

The Mosaic Project

Child Abuse Prevention Policy

Introduction

The Mosaic Project strives to create a safe and nurturing environment for youth, employees, and volunteers so that everyone can grow, learn, and have fun. Part of creating a safe environment is making sure that youth are not harmed in any way while participating in Mosaic's activities. To this end, Mosaic creates a culture where child sexual abuse is discussed, addressed, and prevented.

Definitions

- Children and youth: Anyone between the ages of zero and 17 years, including Outdoor School students, youth leaders, students participating in our In-School programs, volunteers, and any other children/youth who come into contact with The Mosaic Project. In this document, these terms are used interchangeably.
- Child sexual abuse: Any sexual activity with a child where consent is not or cannot be given. This includes sexual contact that is accomplished by force or threat of force, and all sexual contact between an adult and a child, regardless of whether there is deception or the child understands the sexual nature of the activity. Sexual contact between an older and a younger child also can be abusive if there is a significant disparity in age, development, or size, rendering the younger child incapable of giving informed consent. The sexually abusive acts may include sexual penetration, sexual touching, or non-contact sexual acts such as exposure or voyeurism.

I. Screening and Selecting Employees & Volunteers

Goal

To select the best possible people for staff and volunteer positions and to screen out individuals who have sexually abused youth or are at risk to abuse.

General Principles

Screening for child sexual abuse prevention is integrated into the general screening and selection process. Child sexual abuse prevention is one of the many areas considered when deciding whom to select.

Screening

Who is screened:

- The Mosaic Project screens all applicants, both adults and adolescents, for all positions that have contact with children/youth, including adults applying for employment, adults applying for volunteer positions, and youth applying to be cabin leaders (youth leaders).
- All of the above are required to submit written applications and undergo personal interviews, and all are rigorously screened as detailed below.
- All applicants are required to read and sign a code of conduct agreement with their application.
- No exceptions are made to the required screening process, including for people who the interviewer/screener knows or with whom they have worked in the past.

Written application includes:

- previous work and volunteer experiences

- history of criminal activity, including perpetrating child sexual abuse and violence against youth
- permission for contacting personal references and performing a criminal background check.

Checking applicants against internal records:

Lists of applicants who are disqualified during the screening process and employees/volunteers who are dismissed because of an offense will be maintained by The Mosaic Project. During the screening and selection process, Mosaic checks current applicants against these lists to make sure the applicant has not been previously disqualified or dismissed.

Internet search

The Mosaic Project searches the internet to find additional relevant information about all applicants. Any information found that might possibly be relevant is considered, once it is confirmed to be associated with the applicant (recognizing that identity cannot always be definitely determined). For child sexual abuse, absolute disqualifiers include violent behavior and child sexual abuse perpetration history. Any information that potentially disqualifies an applicant requires approval by both the Executive Director and President of the Board before the applicant can be offered a position (either as a volunteer or employee).

Personal interview:

The personal interview provides an opportunity to meet applicants, determine if they are a good fit for The Mosaic Project, and ask additional questions to screen for child sexual abuse risk factors. The personal interview is in-depth, uses scenarios to demonstrate how the applicant would apply their skills to various situations with youth, and specifically addresses any gaps in the applicant’s work history timeline.

Reference checks:

Reference checks provide additional information about applicants and help verify previous work and volunteer history. The Mosaic Project obtains at least three references for each applicant as follows:

- Obtain verbal—not just written—references for applicants.
- Match references with employment and volunteer history. (Is anyone important missing from the references, such as the supervisor from the applicant’s most recent job?)
- To provide a more complete picture of the applicant, the references come from a variety of sources and are not limited to family members or friends.
- Many employers only provide basic information, such as dates of employment or rehiring eligibility. If a former employer will only provide limited information, Mosaic clarifies whether the person providing the reference is limiting information because of company policy.

The following questions may be useful for reference checks:

- How would you describe the personal characteristics of the applicant?
- How does the applicant interact with youth?
- Why would this person be a good candidate for working with youth? Is there any reason this person should not work with youth?
- Have you seen the applicant discipline youth (other than his/her own children)?
- Would you hire this person again? Would you want him/her in your organization in the future?

Criminal background checks

- Criminal background checks are required for anyone over the age of 18 who will work with children/youth.
- Criminal background checks are one part of child sexual abuse prevention efforts, but they are not comprehensive or complete information about possible prior sexual abuse. Remember that many sexual predators have not been caught/prosecuted.

- Applicants are screened as a final condition before any offer is made. Applicants who do not make it through the written applications, personal interviews, and reference checks do not need a criminal background check.
- Applicants will complete a Livescan fingerprint form and take it to a Livescan center for processing.
- Any record of criminal activity requires approval by both the Executive Director and President of the Board before the applicant can be offered a position (either as a volunteer or employee). Not all offenses disqualify applicants (for example, driving offenses may not disqualify the applicant, but the applicant may be required to sign an agreement not to drive any participant in his/her car). For child sexual abuse, absolute disqualifiers include violent behavior and child sexual abuse perpetration history.
- The results of criminal background checks are strictly confidential.

II. Guidelines on Interactions Between Individuals

Goal

To ensure the safety of youth in their interactions with employees/volunteers and with each other.

General Principles

The Mosaic Project strives to nurture each child, foster self-respect and self-esteem, build community, and foster mutual respect within the community. Coercion is never tolerated, nor is any action that is antithetical to our mission, including violence, child abuse, or sexual abuse. We attempt to tailor the following approach to the developmental age and maturity of the children/youth and also match the cultural context of the populations we serve. We intentionally build our programs around group activities, rather than individual activities. Whenever a child must leave the group for any reason, a buddy system must be used to prevent isolation of youth.

Staff manual

The Mosaic Project addresses all the issues in this policy in great detail in the staff manual, which is hereby expressly incorporated into this policy. This is further addressed in each youth leader contract, as well as all staff contracts. One relevant excerpt from the staff manual is as follows:

I. Interaction with Students

You must work to ensure the emotional and physical safety and well-being of our students at all times. You must never hit, mishandle, or verbally or emotionally mistreat a student or youth leader and must take care to treat them all equally and with respect. For your own protection and that of The Mosaic Project, we require that you exercise extreme caution and conservative judgment when touching any child. You must never be entirely alone with any child for any amount of time.

For the sake of everyone's well being (yours, the students', and The Mosaic Project's), we ask that you never be alone with a student at any time. If you need to have a one on one discussion with a student, be sure that you are visible to others. Please be very conscious of all physical contact you have with students. We are not saying that you can never hug or touch a student. Just be careful that nothing you do or say can be perceived as making sexual advances towards a student.

Critical Strategies for Guidelines on Interactions between Individuals

Positive Discipline

Children learn best when they learn self-esteem simultaneously. Positive discipline techniques such as these foster self-esteem and further enhance children's positive feelings about themselves, others, and the program. If used consistently, these techniques can actually prevent inappropriate behavior. This is addressed in depth with all staff and cabin leaders during training and in their manuals.

Ratios of employees/volunteer to children/youth

- In the Outdoor School, each cabin has no more than 12 children, with no less than 1 cabin leader and 1 adult facilitator. Each cabin is single-gender (children, cabin leaders, and adult facilitators). No adult facilitators sleep in cabins; only cabin leaders sleep in cabins with the children. Each sharing group has no more than 18 children, with no less than 2 adult facilitators and 2 cabin leaders, preferably of both genders. No adult or cabin leader may ever be entirely alone with a student, nor accompany a student into a bathroom or shower stall.
- In the In-School Program, all activities are conducted with the classroom teacher present. One facilitator may conduct a classroom activity, or multiple facilitators may be employed, according to the specific circumstances.
- In the Youth Leadership Program, no activity is conducted one-on-one. All activities are conducted in groups of youth. One facilitator may be appropriate in some circumstances, but for most activities, at least two facilitators are present.
- In all circumstances, all facilitators must be engaged in the activities; taking a "break" or conducting other business during scheduled work-time involving activities with children is not permitted.

Rule of three policy/One-on-one interactions

The Mosaic Project's mandatory policy is to require that no adult or cabin leader ever be entirely alone with a student at any time. The goal of such a policy is to prevent the isolation of one adult and one youth, a situation that elevates the risk for child sexual abuse. However, when a one-on-one interaction between a child/youth and an adult becomes necessary (in the case of an emergency, an illness, or a disciplinary situation), that interaction must either occur in full view of others (for example, a disciplinary discussion may occur out of ear-shot of the group but must occur within the line of sight of the group) or must include another child/youth or another adult (for example, if an illness/injury must be attended to by an adult in the infirmary, another person- the child's teacher, the child's cabin leader, or another child - must also be present).

Risk of interactions between youth

The Mosaic Project's mandatory policy is to require that no cabin leader ever be entirely alone with a student at any time. Because all activities are group activities, this is rarely necessary. In circumstances where the cabin leader needs to be with a child apart from the group, another child must accompany them.

Out-of-program contact restrictions

There are two types of out-of-program contact restrictions. The first type involves the contact of youth with employees/volunteers outside the context of the program. The Mosaic Project prefers that all contact between employees/volunteers and youth be limited to organization-sanctioned activities and programs. In all cases where an employee, volunteer or cabin leader invites children/youth to an activity that is not an official Mosaic Project activity (for example, an individual's birthday party), clear notice must be given that this is not a Mosaic-Project activity and participation is unrelated to The Mosaic Project, which encourages parental notice of this fact as well.

The second type is contact between youth and people not affiliated with The Mosaic Project that occurs while youth are under our care. The Outdoor School restricts visitors to the program, and the site is not public, so access to children/youth is controlled by The Mosaic Project. Visitors are only allowed to observe and may never be alone with a child. The Youth Leadership Project does occasionally have outings to public places (ie performances, exhibitions, backpacking trips). In such circumstances, the activity leaders are required to monitor all interactions with people not affiliated with The Mosaic Project.

Caregiver information and permission

The Mosaic Project obtains addresses and contact information for youth and caregivers (i.e., parents and guardians). This information may never be released to unauthorized individuals. The Mosaic Project also obtains written permission from caregivers for children/youth to participate in all activities. Caregivers must be informed about what their children/youth will be doing and where they will be going.

Responsibility for youth

The Mosaic Project must always clarify with caregivers when it is responsible for youth and when caregivers are responsible, especially before and after activities officially begin.

III. Training about Child Sexual Abuse Prevention

Goal

To give people information and skills to help them prevent and respond to child sexual abuse.

General Principles

The Mosaic Project provides in-depth training to all facilitators and to all cabin leaders, before being allowed to work/volunteer at the Outdoor School. Each facilitator and each cabin leader is required to be retrained prior to beginning each new season (or academic year) with The Mosaic Project. Each facilitator and each cabin leader is provided with an in-depth manual addressing every aspect of their role at the Outdoor School, including prevention of child sexual abuse and other types of child abuse. Each facilitator and each cabin leader is required to read the entire manual, and training involves in-depth review and discussion of the manual, as well as applied learning.

Integration of content into the entire organization

- Ensure that training content is modeled by everyone in The Mosaic Project, from management to employees/volunteers to youth leaders.
- Training content should be evident in performance measures, supervisors' feedback to employees/volunteers, staff-to-staff feedback and observations, and treatment of youth.

Creation of a safe space

The Mosaic Project strives to create an environment in which all feel comfortable raising questions and concerns. Being receptive to questions reduces barriers to coming forward, reporting, and being proactive about preventing and responding to child sexual abuse.

Point of contact for child sexual abuse

- The Executive Director is designated as the point of contact for questions and concerns to ensure messages about child sexual abuse are communicated consistently.
- However, every employee/volunteer is still responsible for preventing and responding to child sexual abuse. Should anyone at any level in the organization receive a concern about possible child sexual abuse, that person is obligated to share that with his/her supervisor or the Executive Director.

Critical Content for Training Employees/Volunteers

All policies and procedures relating to the Outdoor School

Employees/volunteers, as well as cabin leaders are trained on all of the policies and procedures relating to the Outdoor School, including this document.

Child sexual abuse information

To prevent child sexual abuse, employees/volunteers need to understand general information about child sexual abuse (e.g., what child sexual abuse is, how often it occurs). The Mosaic Project:

- Provides a definition of child sexual abuse.
- Defines the continuum of appropriate, inappropriate, and harmful behavior from our perspective.
- Provides information about the prevalence of child sexual abuse.
- Describes risk and protective factors for victimization and perpetration.
- Addresses common myths about offenders, such as the myth that most people who sexually abuse are strangers to the youth.

Importance of preventing child sexual abuse

Employees/volunteers need to understand why they should be concerned with preventing child sexual abuse. The Mosaic Project:

- Emphasizes that employees/volunteers are an integral part of The Mosaic Project's efforts to create a safe, healthy, and respectful environment.
- Explains that child sexual abuse policies protect youth from sexual abuse, adults and youth from allegations of sexual abuse, and organizations from being accused of not doing enough to prevent child sexual abuse.
- Helps employees/volunteers feel comfortable and motivated to prevent child sexual abuse. For example, we provide employees/volunteers with information about preventing child sexual abuse and opportunities to practice how to handle situations (e.g., monitoring interactions).
- Gives employees/volunteers opportunities to ask questions and express concerns about child sexual abuse prevention.

Personal conduct

In addition to training on the elements of child sexual abuse prevention related to interactions between individuals, The Mosaic Project trains employees/volunteers on how to conduct themselves with youth and with other employees/volunteers. The Mosaic Project:

- Defines appropriate conduct.
- Describes how to deal appropriately with risky or compromising situations, such as romantic crushes of youth on employees/volunteers or of employees/volunteers on youth.
- Acknowledges the power differential between adults and youth and between youth leaders and youth.
- Inform employees/volunteers of their responsibility to act when they see or hear about inappropriate or harmful behavior.
- Emphasizes Positive Discipline in all our training.

Healthy development of youth

Employees/volunteers should learn about healthy youth development so they can (1) promote positive development in the areas of self-confidence, independence, and social interactivity and (2) understand and be aware of risk behaviors in which youth may engage. The Mosaic Project:

- Teaches employees/volunteers about healthy youth development and when certain behaviors are appropriate.
- Educates employees/volunteers about sexual development and how to distinguish between healthy and inappropriate or harmful behaviors when monitoring interactions.

Protective factors

Employees/volunteers should know that youth-serving organizations exist in order to provide a healthy and safe environment where youth can thrive. The very things that youth-serving organizations do may be protective against child sexual abuse. For example, close, caring, and connected relationships between youth and employees/volunteers can be extremely beneficial for youth development and can help youth feel supported and loved. This may protect youth from child sexual abuse. Because of the nature of the interactions in these relationships, however, they can also put youth at risk of being sexually abused by employees/volunteers. The Mosaic Project:

- Helps employees/volunteers learn to maintain a balance between providing a nurturing environment and working to prevent child sexual abuse.
- Assists employees/volunteers in learning to interact with youth with care and concern in order to foster youth development.

Handling disclosures

Employees/volunteers need to be able to respond appropriately to the person making the disclosure. The Mosaic Project:

- Teaches employees/volunteers what they should and should not say to a child/youth who is disclosing child sexual abuse.
- Instruct employees/volunteers to report sexual abuse allegations, suspicious, and disclosures to the authorities according to The Mosaic Project's policies.

Immunity and support for reporters

Employees/volunteers need to know whether they are immune from civil or criminal liability when making a required or authorized report of known or suspected child sexual abuse. This is addressed during training. We reassure employees/volunteers that they will be supported by The Mosaic Project and its leaders in their efforts to protect youth and that debriefing and/or counseling will be available to reporters and bystanders should abuse occur.

Training Youth

Child sexual abuse education and training for youth should be both developmentally appropriate and at the proper skill level.

Critical Content for Training Youth

Child sexual abuse information

The Mosaic Project:

- Provides general information about child sexual abuse, including what constitutes appropriate, inappropriate, and harmful behavior from adults and other youth. For example, youth need to know that no one has the right to force, trick, or coerce them into sexual situations and that sexual offenders, not their victims, are responsible for their behavior.
- Teaches youth how to interact appropriately with each other.
- Discusses the importance of reporting sexual abuse.
- Tells youth to whom they should report what they believe is inappropriate or harmful behavior.

Protective factors

There are factors that can help prevent youth from getting sexually abused or abusing. Youth should be educated about how they can make themselves and others safer. The Mosaic Project:

- Educates youth about the bystander approach. We empower youth to intervene or tell someone when they see inappropriate or harmful interactions between adults and youth or between youth. We encourage

youth to tell a trusted adult about inappropriate or harmful things that have happened to themselves or their friends.

- Empowers youth as partners in the prevention process. We encourage them to adopt healthy strategies to protect themselves, such as checking with a caregiver/adult before doing activities, going places with friends instead of alone, and identifying trusted adults.
- Educates youth about healthy sexuality. We teach youth to recognize appropriate behavior and to avoid exploitive or inappropriate behavior toward others.

IV. Monitoring Behavior

Goal

To prevent, recognize, and respond to inappropriate and harmful behaviors and to reinforce appropriate behaviors.

General Principles

Monitoring involves observing interactions and reacting appropriately. This includes both employee/volunteer–youth as well as youth–youth interactions. Youth leaders often require more supervision and monitoring because they are young, may lack judgment, and are harder to screen.

Monitor inappropriate or harmful behaviors

Employees/volunteers must understand the boundaries The Mosaic Project has established and identify when someone has crossed the line. Potential inappropriate behaviors include employees/volunteers showing favoritism, giving gifts, and looking for time alone with youth.

Monitor potential risk situations

Employees/volunteers must acknowledge that some situations pose more risk for inappropriate or harmful behavior than others. For example, interactions during the night or in the infirmary are harder to monitor than interactions during daytime learning groups.

Monitor appropriate behaviors

The Mosaic Project:

- Acknowledges, praises, and encourages appropriate behaviors.
- Rewards and reinforces positive interactions between employees/volunteers and youth.

Critical Strategies for Monitoring Behavior

Roles and responsibilities

All employees/volunteers should be responsible for monitoring behavior and interactions within The Mosaic Project's activities. Our in-depth training helps all staff and cabin leaders know how and what to monitor.

Responding to what is observed

The Mosaic Project must be prepared to respond to interactions among youth and between employees/volunteers and youth.

- Employees/volunteers should be prepared to respond immediately to inappropriate or harmful behavior, potential risk situations, and potential boundary violations.
- Supervisors need to redirect inappropriate behaviors to promote positive behaviors, confront inappropriate or harmful behaviors, and report these behaviors if necessary.

Reporting structure

If employees/volunteers or cabin leaders observe potentially inappropriate or harmful behavior, they may contact the Executive Director, or any staff member, who will then report it to the Executive Director. If the potentially inappropriate conduct involves the Executive Director, a report may be made to any board member. The Mosaic Project encourages people to question confusing or uncertain behaviors and practices.

Observation and contact with employees/volunteers

The Mosaic Project uses multiple monitoring methods to get a clear picture of how individuals are interacting, including formal supervision/evaluations and informal supervision, including regular and random observation (e.g., roving and checking interactions throughout an activity period).

V. Ensuring Safe Environments

Goal

To keep youth from situations in which they are at increased risk for sexual abuse.

General Principles

Environmental strategies will vary depending on the organization. Strategies will be different for organizations with physical sites (e.g., a day care, school), organizations with multiple sites for activities (e.g., some sports and recreation organizations), and organizations with leased or undefined space (e.g., mentoring organizations). The risk of the environment should be considered regardless of an organization's physical space. If an organization does not control its own space, back-up strategies should be used to ensure youth and employees/ volunteers can be monitored.

Critical Strategies for Ensuring Safe Environments

Visibility

The Mosaic Project program sites must be open and visible to multiple people.

The following methods increase visibility:

- Secure areas not used for program purposes to prevent youth from being isolated (e.g., lock closets and storerooms).
- There is a "no closed door" policy. Tent cabins have visibility from the outside during non-clothes-changing times. Classroom teachers are encouraged to observe cabin activities in the evening.
- Ensure that the site maintains bright lighting in all areas.

Privacy when toileting, showering, changing clothes

The Mosaic Project employs policies and procedures for reducing risk during activities such as toileting, showering, and changing clothes that consider not just the risk of employee/volunteer sexual abuse, but also the risk of inappropriate or harmful contact among youth. Cabin leaders must be present in the bathroom during showering and toileting (but each student maintains a visually-private space), to ensure the safety of all students.

Access control

The Mosaic Project monitors and controls who is present at all times at the Outdoor School.

- Arrival and departure from the Outdoor School is carefully monitored, as well as location of their group activities, so that youth's whereabouts are always known. A roster of participants and locations is

provided to each classroom teacher and staff person, and wrist bands are used for students, so it is easy to account for all students.

- Visitors are allowed in only with permission and supervision.

Off-site activity guidelines

The Mosaic Project has clearly-defined and communicated on-site and off-site physical boundaries for its Outdoor School.

Transportation policies

The Mosaic Project is not responsible for transporting children to and from the Outdoor School. Youth Leaders are responsible for providing their own transportation. The Mosaic Project may assist with arranging carpools, but caregivers are still responsible until the youth are onsite. In off-site Youth Leadership Project activities, The Mosaic Project clearly communicates with caregivers about who is responsible for transportation and when The Mosaic Project begins/ends its responsibility for youth.

VI. Responding to Inappropriate Behavior, Breaches in Policy, and Allegations and Suspicions of Child Sexual Abuse

Goal

To respond quickly and appropriately to (1) inappropriate or harmful behavior, (2) infractions of child sexual abuse prevention policies, and (3) evidence or allegations of child sexual abuse.

General Principles

The ultimate aim of child sexual abuse prevention efforts is to prevent child sexual abuse from ever occurring; however, we need to communicate clearly what to do if policies are violated or if child sexual abuse occurs.

Define inappropriate and appropriate strategies

The Mosaic Project:

- Clarifies that it is not the role of an employee/volunteer or The Mosaic Project to evaluate or investigate an allegation or suspicion.
- Lets Child Protective Services, law enforcement, and child advocacy centers investigate allegations or suspicions.
- Knows that an organization's investigation can harm the youth or the legal investigative process.

Critical Strategies for Responding to Inappropriate Behavior, Breaches in Policy, and Allegations and Suspicions of Child Sexual Abuse

What to respond to within the organization and what to report to the authorities

As discussed previously, it is often difficult to find the balance between being vigilant and protective of youth and being so hyper-vigilant that the positive parts of programs (e.g., relationships between adults and youth) are lost. In responding, the need for this balance involves recognizing the tension between over-reacting and under-reacting, the Mosaic Project:

- Defines the continuum of appropriate, inappropriate, and harmful behavior.
- Delineates what behaviors we will respond to internally and what behaviors will require reporting to the authorities. For example, if a youth tells a sexually risqué joke, we may inform a direct-line supervisor and/or the youth's caregiver; provide the youth with guidance, redirection, and instruction; and/or file an

incident report. However, if a youth or employee/volunteer forces sexual contact with a youth, this violation should always be reported to the appropriate authorities.

- Acts on infractions of our child sexual abuse prevention policy. If an employee/volunteer has breached a policy, The Mosaic Project must take action, even when child sexual abuse is not suspected. The consequences of violating policies should be explicit and violations should be addressed immediately. However, if abuse is suspected, it must be reported to authorities immediately.
- Report when an employee/volunteer witnesses or learns about sexual abuse of youth by any of the following individuals:
 - Volunteer/employee.
 - Another youth within the organization.
 - Someone outside of the organization (e.g., caregiver).

Reporting process

If evidence of child sexual abuse has surfaced or an allegation producing reasonable suspicion has been made, a formal report needs to be made to outside agencies, including both Child Protective Services and law enforcement.

- The Executive Director will make all reports as required, unless the Executive Director is the subject of a report, in which case the Board President will report to outside agencies.
- Allegations and suspicions should be reported to very few people inside the organization before authorities are contacted to expedite the process and minimize the number of times a youth has to repeat allegations.
- The Mosaic Project does not conduct our own investigation, but depending on the circumstances, it may be appropriate to ask a few clarifying questions of the youth or the person making the allegation to adequately report the suspicion or allegation to the authorities.

Internal records

Although The Mosaic Project will not investigate allegations or suspicions of child sexual abuse in lieu of reporting them to the authorities, we do have a system to track allegations and suspicions of child sexual abuse cases. The Mosaic Project:

- Includes child sexual abuse as a category on general incident reporting forms for significant physical injuries. These forms will be completed by employees/volunteers who first learn of the abuse through hearing an allegation or making an observation.
- Refers child sexual abuse reports to the Executive Director, for the purpose of reviewing the organization's procedures. The Executive Director will do an incident review after each allegation to determine what went wrong and how a similar scenario can be prevented in the future. For example, was a policy or a step in a policy not followed? How can policies be modified to prevent another occurrence?
- Records the resolutions of child sexual abuse cases.

Confidentiality

Because of the sensitive nature of child sexual abuse cases, we will withhold the names of potential victims, the accused perpetrator, and the people who made the report to the authorities. The Executive Director will decide whether to inform the community that an allegation has been made and will serve as spokesperson.