Checklist: Prevention Gap Analysis—Sexual Abuse and Molestation

What follows is a self-evaluation resource addressing prevention efforts in the areas of sexual abuse/molestation (SAM) and hazing. The resource is designed to help districts identify gaps in compliance and recommended practice via a detailed checklist. Through this process, the Trust hopes to promote safety among students and employees and encourage open dialogue around enhancement of risk management strategies.

Please note that this self-audit is not intended to replace or limit any current or planned district activities. Instead, based on the organization's best efforts and on information available at the time of the assessment, it is meant to establish a baseline, identify opportunities for improvement, and allow for reassessment and updating on a regular basis.

District: _____ Date: _____

Inspected by: _____

District participants: _____

_____

Board Policies and Procedures	Y	N
Does the district have the following board policies or procedures in place?		
Staff/student boundaries regarding social media. See Trust Model Policy 4-202 and accompanying procedure.	☐	☐
Equal opportunity—prohibited sex discrimination (Title IX). See Trust Model Policy 1-203 and accompanying procedure.	☐	☐
Visitors. See Trust Model Policy 3-203 and accompanying procedure.	☐	☐
Safety and emergency management community notifications. See Trust Model Policy 3-401 and accompanying procedures (A, B, C, D, E, and F).	☐	☐
Technology use. See Trust Model Policy 3-403 and accompanying procedures (A and B).	☐	☐
Board authority to employ/conduct background checks. See Trust Model Policy 4-101 and accompanying procedure.	☐	☐
Employee code of conduct. See Trust Model Policy 4-201.	☐	☐
Student supervision. See Trust Model Policy 4-203.	☐	☐
Mandatory reporting. See Trust Model Policy 4-204.	☐	☐
Student code of conduct. See Trust Model Policy 5-305.	☐	☐
Does the district require staff to execute a form covering standards for how staff may communicate with students (sample Trust form 4-202)?	☐	☐
Does the district train students on the following board policies and procedures?		
Equal opportunity—prohibited sex discrimination (Title IX). See Trust Model Policy 1-203 and accompanying procedure.	☐	☐
Technology use. See Trust Model Policy 3-403.	☐	☐
Student code of conduct. See Trust Model Policy 5-305.	☐	☐
Does the district train staff on the board policies and procedures listed above?	☐	☐
Does the district train volunteers on the board policies and procedures listed above?	☐	☐
Are the policies and procedures listed above periodically reviewed to ensure that they meet district needs?	☐	☐

Board Policies and Procedures, continued	Y	N
Are the following groups provided with copies of applicable policies and procedures or advised on where they can be found?		
Staff	☐	☐
Students	☐	☐
Volunteers	☐	☐
Are staff provided training on how to report concerns related to the above policies?	☐	☐
Are students provided training on how to report concerns related to the above policies?	☐	☐

Field Trips, Overnight Field Trips, Athletics, Clubs, etc.	Y	N
Does the district have supervision procedures in place for locker rooms and changing areas?	☐	☐
When district transportation is provided, does the district have a formal or informal policy in place regarding alternate transportation to/from the event?	☐	☐
Does the district have formal or informal policies in place regarding parent chaperones?	☐	☐
Are coaches provided with communication platforms to share schedule changes and updates with team members and parents?	☐	☐
Are coaches instructed to communicate electronically with the whole team or to include parents on messaging when 1:1 communication is necessary?	☐	☐
Does the district have formal/informal supervision procedures in place for overnight field trips?	☐	☐
Does the district have a formal/informal procedure in place concerning age limits for student guests attending student dances and events?	☐	☐
Does the district distribute the contact information for the Title IX officer at least annually to student-athletes, parents/guardians, and staff?	☐	☐
Does the district have a protocol in place to ensure adequate supervision for:		
Athletic practices?	☐	☐
On-campus athletic events?	☐	☐
Off-campus athletic events?	☐	☐
Transition periods before and after practice?	☐	☐
Locker rooms?	☐	☐
Transportation? (in all areas of the bus/vehicle)	☐	☐
Overnight athletic events?	☐	☐
Does the district have a process in place to make and manage sleeping arrangements for students and chaperones before an overnight trip?	☐	☐
Does the district have a protocol for night supervision on overnight field trips?	☐	☐
Does the district have protocols for activities that inherently impede sightlines or create supervision/visibility issues?	☐	☐
Does the district formalize agreements with third parties through an MOU, contract, or similar written agreement?	☐	☐

General	Y	N
Are there any areas of the grounds that are off-limits for students?	☐	☐
If yes to the preceding question, are staff and students made aware of this?	☐	☐
Does the district regularly review campus facilities to locate isolated areas that should be off-limits?	☐	☐
Does the district have a protocol for unlocking and then locking rooms again when they are not in use?	☐	☐
If yes to the preceding question, does this include the following areas?		
Gym	☐	☐
Auditorium	☐	☐
Locker rooms	☐	☐
Storage areas/Closets	☐	☐
Athletic rooms	☐	☐
Maintenance areas	☐	☐
Does the district have formal and/or informal procedures regarding staff pulling students from their scheduled programs?	☐	☐
If students are used to remove other students from classes, is there a formal and/or informal procedure for verifying the authenticity of the request?	☐	☐
If a student is pulled from a scheduled program, is the supervising staff member notified when the student should be returning?	☐	☐
Does the district have a way of designating if a student has been approved to leave the classroom during class time (e.g., hall pass to use the restroom)?	☐	☐
Can this hall pass or other indicator of authorization be easily replicated?	☐	☐
Does the district have a protocol for when a student does not return to the classroom after a certain amount of time?	☐	☐
Do staff members regularly walk the halls during school hours and verify hall passes?	☐	☐
Does the district have formal and/or informal procedures regarding students helping in a classroom before and after the school day?	☐	☐

General, continued	Y	N
Does the district have regular unscheduled and unexpected supervision by administrators of all program activities?	☐	☐
Does the district have a policy and procedure regarding staff and volunteers taking photographs during the school day at school-sponsored activities?	☐	☐
Does the district have formal and/or informal policies and procedures regarding monitoring passing periods?	☐	☐
Does the district have a training program for staff regarding child sexual abuse?	☐	☐
Does the district have a training program for parents regarding child sexual abuse?	☐	☐
Does the district have a training program for students regarding child sexual abuse?	☐	☐
Does the district ask students to leave blankets or other visibility-reducing items in their backpacks or lockers?	☐	☐
Are there resources available if a student develops an inappropriate fixation on a staff member or volunteer?	☐	☐
Are staff and employees trained to document and stop inappropriate student sexual behavior?	☐	☐
Do staff and volunteers use bathrooms, locker rooms, and showers that are separate from minors or, if separate facilities are not available, schedule separate usage times?	☐	☐
Are staff and volunteers encouraged to report instances or scenarios that could be misinterpreted as inappropriate boundary invasions?	☐	☐

Human Resources	Y	N
Does the district have a formal employment application process for all applicants?	☐	☐
Does the written application form require pertinent information to assess the background of applicants?	☐	☐
Does the formal employment application process include verification of the applicant's background against the state or national sex offender registry?	☐	☐
Do HR representatives search the Education Information System maintained by the AZ Department of Education prior to the employment of a certificated individual?	☐	☐
Do HR representatives search the Education Information System maintained by the AZ Department of Education prior to the employment of a non-certificated individual, especially those working with students?	☐	☐
Does the district use any other recruitment aids to identify the best candidates?	☐	☐
Do the district's standardized background investigation (pre-employment inquiry) forms include the following or similar questions for current and former employers?		
Do you have any reservations about this person working with students?	☐	☐
Was the person disciplined during employment? If yes, did the person successfully complete the disciplinary process?	☐	☐
Did the person resign pending the outcome of an investigation involving allegations of misconduct including child abuse and sexual misconduct?	☐	☐
Did the person resign in lieu of dismissal or nonrenewal?	☐	☐
If this person reapplied to the organization/business/school, would you rehire him/her?	☐	☐
Are professional and personal reference checks conducted on all applicants with access to students within the district?	☐	☐
Does the district have a probationary period for staff?	☐	☐
Does the district discuss its child sexual abuse prevention policies and procedures with candidates?	☐	☐
Are newly hired staff provided initial and annual training on policies and procedures, including mandatory reporting?	☐	☐

Human Resources, continued	Y	N
Are applicants required to sign a document acknowledging receipt of the district's policies and procedures related to maintaining professional staff/student boundaries?	☐	☐
Are applicants required to sign a document acknowledging receipt of the district's policies and procedures related to electronic communication?	☐	☐
Does the district periodically change how it presents and trains on content addressing emerging issues?	☐	☐
Has the district adopted an Educator Code of Ethics?	☐	☐
If yes to the previous question, does the district provide staff training on the Code of Ethics?	☐	☐
Are applicants asked to disclose previous criminal charges, as required by Arizona statute?	☐	☐

Mandatory Reporting	Y	N
Does the district provide staff training on recognizing signs and symptoms of child abuse?	☐	☐
Does the district provide annual staff training on mandatory reporting requirements?	☐	☐
Does the district have a process in place for investigating once a complaint has been made?	☐	☐
Does the district have a process in place for reporting once a complaint has been made?	☐	☐
Does the district provide annual staff training on the reporting procedures?	☐	☐
When feasible, does the district provide community education programs on parenting skills, the problems of child abuse, and how to avoid child abuse situations?	☐	☐

Reporting Mechanism	Y	N
Has the district adopted and published reporting procedures for students, staff, and volunteers?	☐	☐
Does the district have a communication plan related to grievance procedures and reporting mechanisms?	☐	☐
Does the district have an anonymous reporting system?	☐	☐
Are there multiple methods to anonymously report?	☐	☐

Student Safety/Support Plans	Y	N
Does the district have a process in place for developing student safety plans that take into consideration out-of-classroom times?	☐	☐
Do student safety plans include time spent on:		
Transportation to and from school?	☐	☐
Transition periods?	☐	☐
Unstructured time?	☐	☐
After-school activities?	☐	☐
On-campus, school-sponsored events?	☐	☐
Off-campus, school-sponsored events?	☐	☐
Lunch?	☐	☐
Recess?	☐	☐
Does the district have a procedure in place to ensure that appropriate staff—school nurse, coaches, transportation staff, etc.—are aware of current safety/support plans for students?	☐	☐
Does the district have a process in place for monitoring student safety/support plans?	☐	☐
Does the district have a process in place for reviewing and revising plans on a regular basis?	☐	☐
Does the district have a safety and support response team?	☐	☐
Are student safety/support plans created for both the aggressor and the targeted student?	☐	☐

Student Sex Offenders	Y	N
Does the district have a process in place for the emergency removal of the alleged offender, including investigation, termination, or re-admittance related to a sex abuse accusation?	☐	☐
Does the district have a process in place related to the re-engagement and support for the victim in relation to a sex abuse accusation?	☐	☐
Has the district identified a designated staff member who receives sex offender notifications from law enforcement?	☐	☐
Has the district identified a designated staff member to whom others with knowledge of the student's status can bring concerns?	☐	☐

Technology	Y	N
Does the district have safeguards in place on student computers to protect them from internet predators and viewing of inappropriate material?	☐	☐
Does the district have policies and procedures (formal or informal) regarding electronic communications between staff and students?	☐	☐
If yes to the preceding question, does the district train staff annually on policies and procedures (formal or informal) regarding electronic communications between staff and students?	☐	☐
Are social media sites associated with a school or district overseen by an approved administrator or team?	☐	☐
Has the district established a formal and/or informal procedure to respond to school club or athletic team requests for their own social media pages?	☐	☐
Does the district allow staff and volunteers to run their own school-based social media pages?	☐	☐
Does the district restrict access to external websites?	☐	☐
Does the district monitor email and messenger communications on school devices or school-approved communication platforms?	☐	☐
Does the district have a process in place to report and respond to issues identified on school devices, including documenting the action taken?	☐	☐

Title IX Compliance Coordinator Role	Y	N
Is there a staff member designated as the Title IX Compliance Coordinator?	☐	☐
Has the Title IX Compliance Coordinator received training in relation to the Coordinator role?	☐	☐
Have all students, staff, and volunteers been notified of the name and contact information for the Title IX Compliance Coordinator?	☐	☐
Is there a process in place for identifying and training a new Title IX Coordinator if the current Title IX Coordinator is unable to perform their duties for an extended period of time?	☐	☐

Title IX Investigations	Y	N
Does the district have a process in place for investigations?	☐	☐
Does the district have a process in place for responding to investigation findings?	☐	☐
Have supportive measures been offered to the complainant and respondent?	☐	☐
Does the district have a process for checking in with students and parents/guardians during the investigation?	☐	☐
Does the district require the Coordinator to compile a full written report of the complaint and the results of the investigation?	☐	☐
Does the district have an appeal process in place?	☐	☐
Does the district have a process for reporting incidents to the Trust?	☐	☐
Does the district have a process for responding to requests from the public and media outlets?	☐	☐
Does the district have a process for contacting parents/guardians after a complaint or allegation has been received involving their child?	☐	☐
Does the district require that psychological counseling be offered to students involved in an allegation?	☐	☐

Transportation	Y	N
Do safety plans include student transportation?	☐	☐
Does the district ask students to leave blankets or other visibility-reducing items in their backpacks?	☐	☐
Are bus seating assignments made so that students are seated with similarly aged peers?	☐	☐
Do administrators review bus seating assignments to identify potential issues?	☐	☐
Is additional supervision provided for students or routes that have been identified as having the potential for issues?	☐	☐

Vendors/Contracts	Y	N
As part of the RFP process, does the district require vendors who will have unsupervised access to students to:		
Maintain minimum liability limits for general liability and sexual misconduct equal to or greater than the potential exposures?	☐	☐
Provide proof of insurance in the form of a COI (certificate of insurance)?	☐	☐
Add the district as an additional insured on the vendor/contractor insurance policy?	☐	☐
Attest that their employment application process includes verification of the applicant's background against the state or national sex offender registry?	☐	☐
Attest that they complete background checks for existing employees on a periodic basis?	☐	☐
Attest to conducting professional and personal reference checks on all applicants with access to students within the organization?	☐	☐
Does the district create formal agreements with all vendors/contractors/ service providers who may have contact with students?	☐	☐
Does the district discuss the child sexual abuse prevention policies and procedures with vendors/contractors?	☐	☐
Are new vendors/contractors provided training on policies and procedures related to errors and omissions, including mandatory reporting?	☐	☐
Are vendors/contractors required to sign a document describing the district's policies and procedures related to maintaining professional boundaries with students?	☐	☐
Does the district have protocols in place to ensure that vendor staff are monitored and supervised?	☐	☐
Does the district check vendor/contractor contracts for insurance language?	☐	☐
Are vendors required to sign in and out when visiting schools/the district?	☐	☐
Has the district implemented any other SAM prevention techniques, polices, procedures, protocols, solutions, or trainings? If so, list below.	☐	☐

Video Trainings	Y	N
Does the district utilize the following Vector Solutions trainings for all staff?		
Hazing Awareness and Prevention	☐	☐
Sexual Misconduct: Staff to Student	☐	☐
Child Abuse: Mandatory Reporting	☐	☐
Does the district utilize the following Trust videos for trainings?	☐	☐
Trends in Sexual Abuse and Molestation Claims	☐	☐
Sexual Abuse and Molestation Prevention Summit Part 1 and Part 2	☐	☐
Webinar: SAM—Creating a Culture of Protection and Prevention	☐	☐

Volunteers	Y	N
Does the district have a formal, written volunteer application process for all applicants?	☐	☐
Does the written application form require pertinent information to assess the background of applicants?	☐	☐
Does the volunteer application process include verification of the applicant's background against the state or national sex offender registry?	☐	☐
Are professional and personal reference checks conducted on all applicants with access to students within the district?	☐	☐
Does the district discuss its child sexual abuse prevention policies and procedures with volunteer candidates?	☐	☐
Does the district have a probationary period for volunteers?	☐	☐
Are new volunteers provided initial and annual training on policies and procedures related to boundary invasion, including mandatory reporting?	☐	☐
Are volunteers required to sign a document describing the district's policies and procedures related to maintaining professional boundaries with students?	☐	☐
Does the district have protocols in place to ensure that volunteers are monitored and supervised?	☐	☐
Are volunteers required to sign in and out at the beginning/end of their shift?	☐	☐
Does the district provide volunteers a Volunteer Handbook?	☐	☐
Does the district have a formal volunteer training program that addresses appropriate boundaries for adult-to-student contact during regular school hours and with respect to outside contact, including online?	☐	☐
If yes to the previous question, does this training program include ways to report concerns?	☐	☐
Does the district have a tutoring/mentorship program?	☐	☐
If yes, do parents sign a permission form that allows their child to participate in the tutoring or mentorship program?	☐	☐
Do mentorship activities take place at a designated location and under the observation of district staff?	☐	☐