - a. Brief hugs
 - b. Pats on the shoulder or back
 - c. Handshakes
 - d. "High" fives and hand slapping
 - e. Verbal praise
 - f. Touching hands, faces, shoulders and arms of children and youth
 - g. Arms around the shoulders
 - h. Holding hands during prayer
 - i. Pats on the head where culturally appropriate
2. ***The following forms of affection are considered inappropriate*** with children and youth because many of them are the behaviors that child molesters use to groom children or youth and their parents for later molestation, or can be, in and of themselves, sexual abuse:
 - a. Inappropriate or lengthy embraces
 - b. Kisses on the mouth
 - c. Touching or patting bottoms or chests, knees or legs
 - d. Showing affection in isolated areas such as bedrooms, closets, staff only areas or other private rooms
 - e. Occupying a bed with a child or youth
 - f. Wrestling with children or youth
 - g. Tickling children or youth
 - h. Piggyback rides
 - i. Any type of massage given by a child or youth to an adult
 - j. Any type of massage given by an adult to a child or youth
 - k. Any form of unwanted affection
 - l. Comments or compliments (spoken, written or electronic) that relate to physique or body development. Examples would be: "You really look hot in those jeans."
 - m. Snapping bras or giving wedgies or similar touch of underwear whether or not it is covered by other clothing.
 - n. Giving gifts or money to individual children or youth
 - o. Private meals with individual children or youth

