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## **Nine Steps for Preventing the Sexual Abuse of Minors on Campus**

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# Nine Steps for Preventing the Sexual Abuse of Minors on Campus

| Richard Dangel, Praesidium, Inc.

*Abstract: In the last two decades, much has been learned about how sexual abuse of minors occurs in organizations and what can be done to stop it. By understanding how sexual predators operate, colleges and universities are much better equipped to recognize potential threats before a tragedy occurs on campus. Recognizing these “red flags” is only the beginning, though. This article focuses on the types of offenders and the unique characteristics of institutions of higher education that put them at particular risk for sexual abuse of minors. Finally, the article highlights a nine-step plan any college or university can implement to better identify threats and protect minors participating in events and activities on campus.*

## Introduction

Almost daily, the media reports incidents of children being sexually abused by employees, volunteers, coaches, teachers, members of the clergy, and other minors. The statistics are equally alarming: one in four girls and one in six boys are sexually abused before the age of 18;<sup>1</sup> 10 percent of students are exposed to sexual misconduct before completing high school;<sup>2</sup> and there has been a 300 percent increase in peer to peer sexual abuse.<sup>3</sup> While no one really knows the extent of child sexual abuse on university campuses, recent headlines and a review of insurance claims and incident data suggest the risk is real, and the psychological pain to children and families and the financial costs to the institutions themselves are staggering.

## Two Decades of Progress

Little was known 20 years ago about how sexual abuse occurred in organizations and what could be done to stop it. The research simply didn't say much about how molesters operate. The notion of identifying suspicious or

inappropriate interactions as warning signs or “red flags” was not widely accepted, and organizations were reluctant to report incidents of abuse. Peer-to-peer sexual behavior was most often deemed as a developmentally normal sexual curiosity, not blatantly aggressive sexual assault, and litigation for sexual abuse in child serving organizations was all but unheard of. Now, thankfully, considerable research points to how molesters operate, what conditions are required for the abuse to occur, and best practices for the prevention of abuse and the mitigation of the damages.

Perhaps the greatest insight gained over the past two decades is that organizations now have a handle on what needs to happen to prevent and stop child sexual abuse. The challenge facing organizations today is implementing best practices and ensuring that employees and volunteers follow them.

## Types of Offenders

The two most common types of child abuse offenders are predatory and opportunistic offenders. It is helpful to differentiate between the two, because different tactics are required to keep them away or catch them.

### ***Predatory or Preferential Offenders***

Predatory or preferential offenders typically build their lives around gaining access to children. They find jobs involving children, do volunteer work involving children, marry women who already have children, attend church with programs serving children, and use social media to reach out to children. They pick out favorites; shower them with attention and gifts; give them drugs and alcohol; show them pornography; hug, squeeze, and massage them; and convince coworkers, parents, and bystanders that they love kids. Then they sexually abuse them.

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Predatory or preferential offenders often have track records or warning signs, detectable in their application materials and during the screening and selection process, which can alert the educated to disqualify them. However, if they do slip through the cracks and gain access, their behavioral warning signs and policy violations can alert the educated to interrupt the chain early, before a tragedy occurs. Recognizing these red flags then allows the organization to get rid of them.

### ***Opportunistic Offenders***

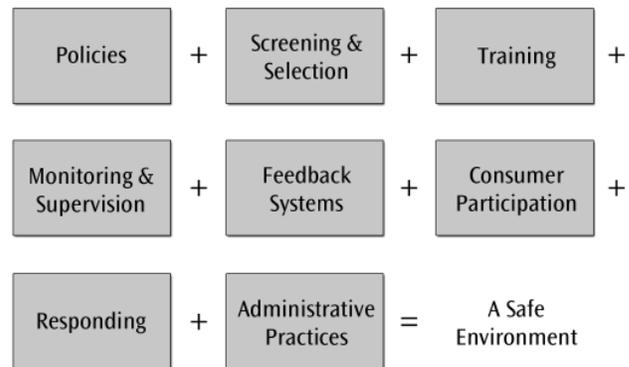
Opportunistic offenders aren't necessarily trying to gain access to children to molest them. More often, they find themselves interacting with a child or teen and boundaries get blurry. For example, when a college-aged coach interacts with a minor, teenaged athlete, the maturity levels may be very similar. Alcohol, drugs, or personal problems can also impair an adult's judgment, and they may engage in illegal behavior against a minor.

Opportunistic offenders may also take advantage of anonymity to offend. They may hang out in crowded locations where they can "accidentally" grope or fondle a minor, or in locations where children undress, such as a locker room or bathroom. The offender can become aroused, or they may photograph or video a child for distribution on the Internet and can often go undetected. To prevent opportunistic offenders from offending requires strict policies about boundaries and unsupervised contact between minors and adults and close monitoring of high-risk situations where adults may interact with children anonymously.

### **Exploitation Gaps in Organizations**

Incidents of abuse occur because a perpetrator was able to exploit gaps in one or more of the operations shown in Figure 1. The equation can be viewed as a conceptual mathematical model where organizations earn safety points under each operation dependent on adherence to best practices. How an organization earns conceptual safety points may vary based on program characteristics. For example, programs that rely heavily on short-term volunteers may not earn as many safety points in screening and selection, so to remain safe the program must increase its monitoring and supervision practices. To create safe environments for children, organizations must implement

best practices in each of the eight operations listed. Figure 2 shows sample representative best practices that can reduce risk and mitigate consequences.



**FIGURE 1: Praesidium's Safety Equation**

### **Five Characteristics that Put Universities at Increased Risk**

Most universities share five unique characteristics, which challenge risk management efforts to reduce the risk of child sexual abuse.

#### ***No Central Information Repository***

First, many colleges and universities do not have a central repository to track exactly how many and what kinds of exposures exist on campus. Campus officials should keep track of where the children are and who is minding them.

#### ***Diversity of Programs***

Second, the diversity of programs serving children can be astonishing. A comprehensive inventory of a campus is likely to identify upwards of 50 or even 100 programs involving children. Children can be on campus for a variety of reasons, including summer camps on campus managed by outside vendors, teens visiting campus to decide where they will go to college, 4H programs, foreign exchange programs, religious outreach efforts, fraternity events, students completing internships, and campus child care centers.

The examples below illustrate the range and complexity of circumstances that can contribute to child sexual abuse on university campuses.

**FIGURE 2: SAMPLE REPRESENTATIVE BEST PRACTICES FOR EACH OPERATION**

<p><b>Policies</b></p> <ul style="list-style-type: none"> <li>Implementing policies addressing:           <ul style="list-style-type: none"> <li>Appropriate and inappropriate interactions</li> <li>Contact outside of authorized activities</li> <li>Use of social media</li> <li>One-to-one interactions</li> </ul> </li> <li>Creating a Code of Conduct</li> </ul>	<p><b>Internal Feedback Systems</b></p> <ul style="list-style-type: none"> <li>Providing a process for staff, minors, and parents to file a concern or complaint</li> <li>Providing an anonymous method to file a concern or complaint</li> <li>Implementing a process for compiling concerns or complaints to review for trends</li> </ul>
<p><b>Screening and Selection</b></p> <ul style="list-style-type: none"> <li>Conducting comprehensive criminal background checks</li> <li>Reviewing applications for missing information</li> <li>Using behavioral interviewing with questions designed to assess for abuse risk</li> <li>Conducting reference checks, including personal references</li> <li>Documenting the hiring process</li> </ul>	<p><b>Consumer Participation</b></p> <ul style="list-style-type: none"> <li>Providing minors and their parents with university policies related to abuse prevention</li> <li>Providing minors and their parents with contact information for at least two levels of program personnel</li> </ul>
<p><b>Training</b></p> <ul style="list-style-type: none"> <li>Conducting an orientation with abuse prevention information before contact with minors</li> <li>Conducting position-specific abuse prevention training</li> <li>Implementing on-going training requirements</li> <li>Implementing a tracking system</li> </ul>	<p><b>Responding</b></p> <ul style="list-style-type: none"> <li>Implementing a written procedure for how staff, supervisors, and the university should respond to:           <ul style="list-style-type: none"> <li>Policy violations and suspicious or inappropriate behaviors</li> <li>Incidents or allegations of abuse</li> <li>Incidents of youth-to-youth sexual activity</li> </ul> </li> <li>Implementing procedures for responding to media inquiries</li> </ul>
<p><b>Monitoring and Supervision</b></p> <ul style="list-style-type: none"> <li>Conducting employee supervision           <ul style="list-style-type: none"> <li>Scheduled and random visits from supervisors</li> <li>Performance evaluations</li> </ul> </li> <li>Creating procedures for high-risk activities           <ul style="list-style-type: none"> <li>Bathroom procedures</li> <li>Transportation procedures</li> <li>Overnight procedures</li> <li>Transition times</li> </ul> </li> <li>Creating processes for facility monitoring</li> </ul>	<p><b>Administrative Practices</b></p> <ul style="list-style-type: none"> <li>Communicating information related to abuse prevention to the board</li> <li>Creating a standing safety committee charged with abuse risk management</li> <li>Creating defined operational standards for all programs</li> <li>Implementing procedures for selecting and approving new programs</li> </ul>

*Case Example One:* A 14-year-old boy was permitted to use the university athletic facilities because his parent was a university employee. In the locker room, a large hole had been cut in the metal partition between two adjacent stalls, allowing neighboring patrons to engage in sexual activity. On numerous occasions, the minor received oral sex from a university employee who would occupy the adjacent stall when he spotted the minor entering. The stall walls were heavily marked with sexually oriented graffiti and offers of sexual activity and were reportedly identified in chat rooms as good for sexual encounters.

*Case Example Two:* A not-for-profit youth development organization used university facilities during summer for weeklong sports training camps. On the advertising and print materials, mention was made that the camp was held on the university campus and to the casual reader appeared to be endorsed by the university. One of the camp employees befriended one of the campers and eventually sexually abused him over several weeks.

*Case Example Three:* A nursing student intern sexually assaulted a patient in the university medical center hospital while the patient was heavily medicated and recovering from surgery.

*Case Example Four:* Three five- and six-year-olds were caught inside a playhouse at the child development center with their pants pulled down and admitted to performing oral sex on one another. One of the children reported that he had to do it or he was not going to be invited to the other boy's birthday party.

### **Lack of Policy Cohesion Across Campus Programs**

Third, individual departments or programs typically establish their own policies regarding how programs are started or operated and how children or minors are supervised. With no minimum standards and little oversight, policies and practices range from excellent to non-existent.

### **Unspecified Risk-Bearer**

Fourth, the primary risk-bearer often goes unspecified or is contractually vague. For example, when an enthusiastic department manager starts an exciting university program that hosts foster children for an overnight basketball jamboree, he or she may unwittingly embrace the associated risks on behalf of the university. An independent contractor might offer a youth-serving program on campus, and the university incorrectly assumes the contractor has adequately vetted, trained, and supervised his part-time summer college student employees.

### **Lack of a Single Oversight Office**

In many instances, no single office shoulders the responsibility for this particular risk. Human resources may handle a piece in broad hiring policies and practices that may or may not apply to outside vendors or across all department or program hires. Campus security may get involved. Likewise, risk management and legal counsel are often involved at some level. However, each office may or may not see the connection across functions. When no one owns the risk, it doesn't get managed.

### **The Nine-Step Solution**

#### **Step One: Pledge a Commitment to Child Safety in All Campus Associated Programs**

The pledge must come from university leadership – loudly and often – and must assure complete transparency about what the university is doing to live the commitment. Without this public commitment, the issue will fall by the wayside, itself a victim of competing institutional demands. The commitment must be backed up by an action plan and the authority and resources to ensure full implementation.

#### **Step Two: Form a Child Safety Task Force**

Task force members must represent diverse stakeholders with influence and have access to the president. The task force will develop the action plan, work to accomplish leadership buy-in across campus, and lead the implementation of the action plan.

#### **Step Three: Heat Map the University**

Systematically identify and describe all youth-serving programs and potential youth exposures under the university umbrella. Determine how each program is managed, what contractual arrangements are in effect that may be relevant, the incident and loss run history, and the program's relevance to the mission of the university.

#### **Step Four:**

##### **Develop Minimum Standards**

Require all programs that serve minors to comply with certain minimum standards. If they are consistently enforced, 15 or 20 broad reaching policies can manage most of the risks in youth-serving programs. Aim for policies that apply across all programs. To the extent possible, avoid developing specific standards for each program or each risk. Do not worry about necessary exceptions, modifications, or amplifications until the overarching standards are specified and in place. Once

the broad reaching policies are established, drill down to program-specific policies. The greater the uniformity and applicability of standards across all programs, the greater the likelihood standards will be implemented. Monitoring the exception is far more cost effective than monitoring each and every circumstance.

#### **Step Five: Provide Compulsory Abuse Prevention Training**

Anyone who provides services to minors on campus must complete sexual abuse awareness training. Texas Senate Bill 1414 hits the mark: training is required for each individual in all child-serving programs operated by or on the campus of an institution for higher learning for the purpose of recreation, athletics, religion, or education.

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Training content must match the needs of the recipient. Front line staff must know how to spot inappropriate or suspicious interactions and policy violations. Those involved in staff screening and selection must know how to use behavioral interviewing and how to identify warning signs in applicant backgrounds. Supervisors must know how to respond to reports of inappropriate or suspicious interactions and policy violations, and so on. Effective training requires on the job feedback, just in time reminders, and frequent refreshers.

### ***Step Six: Monitor and Enforce Compliance with Standards***

Programs must be held accountable to ensure that all policies and procedures are in place for all youth-serving programs. Documentation can be online with occasional on-site spot checks to verify reports. Programs that fail to comply with standards must be put on notice, and, if corrective action does not follow, non-compliant programs should be quickly discontinued.

### ***Step Seven: Remove Barriers to Reporting***

Of all the risk management practices a university can implement to increase the safety of minors on campus, removing barriers to reporting suspicious or inappropriate interactions, policy violations, and suspected or known risks, such as holes in bathroom stalls, remains critical. Once the university community knows what to watch for, how to report it, and that the university will respond appropriately, perpetrators will migrate elsewhere. Like any good criminal, if they fear detection or capture, they move along.

### ***Step Eight: Develop Systematic and Consistent Methods to Respond***

Because most people have little or no experience responding to reports of suspicious or inappropriate interactions or suspected child abuse, and because the thought of an adult sexually abusing a child seems unfathomable to most, reports are often handled inconsistently or incorrectly. No one knows quite what to do. To prevent this from happening, the university should develop a flow chart listing step-by-step procedures to govern exactly what steps to take and by whom in response to all reports.

### ***Step Nine: Build Feedback Loops to the Top of the University***

Because the commitment begins at the top, feedback about implementation successes and barriers must be presented regularly to university leadership, including board members, who can ensure ongoing support and accountability.

### ***Conclusion***

One incident of child abuse on campus is one incident too many. Because abuse is such a low-frequency event, it often falls off the radar screens of organizations. However, abuse is a high-intensity event. When it happens, the consequences are enormous: lives are ruined and reputations destroyed. The information needed to solve the problem is readily available, but the challenge remains implementation. The nine-step risk management model described here has been implemented in numerous large scale regional and national roll outs with success and can provide universities with the map to create abuse-free environments.

## About the Author



*Dr. Richard Dangel* holds advanced degrees from The University of Kansas and The University of Michigan. He is a doctoral level licensed child psychologist with more than 25 years of experience in abuse risk management, quality assurance, and program evaluation. Dr. Dangel has been

a tenured full professor at The University of Texas at Arlington, published three books and dozens of scientific articles, and delivered more than 1,500 papers and workshops around the world.

In addition to his work at Praesidium, Dr. Dangel has served on the National Research Advisory Boards of the YMCA of the USA and Father Flanagan's Boys' Town and on the boards of numerous philanthropic organizations. He has also served as a consultant to Chartis, Lexington, Lloyd's of London, The Redwoods Group, Willis, and Church Pension Group advising underwriters and claims managers about managing and underwriting abuse risk coverage in organizations. Dr. Dangel has written curriculum for more than 30 specialized online training courses on the subject of abuse prevention in organizations.

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### Endnotes

- <sup>1</sup> *Adverse Childhood Experiences Study: Data and Statistics* (Atlanta, GA: Centers for Disease Control and Prevention, National Center for Injury Prevention and Control, 2005), <http://www.cdc.gov/ace/prevalence.htm>.
- <sup>2</sup> *Educator Sexual Misconduct: A Synthesis of Existing Literature* (Washington, DC: US Department of Education, Office of the Under Secretary, 2004), <http://www2.ed.gov/rschstat/research/pubs/misconductreview/report.pdf>.
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