Implementing Plan to Protect®

# Step One – Beginning the Process:

* **Purchase *Plan to Protect®*** **the Manual.**
* Read through policies, plans, and appendices.
* **Establish a committee.** Identify the key leaders who understand the importance of a protection plan for your organization. They will have the job of helping to draft policies, recruitment and screening of volunteers, training of volunteers and staff and implementing a protection plan within your organization.
  + Suggested committee: board members, individuals gifted in administration, training and leadership.
* As a committee assess the programs and activities that you currently provide. This guide will help you determine the programs and activities that will fall under Plan to Protect®.

**Risk Assessment**

|  |  |  |  |
| --- | --- | --- | --- |
| **Risk Category** | **Risk Factor** | **YES / TRUE** | **NO / NOT TRUE** |
| **Degree of Isolation** | The staff member or volunteer may have opportunity to be alone with children/youth or vulnerable persons. |  |  |
| **Degree of Supervision/**  **Leadership** | The staff member or volunteer has limited or no supervision or is considered a person in a leadership role with authority. Children/youth and vulnerable persons would have contact with this person and consider them to be an authority figure. |  |  |
|  | The activities of the staff member or volunteer are in a place where activities are not observed or monitored regularly. |  |  |
| **Access of Property** | The staff member or volunteer may have access to personal property or money of persons served. |  |  |
|  | The staff member or volunteer has access to confidential information related to children/youth and vulnerable persons. |  |  |
| **Degree of Physical Contact** | This role requires the staff member or volunteer to have physical contact with children/youth or vulnerable persons. |  |  |
| **Vulnerability of Persons Served** | Persons served have language or literacy barriers. |  |  |
|  | Persons served are immobile. |  |  |
|  | Persons served have challenges that contribute to their vulnerability (e.g. physical, psychological, and situational.) |  |  |
| **Degree of Physical Demands** | The activity involves potential danger to person served (e.g. rock climbing, using a stove) |  |  |
|  | Activity involves potential stress (e.g. children upset by visit to elderly in palliative care) |  |  |
| **Degree of Trust** | The staff member or volunteer develops close, personal relationships with the children/youth or vulnerable persons they serve. |  |  |
|  | Parents and care givers entrust children/youth or vulnerable persons into this individual’s care, i.e. teaching, visiting, mentoring, tutoring, nursery care |  |  |
|  | The position involves transportation of children/youth or vulnerable persons. |  |  |
|  | The staff member or volunteer contribute to making career or other important decisions of persons served. |  |  |

|  |  |  |  |
| --- | --- | --- | --- |
| **Degree of Inherent Risk** | The activity heightens potential for the staff member or volunteer to be in contact with bodily fluids or disease of the person served. |  |  |
|  | The activity exposes the person served to operation or handling of potentially dangerous equipment (e.g. playground equipment, lawnmower) |  |  |
|  | The activity exposes the person served to handling toxic substances or results in exposure to poor air quality, noise, etc. (e.g. demolition in an inner-city mission.) |  |  |

* **Assess your current policies and procedures**
  + **Complete Plan to Protect® Assessment Tool:**
* <https://www.onlineassessmenttool.com/plan-to-protect-r-assessment/assessment-33746>
* This will help you to determine your next steps for your abuse prevention program and to help to you assess where there may be gaps in your process
* **Establish a budget and present it to your leadership for approval.**
  + Membership
  + Criminal Record Checks
  + Training
    - Certification Training for Administrator
    - Certification Training for Trainer
    - On-site trainings
    - On-line trainings
  + Administrative support
  + Information Management System
* **Determine the level of support that you need.**
  + No support needed: Do it yourself with the *Manual* to guide you.
  + Plan to Protect® Membership Support
    - Basic Membership:
      * Email and phone support
      * Access to Special Interest Webinars
      * Access to Membership Section of the Website
      * 10% discount on additional services
    - Implementation Membership:
      * Customized policy draft
      * Certification for a Trainer
      * Benefits of Basic Membership
    - Going the Distance Membership (three year membership):
      * Assessment
      * Customized policy draft
      * Certification for Administrators
      * Certification for Trainers
      * Unlimited training for volunteers/staff
      * On-site trainings
      * Application fee for Plan to Protect® Seal of Excellence
* **Customize your policies (3 options)**
  + **Option 1:** Customized Policy Draft by Plan to Protect®
    - Request a quote for us to write the policy on your behalf
    - Complete the questionnaire (provided by Plan to Protect®) and schedule a phone interview with the Plan to Protect® team member assigned to develop your policy.
    - Once a draft has been created, we will send it to you for review and you can determine if there are changes to be made.
    - This process is generally a 2-4 week process depending on the size and structure of your organization.
  + **Option 2:** Register for and attend the Admin/Leader Course offered by Plan to Protect® and complete the 3 assignments within 12 weeks after the course date which include:

Assignment 1 - Recruitment and Screening Process

* Develop a recruitment and screening process which follows the steps from recruiting volunteers and staff through to the point of final approval. Use the Evaluation Template on your USB as a guide.

Assignment 2 – Customized Policy Worksheet

* + - Complete the Customized Policy Worksheet before beginning to work on your policy

Assignment 3 - Policy

* + - Using the Policy Template on your USB key, begin to customize the policy for your programs, building and/or meeting spaces and organization as a whole.
    - Customize the Appendices and Forms needed to support your policy and to reflect your organization.
    - Submit all assignments to Plan to Protect® and receive feedback within 3-4 weeks.
  + **Option 3:** Develop your own Policy utilizing Appendix 2 in the *Manual* (electronic version of appendices available – see page 2 of the *Manual* for download instructions and access code.)

# Step Two – Policy Approval:

* **Make revisions to the policies based on our/your review and recommendations**
* **Compare your policies to insurance requirements ensuring that they are in compliance**
* **Have your policies reviewed by other Program Leaders, Leadership and Board**
* **Have legal counsel review your policies**
* **Secure policy and screening process approval from the Board and have them make a motion to approve the policies**

# Step Three – Recruitment and Screening of Staff and Volunteers:

***PLEASE NOTE:*** *Prospective volunteers and staff in the process of completing the recruitment and screening process should not been placed in positions of trust*

* **Administrator and/or Committee** 
  + Ensure an Administrator or a Committee has been appointed to oversee the recruitment and screening process that has been adopted and to keep track of documentation and each component of the process
* **Compile a list of all volunteers and staff within organization**
* Make a master list of all volunteers and staff within your organization
* Use a checklist to determine if all current personnel have completed all necessary components of screening – See Recruitment and Screening module and/or Appendix 3c “Personnel Approval Checklist” in manual for assistance
* **Recruitment of personnel**
  + Identify roles and create job descriptions for needed program personnel
* Post needs on website, in bulletins, etc.
* Identify and communicate within organization where prospective volunteers/staff can pick up the documents for screening and to apply to be a volunteer
* Ensure that prospective personnel wanting to apply to volunteer have been known to the organization for at least 6 months prior to beginning screening (6 Month Waiting Period). This may not be possible if you are a school, camp, community centre. In lieu of waiting period, add one additional reference from an organization where they have served in the past.
* Ensure that initial approval of prospective program personnel has been given by leadership (this is generally done by someone in leadership, other than the Administrator, so that if there are any reservations regarding a prospective volunteer/staff this can be addressed before screening begins).
* Put together a “Documents for Screening” package to have ready for prospective volunteers/staff. This should include:
  + Application Form (for Youth Volunteers or for Adults Volunteers/Staff)
    - Application form includes “Release of Information and Declaration of Intent”
    - Statement of Faith & Beliefs or Codes of Conduct
  + Reference form requesting contact info for at least 3 references
  + Document/instructions for obtaining Police Record/Vulnerable Sector Check
  + Information about the Plan to Protect® Training that will be required before beginning to volunteer (Orientation and Annual Refreshers)
  + Covenant of Care or Code of Conduct
  + Job description of role (optional)
* **Personnel Files – Keep All Records Permanently!**
* All volunteers and staff should have a personnel file which is kept in a secure locked office or locked cabinet and all documents are to be ***kept permanently!***
* Each personnel file should include the following completed documents:
  + Appendix 3c from the *Manual* “Personnel Approval Checklist” stapled to inside of file folder
  + Application Form
  + Job Description (if applicable)
  + Police Record/Vulnerable Sector Check
  + Signed Covenant of Care
  + Signed Statement of Faith and Belief/Code of Conduct or similar agreement between personnel and organization
  + References that were contacted and written recording of what was discussed
  + Interview form and written recording of what was discussed
  + Certificates of completion for all Plan to Protect® Abuse Prevention training that has been attended
  + Volunteer Driver Agreement (if applicable); Driver abstract (if applicable)
* **Contacting References**
* Assign Administrator/Committee Member/Leadership to contact references
* Decide how references will be contacted – by phone, in person, by email
* Use or adapt sample “Personnel Reference Form” for assistance when contacting references (See appendix 7 in the *Manual*)
* Contact at least 2 references for volunteers and 3 for staff positions
* Make note of any “red flags” that are presented
* Keep completed form in personnel file permanently, signed and dated, and keep this confidential
* **Conducting the Interview**
* Assign Administrator or someone on committee or in leadership (multiple people is recommended) to conduct the interview
* In-Person interview is conducted and written records taken
* Use or adapt sample “Personnel Interview Form” for assistance (See Appendix 8 in the *Manual*)
* Make note of any “red flags” that are presented
* Keep completed form in personnel file permanently, signed and dated, and keep this confidential
* **Criminal Screening Checks**
* Create document outlining steps for volunteer to obtain Vulnerable Sector Scans and/or Criminal Record Checks (include process of what to do if check is “flagged”) to include in Documents for Screening package
* Ensure Vulnerable Sector Scans and/or Criminal Record Checks have been obtained for each prospective and current personnel
* Ensure that any previous history with the Child Welfare Agency has been identified through the screening process
* Create a notification system for Administrator to renew police record checks every three (3) years on all personnel 16 years of age and older
* Keep police record checks permanently, and keep confidential
* **Final Approval** 
  + Submit completed personnel file to leadership for final approval
  + Have leadership sign and date approval on Personnel Approval Checklist on front of personnel’s file.

* **Begin as Volunteer/Staff**
  + Volunteer/Staff is given job description (if not given previously)
  + Volunteer/Staff is given policies/procedures for their program area
  + Newly approved personnel have been placed in programs where approved personnel are already in place so that they have support and supervision
  + New volunteers should be partnered with seasoned staff and volunteers
  + Master Volunteer List is updated listing newly approved personnel

# Step Four – Training

* **Planning your training events:**
* Make both Plan to Protect® Orientation and Refresher courses available on an annual basis
* Schedule your training well in advance, provide options for your staff and volunteers to enable 100% compliance
* Advertise training dates and locations to all within the organization well in advance
* Inform potential volunteer of upcoming training dates – either at your organization if an onsite, or on-line with Plan to Protect®
  + Prospective Volunteer/Staff attend onsite training within your organization, or they sign up for a Live Webinar or Automated On-line training with Plan to Protect®
* Ensure that attendance is taken at training courses with attendance noted in personnel file, and attendance records kept permanently in separate file
* Certificates for those who have completed the training have been created, signed and dated, and filed in each personnel’s file with Personnel Approval Checklist updated
* Master Volunteer file updated with date which each personnel has taken the training
* **4 Options for Orientation and Annual Refresher Trainings**
  + **Option 1: In-house training**
    - Select a gifted / skilled individual from your organization to be your trainer
    - Send them to the **Train the Trainer Certification Course with Plan to Protect®** to become a Certified Trainer and learn how to train others within your organization on awareness of, protection from, and prevention of abuse.
    - Benefits of the Train the Trainer course:
      * Access to Training PowerPoints, Instructor and Student Notes, and tools for holding Orientation and Refresher trainings
      * Explore creative methods to assist with different learning styles
      * Learn strategies to train members (adults and youth) of your organization in internal policies and procedures
      * Get tips on how to handle the response and reporting of allegations and suspicions of abuse
      * Opportunity to ask questions, and gain the information needed to answer questions during training sessions
      * Receive certification to teach the Orientation and Refresher Training to your organization’s staff and volunteers
  + **Option 2:** **On-site training**
    - Contact Plan to Protect® to arrange for one of our National Trainers to conduct an onsite training or a private webinar for your group
  + **Option 3:** **Live Webinar training**
    - Send a group or individuals to attend a monthly Orientation or Refresher LIVE Webinar with Plan to Protect®. (Youth Working with Children webinars also available quarterly or on a private basis). See [plantoprotect.com/schedule](http://www.plantoprotect.com/schedule) for dates, times and to register
  + **Option 4:** **On-line training**
    - Sign up individuals from your organization for automated, module-based training with Plan to Protect®. Go to: <https://plantoprotect.schoolkeep.com/> for courses
* **Fire Drill and Lockdown Procedures (if meeting in a building)** 
  + Conduct an annual fire drill and lockdown drill ensuring that program personnel and parents/ guardians understand the process and expectations

# Step Five - Getting Program Areas Ready

* **Based on your approved policies and procedures, ensure that the following is in place**:
  + Create a Binder for each program and or classroom where programs occur
    - Binder should be clearly labeled with program name and should include: (see appendices in manual for sample forms)
      * Blank registration forms for specific program
      * Blank Health and Medical Consent and Release Forms (for programs where parent is off-site)
      * Blank attendance and or sign-in/ sign-out sheets – which can be filled in for each day of program
      * Blank incident report forms
      * Blank suspected abuse report form
  + First Aid Kits – prepare the first aid kit according to recommended guidelines. Ideally you should have a first aid kit available in each program area or room
    - Note on the First Aid kit for personnel to fill out an incident report each time the kit is used.
  + Stock freezers with ice packs for use if injury occurs
  + Ensure that program personnel understand the sign-in and sign-out procedures for each age group that they are working with
  + Ensure that program personnel know that they must obtain a Registration Form (and Medical Consent and Release Forms for all day)
  + For all day programs or programs where parents/ guardians are off-site – ensure that written permission is given from guardian if they are not the ones who are going to be signing out the child or youth at the end of the program day
  + Post Diaper Changing and Handwashing procedures clear and visible in area where this may occur
  + Post Fire Emergency Plan in each room of the building
  + Ensure fire extinguisher or other fire safety equipment is located in areas recommended by the local fire station

# Step Six – Documentation Management

* **All documentation should be kept permanently**
* **Keep the following documentation permanently and locked in a secured filing cabinet or locked office:** 
  + All Personnel Files with screening documentation
  + All Personnel Files for prospective personnel which are not complete but still in progress
  + All Attendance Records for Orientation and Refresher Trainings
  + All Attendance Records for Programs
  + All Sign-in and Sign-out records
  + All filled out Incident Reports Forms
  + All filled out Suspect Abuse Report Forms
  + All Registration forms
  + All Permission Forms (Letters of Informed Consent) collected for various programs
  + Any other forms which pertain to specific programs or children and youth and vulnerable adults registered for your programs, i.e. Medication Forms, etc.
* **Information Management Systems**
  + Records can be kept and scanned on computer systems to help keep track of your documents electronically. Contact Plan to Protect® for recommended Information Management Systems.
* **Electronic Documents**
  + Keep in mind that electronic files can become corrupt or unable to open
  + We recommend keeping files in multiple places (backed up to a network, on an external hard drive and on multiple computers); and in multiple formats (hard copy – paper files and soft copy – electronic files)
  + Please note that external hard drives and USB keys and DVD’s, etc., do have a shelf-life, so we recommend updating and backing up files regularly.

# Step Seven – Planning an off-site event or activity of elevated risk

* Give organizational leadership the event details including date of event, departure and arrival time, location, supervising adults, a list of things to bring, and program lead approval to parents well in advance of the date and request consent from them.
* Ensure that Informed Letters of Consent (permission forms) and Medical Release and Consent forms are given to parents/guardians a few weeks in advance of the trip detailing the nature and potential risks that may be associated with the types of activities which will be associated with the trip
* Ensure that you have an ‘Emergency Contact Card’ (see appendix 21 in *Manual*) for each participant and bring them with you.
* Give a list of participants on the trip at the organization’s office.
* Give a contact number for the person in charge of the event at the organization’s office.
* Give contact number for destination at organization’s office.
* If drivers are used, make sure that the proper consent forms have been filled out.
* If location changes unexpectedly, ensure that this is communicated clearly to the parents/guardians and consent forms are changed and initialled.
* Give a map to the off-site location at the organization’s office.

# Step Eight – Maintain Plan to Protect® on an on-going basis

* Weekly: Set aside approximately 15-30 minutes to review your attendance records, ratios and incident reports. If time permits, compare the attendance records against your registration forms. Make sure you have registration forms for each child who has attended your programs. Ensure that after each program day, all attendance sheets, sign-in/sign-out, incident reports and all other forms are reviewed by the program personnel and are filed in the secured locked cabinet or locked office and are kept permanently
* Monthly: Set aside approximately one hour to compare your volunteer and staff duty roster against your Master List of screened workers. Also insure your Letters of Informed Consent communicate the risks associated with the activities that you have scheduled to do
* Annually: Set aside approximately one day to audit/test your procedures against your Plan to Protect® policies, update your templates and forms, and to schedule your Plan to Protect® Orientation and Refresher trainings. Make sure these training dates are put on the Master Schedule and communicated to the volunteers
* Review your policies every 1-3 years as needed to ensure they are current and up to date. Amend your policies as needed
* Update Criminal Record Checks every 3 years
* Make sure your Trainers and Administrators maintain their certification. Certification for Administrators and Trainers expire every three years. Recertification is essential to ensure you are using updated resources, training materials and PowerPoints providing proper training content

# Step Nine – Audit your policies

* It is recommended that an audit be done on an annual basis selecting a different department each year to review. If this is not possible, schedule an audit no less than every two to three years with all departments.
* Recruit an audit team.
* Policy Audit should be the responsibility of the Board and can be delegated to a sub-committee of the Board.
* Plan ahead by scheduling when the audit will be completed.
* Plan to Protect® recommends an audit committee of 3-4 people. The audit committee should have no less than two people. Ensure the committee is made up of individuals who can be as objective, and have influence. Consider appointing an external LEAD. Assign responsibilities of committee members.
  + - Chair
    - Secretary
    - Members
* Schedule:
  + 12 weeks out: The committee members should re-read policies in their entirety for the organization. The committee should also determine what departments the audit will be completed on. Schedule the on-site audit with program leaders as determined necessary.
  + 9 weeks out: Send a letter to program leaders informing them that a policy audit will be conducted outlining steps and notifying them of critical dates.
    - Request that the attached questionnaire be completed and submitted with supporting documentation (as requested) with a due date of four weeks prior to on-site audit.
  + 4 weeks out: Collect completed questionnaire
  + 1 week out: Send reminder to program leaders when the on-site audit will be done.
* Observation:
  + Week of on-site audit: Determine the schedule for the on-site audit including:

1. Outside of program review (sample processes)
   1. Walk through of facility observing high risk areas (review site lines into classrooms)
   2. Location of first aid kits (contents of first aid kits)
   3. Location and review of incident reports and suspected abuse report forms
   4. Review of personnel files
      1. Cross reference random names of screened workers
      2. Is the personnel files under lock & key in a fire proof secure location?
   5. Location of attendance sheets (select random dates throughout the year and cross reference duty list)
   6. Off-site trip files
      1. Review attendance list
      2. Cross reference this with collected “Informed Letter of Consents with Waiver and release”.
      3. Cross reference driver abstracts and Informed Letter of Consent Forms.
2. During program (sample observations)
   1. Appropriate touch / In-Appropriate touch
   2. Washroom guidelines
   3. Diapering procedures
   4. Occasional observers within classroom
   5. Hall monitors on duty
   6. Discipline steps
   7. Use of open door policy
   8. Sign-in and sign-out procedures for children under 6
   9. Marking attendance
   10. Computer and internet use

* Following the audit
  + Immediately following the on-site (if possible the same day). Conduct a debrief meeting documenting observations and concerns.
* Divide the responsibility of reviewing and cross – referencing the supporting documentation i.e. cross reference list of screened workers with training sheets and duty roster. Cross reference duty roster with attendance sheets. Cross reference registration list with attendance sheets. Review survey responses, identifying common responses. Make notations of areas of concern or missing information. Make notations of best practices.
* Conduct a site inspection
  + Monitor clear site lines into classrooms,
  + Observe interaction with minors,
  + Locks on storage closets,
  + Contents of first aid kits,
  + Bulletin boards/photography etc.
* Survey stakeholders
  + Parents ; Program Leaders ; Volunteers and helpers ; Potentially older children and alumni
* The week following the on-site audit:
  + Together review the findings and note best practices and inconsistencies
  + Identify what policies are adhered to and what policies are not being followed
  + Determine the outline for report and assign who will prepare the report
    - Report should be written within a 2-week time frame to ensure critical information is not lost or forgotten
    - Report should also include recommendations and time-line for compliance. (Once the report is prepared all committee members should review the report for accuracies)
    - If any questions arise, contact the program leader for clarification
* Present the report to the Board and Program Leaders.
  + Identify timelines for improvement and compliance. Make sure that follow-up is done on these timelines.

## Plan to Protect® strongly recommends that you use an external organization to do policy audits alongside a sub-committee of the Board. It is NOT recommended that a policy audit be conducted by those responsible for implementing and managing the policies and procedures. Plan to Protect® is available to conduct policy audits; if interested, please contact us for a quote.