

AN INDEPENDENT REVIEW:

Kanakuk Child Protection Plan

July 26, 2022

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EXECUTIVE SUMMARY

More than 12 years ago, a Kanakuk Ministries (DBA Kanakuk Kamps) (“Kanakuk”) director was accused and convicted of abusing children.¹ He was arrested in 2009, and another perpetrator was apprehended in 2011 for similar criminal activity as a counselor on staff.² Kanakuk claims that these are the only two incidents of abuse by Kanakuk personnel.³ In fact, there have been multiple reported incidents.⁴ A few of these incidents resulted in criminal convictions, accompanied by increased media attention.⁵

In response to the crimes that took place on its properties and through affiliated events/entities, Kanakuk developed the Kanakuk Child Protection Plan (“CPP”). As described by Kanakuk, the plan has “over 340 identifiable and measurable protective elements.”⁶ The CPP – not publicly available in its entirety – has been shared with, adopted by, or used as training material for over 600 youth-serving organizations.⁷ It is – according to Kanakuk – recognized as the “gold standard among camps, churches and other youth-serving organizations.”⁸

In light of Kanakuk’s demonstrated efforts to improve and replicate its child safeguarding practices since staff arrests, it is important to understand if the CPP is thorough, professional, and up to international standards for the protection of children. With this interest in mind, in May 2022, two independent child protection and safeguarding experts were commissioned to review the CPP and certain related documents. The experts were tasked with reviewing the 2019 and 2022 versions of the CPP and asked to provide a swift independent analysis.

Among other key findings, the experts conclude that both versions of the CPP are insufficient and inadequate.

Key Findings Include:

- Unclear Applicability and Scope Statements. The scope of both versions of the CPP is unclear due to the omission of one main list of individuals that should be bound by the CPP. All individuals who visit or are contracted with the camp should be required to be trained on and abide by a CPP.
- Contradictory Key Definitions. While a glossary of definitions is provided, there are multiple versions of these definitions throughout the CPP, making them unclear. Consequently, the procedures and concepts that utilize unclear definitions are also unclear.

¹ *Our Response*. (n.d.). Kanakuk. Retrieved June 6, 2022, from <https://kanakuk.com/our-response/>

² News-Leader, S. (2012, April 3). *Update: Missouri Kanakuk Counselor charged with sexual abuse*. Columbia Missourian. Retrieved June 6, 2022, from https://www.columbiamissourian.com/news/update-missouri-kanakuk-counselor-charged-with-sexual-abuse/article_eb30b7cd-c42b-548f-beb0-d79fadadb88.html

³ *Our Response*. (n.d.). Kanakuk. Retrieved June 6, 2022, from <https://kanakuk.com/our-response/>

⁴ French, N. (2022, May 27). *Survivors, ex-employees say Kanakuk Christian camp ‘ministered’ to its sexual predators*. Retrieved May 30, 2022, from <https://www.usatoday.com/story/news/investigations/2022/05/27/sex-abuse-kanakuk-christian-camp-missouri-peter-newman/9907577002/>

⁵ *News*. (n.d.). Facts About Kanakuk. Retrieved July 25, 2022, from <https://factsaboutkanakuk.com/news/>

⁶ *Our Response*. (n.d.). Kanakuk. Retrieved June 6, 2022, from <https://kanakuk.com/our-response/>

⁷ About Us. (2022, April 19). Retrieved June 6, 2022, from <https://kanakukchildprotection.org/about-us/>

⁸ Summer 2021 faqs_covid. (2021, March 19). Retrieved June 10, 2022, from <https://kanakuk.com/summer-2020-faq/>

- Inappropriate Inclusion of Key Definitions. Some definitions that are included do not belong in a document purported to safeguard children. “Claims Made,” for instance, and any and all references to insurance concerns, are terms related to risk mitigation for and protection of an organization/institution (not children); their inclusion in a CPP is irrelevant and inappropriate.
- Omission of a Clear Reporting Framework. A clear reporting framework is missing from the materials provided. Consequently, the reader is left uncertain as to whom a report should be made, and how that report will be managed, as many examples of different reporting options are provided.
- Omission of Relevant National Legislation. Relevant national legislation is left out from the materials provided. Child safeguarding policies should reference all applicable and relevant legislation.
- Omission of Plan Evaluation Details. How Kanakuk will measure progress and improvement is unclear. A concise policy statement is absent. As such, the reviewers question the efficacy and impact of the CPP. This is particularly true in the absence of a Kanakuk commitment to periodic external audit and ongoing review of the CPP.

Overall, the CPP is unclear and convoluted. Moreover, it introduces terminology that has neither scientific nor practical basis. For a policy that should be easy to understand – by children and adults alike – the opposite holds true. Additionally, the CPP appears to be a “catch all” for other required policies and guidance. As such, it is unnecessarily cumbersome.

While all efforts to keep children safe from harm and crime are laudable, the reviewers suspect that, if officially audited, the CPP – both versions – would fall short of its stated goals.

ABOUT THE REVIEWERS

Dr. Susan L. Bissell

Dr. Susan Bissell has been working in the field of child protection since her first association with the United Nations Children’s Fund (UNICEF) in 1987. Her career with the United Nations spanned three decades and several continents, culminating with Dr. Bissell’s appointment as UNICEF’s Chief of Child Protection, the organization’s global lead on child protection. From this position, she served as the founding director of the Global Partnership to End Violence Against Children and its associated trust fund. Grounded in both her field and her academic work, Dr. Bissell is an esteemed expert in justice for children, child trafficking and labor, child sexual abuse and other forms of violence, children affected by armed conflict, justice for children and child safeguarding. Now a Senior Fellow and Visiting Scholar at the Harvard T. Chan School of Public Health, Harvard University, Dr. Bissell is writing, mentoring, consulting and serves on a number of Boards.

Dr. Bissell obtained her first two degrees from the University of Toronto, and her PhD in Public Health and Medical Anthropology from the University of Melbourne.

Sarah J. Stevenson

Ms. Sarah Stevenson is one of the world's leading experts in child safeguarding. She has been at the helm of international efforts in the fields of child participation and the protection of children from all forms of violence. Ms. Stevenson has more than 25 years of experience in the safety and protection of children and led the development and implementation of child safeguarding policies at several leading international organizations for child rights. At the Global Partnership to End Violence Against Children, Ms. Stevenson oversaw grantees child safeguarding efforts, including review of policies and procedures and, as required, support of efforts to strengthen child safeguarding capacity. As an independent consultant, Ms. Stevenson has advised international organizations, non-governmental organizations, private entities, sports bodies and foundations in their child protection efforts.

Now based in New York, Ms. Stevenson obtained her bachelor's degree at Western University (Canada), and her MSc in Social Policy and Planning at the London School of Economics and Political Science.

SCOPE OF ENGAGEMENT

The review was commissioned by a children's rights advocate who requested to remain anonymous due to the sensitive nature of the Kanakuk abuse controversy. Consultants were provided with the 2019 version of the CPP for review, together with the 2022 Letter to Parents. Subsequently, the CPP 3.1 workbook revision 4.1.2022 was shared for further analysis.

The review was conducted strictly as a desk review; no interviews were conducted. Moreover, the reviewers offer no comments on the historical convictions and allegations of abuse; the focus is strictly on the materials referenced above.

The review was conducted with full independence and was written without any undue influence; the findings herein are solely those of the reviewers.

In certain parts of this report, the reviewers recommend that Kanakuk seek external professional advice. To avoid any conflict of interest the authors of this report will not seek or accept any such business with Kanakuk.

ABOUT CHILD SAFEGUARDING POLICIES AND PROCEDURES

The duty-of-care for a child that is accepted by a camp or other youth-servicing organization is a significant responsibility. It is a responsibility bestowed by a child's parent or legal guardian, governed at the state and federal levels by relevant legislation. At the level of a children's camp, the responsibility should be appropriately acknowledged and delineated in a safeguarding policy with relevant accompanying procedures.

When adults, who inherently have power over children, are given unfettered access, some will abuse

children. This knowledge is based on experience with churches and other houses of worship,⁹ sports settings,¹⁰ scouting,¹¹ educational institutions,¹² and camps¹³. Given the number and nature of abuse allegations in these settings, child safeguarding efforts are critical and rising in prevalence.

While there are variations in policy and practice, professionals recognize that child safeguarding – with procedures – should include a specific set of information. This information needs to be provided in simple language with clarity about who is responsible for safeguarding, what actions need to be taken to prevent and respond to incidents, and how the safeguarding policy will be fully implemented. Any person encountering a children’s camp – from parents to campers to staff to visitors – needs to understand what safeguarding is and what is expected of them regarding the camp’s expectations for safeguarding children under their duty-of-care.

As any child safeguarding policy intends to safeguard minors, a child-friendly version of the policy should be available. Children need briefings on what they can expect from adults associated with the organization. If a policy is operational across jurisdictions that have different statutory reporting requirements, the policy should be localized with this information. Parents and legal guardians should receive direct information about the policy and procedures. The full policy should be publicly available on the organization’s website.

As the goal is to have people understand what is expected of them and to function as required, documents should be written in a concise and clear manner. Documents should not be complicated or intimidating, and topics that fall outside the explicit purpose of the policy should not be in a child safeguarding policy. This does not mean that additional and/or related documents should not exist altogether. Rather, they should not be included in a child safeguarding policy itself.

An organization should have its child safeguarding policies evaluated by a professional third party on a regular basis. The external review process is essential for an organization to learn about the effectiveness of its policy and related procedures. Such reviews should be conducted on a regular basis and should be executed by professionals. Reviews not only reveal shortcomings, but they can also provide recommendations for updates and changes relative to current legislation.

OBSERVATIONS

The reviewers evaluated both the 2019 CPP and CPP 3.1 workbook revision v 4.1.2022. While the 2022 version of the CPP includes important improvements when compared to the 2019 version, the policy still

⁹ Guidepost Solutions. (n.d.). Report of the Independent Investigation. Retrieved June 5, 2022, from <https://www.documentcloud.org/documents/22031737-final-guidepost-solutions-independent-investigation-report?responsive=1&title=1>

¹⁰ Chen, D. (2022, May 11). His report of abuse drew ridicule at first. Years later, a jury listened. Retrieved June 10, 2022, from <https://www.nytimes.com/2022/05/11/sports/abuse-tennis-verdict-marin-county.html>

¹¹ Boy scouts reach \$850 million settlement with tens of thousands of sexual abuse victims. (2021, July 02). Retrieved June 2, 2022, from <https://www.nbcnews.com/news/us-news/boy-scouts-reach-850-million-settlement-tens-thousands-sexual-abuse-n1272955>

¹² Nir, S. (2021, December 08). School District investigates claims of longtime sexual misconduct by teachers. Retrieved July 25, 2022, from <https://www.nytimes.com/2021/12/08/nyregion/babylon-high-school-teachers-allegations.html>

¹³ Dastagir, A. (2022, January 15). 'the most intense violation of my life': A beloved camp, a lost boy and the lifelong impact of child sexual trauma. Retrieved July 25, 2022, from <https://www.usatoday.com/in-depth/life/health-wellness/2022/01/10/summer-camp-child-sexual-abuse/8650964002/>

falls short as an effective tool for safeguarding children in the care of Kanakuk.

There are problems in the details of the plan and with the general approach. There is no policy statement outlining Kanakuk's commitment to safeguarding children. The purpose of the CPP is not always clear. It seems, on one hand, to be a policy and procedure manual. On the other hand, it seems like a platform for training other organizations.

The CPP appears to be both a document about safeguarding children and also about protecting Kanakuk from the consequences of lawsuits. The former of these two objectives ought to be the singular aim of a Kanakuk child safeguarding policy. Instructions on insurance, for example, have no place in a policy intended to keep children safe from harm and criminal actions.

I. INFORMATION MISSING FROM THE CPP

a) Standard Scope

The scope of the CPP is missing two standard aspects that are critical for an effective child safeguarding policy: 1) an inclusive list of people who must abide by the CPP; and, 2) key definitions that are found in all child safeguarding policies.

b) Relevant National Legislation

Relevant national legislation is absent from the CPP. While references to state legislation are present, they are minimal and insufficient. Legal frameworks and their enforcement are critical to a safeguarding policy. Among other things, these frameworks signal the grounding of the policy in law and justice to all involved in implementing the policy. Child safeguarding in a camp setting is neither an optional nor amateur endeavor.

c) Public Disclosure of Development and Approval Processes

A public disclosure regarding the development and approval of the CPP is absent. Such public disclosures are included in effective policies so that all parties impacted by the CPP understand its governing authority and credibility. While various processes exist, a prominent official or Board Member(s) often approves a safeguarding policy in accepted standard practice.

d) Clear Reporting Framework

A clear reporting framework is absent from the CPP. Due to this omission, it is impossible to determine how progress on the implementation of the CPP will be measured.

e) Framework for Review of the Policy

Details regarding how and when the CPP is reviewed are absent. Effective policies include a schedule for review, mention of the periodicity of review cadence, and a detailed description of the review process.

f) Comprehensive Child-Friendly Version

A child-friendly version of the CPP should be supplied to campers, explaining not just the rules campers must follow, but the rules that govern adults at the camp. While the CPP provides

evidence that there is some sharing of information with children to equip them with the knowledge of what they should expect from personnel, the full child-friendly version should be available and included within the CPP.

g) Whistleblowing Policy

A Whistle Blowing Policy is not included, which is a vital tool for encouraging reporting.

II. CONTRADICTION ASPECTS OF THE CPP

a) Non-Linear Procedures

Procedures should accompany any safeguarding policy. They should clarify exactly how the organization will achieve specific outcomes. Procedures indicate what should be done, by whom, and when, in relation to the safeguarding policy. In the case of Kanakuk, while sections of the CPP are procedural, these are mixed with policy. Accordingly, the document contradicts itself and is confounding.

b) Focus on Institutional Safeguarding

A significant portion of the CPP includes informational policies and procedures for safeguarding an institution (and not children). There is extensive information on insurance issues and topics appropriate to HR departments and administrative matters. Some of these items may be important for protecting the camp from liability claims, but they are not directly on-topic for safeguarding children and should be dealt with in a separate policy or training.

Not only is the inclusion of this information inappropriate due to its irrelevance, it also contradicts the CPP's goal of protecting children in two significant ways:

- i. Diluting the Importance and Goal of Protecting Children. The incorporation of irrelevant information and policies distracts from the critical policies and procedures that focus on what should and should not be permitted in the presence of children, and dealing with incidents or suspicions of incidents. As a result, the policies dedicated to protecting children are diluted and the implementation of the CPP may focus more on institutional safeguarding than child safeguarding;
- ii. Counteracting Child Safeguarding. Whereas a youth-serving institution and the children attending a youth-serving institution's programs have conflicting interests, efforts made to protect an institution in the prevention of or response to child abuse can (and often do) directly counteract child safeguarding. This counteraction commonly occurs during a response to an incident of child abuse. Institutional safeguarding prioritizes the preservation of organizational reputation and finances, while child safeguarding prioritizes trauma-informed care and survivor-centric public narratives, which are often very costly to an institution, both in terms of finances and public standing.

c) Contradictory Key Terms

The Scope includes multiple definitions for several key terms. There are also many examples where various irrelevant key terms and definitions were wrongfully included, such as those pertaining to insurance matters.

d) Contradictory Resources

There are multiple examples where information that is either photocopied or taken from other organizations has not been contextualized for this CPP. As a result, conflicting information is often provided on key topics and procedures.

e) Combination of Policy and Training Tool

The CPP is not consistently written as a safeguarding policy. It is sometimes written as a policy for Kanakuk and other times written as a training tool for other organizations. As a result, the document is unclear and much longer than is necessary.

In order to be effective as a policy for Kanakuk, the CPP should be written with the sole intent of safeguarding children at Kanakuk. If desired, training tools for other organizations should be developed as an entirely separate set of materials.

Due to the inclusion of training tools for other organizations throughout the CPP, it lacks a concise and easy-to-understand Policy and Code of Conduct that can be given to, and signed off by, each staff member, volunteer, or tradesperson with permission to enter the camps. The procedures should be shared with staff, depending on their roles, and should be the basis of any training they receive.

f) Use of Non-Standard Terminology

Latin terms and non-standard uses of terminology make the policy difficult to read and understand, both for experts in child safeguarding and for the general public. Some of the terminology is outdated and conflicting. Other words and titles are unconventional in the well-developed field of child safeguarding, due to their invention by the author(s) of the policy. The inclusion of non-standard, outdated and newly invented terms confuses the reader and, in some cases, contradicts commonly accepted, trauma-informed language.

III. OTHER ASPECTS OF THE CPP THAT FAIL OR FALL SHORT

a) Unclear Reporting Procedures

Reporting procedures, as written, fail. These procedures do not require that Kanakuk notify external authorities at the appropriate time. The Addendum E.3 options for Reporting Abuse includes a generic "Your Organization" at the top of the page, with three options. For a staff member of Kanakuk, this creates confusion about who reports and how reporting should occur. In such instances, suspicions are more likely to go unreported.

Reporting procedures also conflict with each other with respect to titles and roles. Confusing information about reporting is likely to discourage rather than encourage the reporting of suspicions.

b) Outdated Links & Information

Some sections of the CPP include dead links, links to non-useful resources, outdated documents and references to resources that might be valid in the jurisdiction of a specific camp but not in others.

c) **Wrongful Permission of Child Contact Outside of Camp**

As stated in the CPP, there are strict requirements for no one-on-one contact while at camp. Alongside this, there are references to rules for contact between staff and campers outside of the camps. Contact between campers and staff/volunteers outside of camp should be strictly forbidden.

d) **Incorrect Information on Confidentiality and Disclosure**

The policy contains incorrect information about confidentiality and what must be disclosed to authorities due to mandatory reporting laws. Proper and thorough information is critical in order for any reports to be handled appropriately and effectively.

e) **Inadequate Application**

Another error in the CPP is in its application. Safeguarding standards and practices should apply to all. As presented in the CPP, some rules only apply to paid, full-time staff (or for staff above a certain "Threat Level Score"). When at an overnight camp, all staff should be subject to the highest level of safeguarding requirements – from recruitment to training. The CPP should also explain the methods by which staff, volunteers and others will be trained on safeguarding standards.

f) **Lack of Policy and Procedures for Non-Sexual Forms of Abuse**

The training and the CPP itself should comprehensively cover all forms of abuse, including but not limited to sexual abuse.

CONCLUSION

The purpose of a child safeguarding policy and accompanying procedures is to succinctly explain what an organization is doing to prevent harm to children during their engagement with the organization and to discover and remedy harms that have occurred. It needs to clearly demonstrate what is meant by child safeguarding, who is covered under the policy and how it will be implemented to prevent harm to a child and respond when a harm occurs.

The Kanakuk CPP, in the opinion of the reviewers, is not providing the clear guidance required to keep children safe. There is inconsistency of definitions, the absence of a policy statement and lack of a clear explanation of who is impacted by the policy. There are multiple versions of a Code of Conduct, a document that should singularly and clearly state how the camp expects personnel to behave. There is no Whistleblowing Policy, a tool used to encourage the reporting of suspected cases. The policy and procedures also give multiple titles and roles to a crucial position – that of the designated safeguarding officer. Moreover, how – and to whom – suspected cases are to be reported also lacks clarity.

It was unclear to the reviewers whether this CPP was intended solely for people associated with Kanakuk, or if it was also the basis of training other organizations.

RECOMMENDATIONS

The reviewers, based on the informal review of available documents, have recommendations for Kanakuk to strengthen its ability to provide the necessary duty-of-care to children:

1. Undertake a formal independent review of the Kanakuk CPP 3.1 workbook revision 4.1.2022 and all Addendums. This should include formal training materials;
2. Undertake an audit by trauma-informed experts to review cases of abuse with the option to interview witnesses and survivors who volunteer to engage. Necessary support to both witnesses and survivors would need to be made available, resourced by Kanakuk;
3. After making any necessary revisions to the CPP, a new training program should be developed. One option for consideration is a mandatory basic training to be available online that anyone visiting the camp or associated with the camp must take as a contractual obligation. A more detailed, in-person training for all camp personnel with a separate training focused on governance for Board Members and Executives should also be developed and executed.
4. Review the child safeguarding policy and procedures at minimum every three years. This review should be conducted by external experts. Ongoing, internal review and modification of efforts to safeguard children are key to any successful safeguarding policy, including consulting with campers.

ADDENDUM

This is an excerpt from a detailed review commissioned for our independent analysis of the Kanakuk CPP.

I. SUMMARY

The purpose of safeguarding policy and procedures is to succinctly explain what an organization is doing to prevent harm to children during their engagement with the organization. It needs to clearly show what is meant by safeguarding, who is covered under the policy, and how it will be implemented to prevent harm to a child and respond when harm occurs. After reviewing the Child Protection Plan (“CPP”) of Kamp Kanakuk (“Kanakuk”), the reviewers assert that the documents are not providing the clear guidance required for anyone who reads it. This is largely due to inconsistent definitions and the absence of a policy statement. The CPP lacks a clear explanation of who is impacted by the policy. The policy and procedures give multiple titles and roles to a crucial role – that of the designated safeguarding officer. This ends up being very confusing. Moreover, there is inconsistent information about how — and to whom — suspected cases are to be reported.

There are several documents and information included in the CPP that should not be included. One example is information regarding insurance. This should be found in an operations policy but is distinct from what should be the singular focus of a safeguarding policy – keeping children safe from harm and crimes. One is left wondering whether the CPP is really a training tool solely for Kanakuk resulting from a true desire to protect children, or if it is a generic training resource used for multiple types of settings. Throughout the CPP there are bits and pieces of a Code of Conduct. However, a comprehensive, clear Code of Conduct is not found anywhere in the documentation. There is something called the Kanakuk Kamps Conduct Guidelines which was found on the website; however, this was not included in the CPP 3.1.

There are numerous references to no one-on-one time between adults and campers which is standard, but then the CPP encourages communication, albeit under parents’ supervision, between campers and counselors throughout the year. There is no reference to a Whistleblowing Policy; in fact, the opposite holds true. The CPP seems to dissuade individuals from reporting by emphasizing the consequences for false reporting. Encouraging reporting should be a priority, and protections for those who report is crucial to this objective. The CPP has numerous Addendums, some of which are simply documents taken from other sources and not tailored to this CPP, often creating conflicting messages. There are also some key tools missing, notably a risk assessment template and communications “dos and don’ts” relative to safeguarding children, including use of their images, etc. online.

The 2022 letter to parents gave the reviewers some hope that changes to the 2019 CPP occurred, at least on paper. However, once the reviewers accessed and reviewed the CPP 3.1 workbook revision 4.1.2022, they concluded that not enough has been altered to improve the reviewers’ opinion of the 2019 CPP. The reviewers therefore recommend to Kanakuk leadership that they begin anew with the development and implementation of a child safeguarding policy. A simple set of policies and procedures are required. Resources should be allocated to support a widespread adoption and implementation of a new CPP, complete with clearer and more straightforward policies and procedures.

II. COMPARISON OF 11.1.2019 CPP AND 4.1.2022 CPP

The reviewers offer fourteen specific comments on the 2022 CPP, as against the 2019 CPP:

1. Overall, CPP 3.1 workbook revision 4.1.2022 is the same as the earlier 11.1.2019 rendition with minor modifications and includes additional information at the beginning of the CPP. The Addendums have mostly remained the same. When updating a policy, it is good practice to also review the Addendums.
2. A copy of a letter from 2013 signed by Attorney General John Ashcroft is now included. Given that the letter is now almost a decade old, the appropriateness for the inclusion of this letter is questionable.
3. A review must occur on a regular basis and needs to be indicated in the CPP.
4. Quizzes, as found in the latest CPP, are good tools to assess the understanding of trainees. Accurate responses to questions posed should always be provided. Trainees should not be searching for answers given that there is a plethora of unreliable sources. Good practice suggests that correct information is provided to trainees before a training, and thereafter a quiz can be useful to determine comprehension, and over time, retention of information. Refresher training accompanied by quizzes or questionnaires would be ideal. They would also reveal modifications required for the training to render it more effective.
5. There are new graphics which need to be clearer and not left open to self-interpretation.
6. Having a goal for the CPP is helpful. "Recognize, Resist and Report" are three actions that may contribute to the realization of a goal, but they are not a goal in and of themselves. These are also mentioned in the CPP as the "3 Rules." Added to the multiple goals listed within each section of the CPP, one is unsure of the overall goal of Kanakuk's child safeguarding work.
7. The Kanakuk Abuser Threat Indicator is overly complicated. This includes "levels" assigned to specific roles within the organization to indicate which roles require which level of training, background checks, and references, for instance. As this is an overnight camp situation, everyone living at the camp has potential access to children. Therefore, all roles must have a "high level" assigned to job descriptions. The examples of positions cited in the CPP include ones from outside the camp setting. This is confusing. Assuming the CPP is specific to Kanakuk, roles such as a "Principal" should not be referenced in the document.
8. As mentioned, the Addendums have not changed significantly from the 2019 CPP. The Kanakuk Director CPP Checklist has changed. Note this was updated from the 2019 version (page 116) but was NOT updated in the 2022 version (page 124). This updated version is clearer than the previous versions. However, a yearly review needs to include a risk assessment that should also be audited throughout the year. The risk assessment should be a living document.

9. Staff documentation should include the signed "staff commitment" to training, together with a full list of training received. The Administrative Section would be clearer if there were clarity on the reporting protocols.
10. It is unclear whether the new Kanakuk 1-800 number is posted; and if so, where it is posted/publicized, as it is not referenced in the CPP itself. Who is managing the phone lines and the response protocols?
11. Clarity is also lacking with respect to the readiness of a concise CPP and Code of Conduct. This should be made available and emailed to all visitors before arriving at Kanakuk.
12. The Daily Checks/Reminders are a useful tool.
13. Other modifications to the CPP include Section B, with missing information in B1.2 and B2. This may be the result of a design flaw. Section D refers to training on the Staff Code of Conduct, reporting and Child Abuse Awareness for only certain unpaid staff and all paid staff. Everyone on-site should be trained.
14. As this CPP is an updated version, it is odd not to see the 2022 parents' letter included. The reviewers were pleased that Section F no longer references "Follow Insurance Claim Protocols to reduce the likelihood of large claims." This phrase suggested the CPP intended to protect the camp rather than the minor campers.

III. DETAILED REVIEW OF KANAKUK CHILD PROTECTION PLAN (CPP)

Glossary

The purpose of a glossary is to provide definitions of terminology that a reader may not be familiar with, related to the topic, in plain language. The definitions should be grounded in other documents or have legal standing. The CPP glossary does not help the reader understand important terminology necessary for them to understand child safeguarding. Some of the terms that should be included in a glossary are safeguarding, child abuse, child sexual abuse, commercial or other exploitation of a child, contact with children, emotional abuse, neglect, and physical abuse, amongst others. An important definition is the term used to describe everyone who falls under the policy. Associate is often used to include, staff, volunteers, consultants, members of the governance, etc.

The definitions that are included in the CPP under review are worrisome. **Claims made** is about insurance and does not belong in a child safeguarding policy. It is an example of a section that could be placed within another policy.

Dead Zone and EYE-SHOT THEORY are examples of terminology that are not in common usage, nor do they have legal meaning and therefore, only make the document harder to understand. Complexity and confusion are created by the use of these concepts.

Page numbers

With any document of this size that requires the reader to constantly jump from page to page, accurate page numbers are important. The 2022 version of the CPP does not bother to update the page numbers within the CPP. Each section has examples of non-aligned page numbers. For example, A.1 Insurance Terminology is listed as being on page 23 in the CPP. According to the Addendum Index it is page 29. However, as the Addendum Index is listed after the documents are referenced, it is not particularly helpful. It would be helpful to have correct page numbers within the CPP itself. Note that page numbers referenced in this review are from the 2019 CPP.

Review of the Policy

The 2019 version of the CPP states that the policy was revised in 2019. There are numerous examples of pieces of the policy that were not updated in 2019. There is no indication of when the next review will occur. Neither does one know against what criteria the review was/will be reviewed, or who will be doing the reviewing. An independent, external, expert review should be required — even review by a statutory body would be excellent.

The 2022 version has the new revised date of 4.1.22 at the top of each page, but as the vast majority of the Addendums are not updated, they are even further dated documents. For example, Addendum C.4a *Guidance for Camps and Other Youth-Serving Organizations Developing Criminal Background Thresholds* is from the American Camp Association and noted as the updated January 2012 version. The American Camp Association has a 2018 version available on their website. Why is the latest version available not included?

Responsibility

It is unclear who is accountable for the policy. This should be either a Board Member or an Executive Officer. There should also be a focal point for safeguarding. Throughout this document, that focal point is referred to by many titles and different roles within the organization including Safety Officer, Safety Manager, Certified Operator and Director of Risk Management. This leads to confusion.

The way presently indicated, the camp director has roles as investigator, reporter, Judge, and jury. This is highly problematic.

Legal Frameworks

Throughout the document, there are examples of legal frameworks, from Missouri and Texas. Relevant national legislation is not cited. It is common for an organization to have multiple areas of jurisdiction. The normal way of approaching this is for the policy to state “as per national and local legislation” and for the policy to require there be a localized framework for reporting that meets those requirements.

A: Operational Support

A1 - Goal: To provide financial assistance for claimants and to protect the organization from uninsured loss.

The first goal(s) of a policy **should be** to prevent harm to children, act when it does occur and provide remedy. This emphasis on insurance is inappropriate for the CPP.

Other points within Section A, in addition to the fact that this section as written should not be included in a child safeguarding policy are:

- Sexual Abuse and Molestation (SAM) is not defined.
- Victim Form and Perpetrator Form are unclear and, again, not about actually safeguarding children.
- The first Addendum, Insurance Terminology (page 23), should not be included in a safeguarding policy or procedures.
- E&O Certificate of Insurance (example) (page 25) is simply a photocopy of a certificate of liability insurance.

A2 - Goal: To provide awareness of our intent to recognize and report child abuse

- Posting the National Child Abuse Hotline in plain sight within the business office of each location is fine but not ideal. This third-party hotline information should be accessible to everyone involved in the camps, including campers and their parents and caregivers. This is another an example of an inconsistency within the CPP. On the website, Kanakuk states that the hotline number will be accessible to staff, campers, and visitors. There is also the additional mention of the Kanakuk hotline but the reviewers are unclear by whom and how that line is managed.

A3 - Goal: To keep the organization updated on changes to state laws concerning minors

- Conducting a yearly review of all state-level child abuse and neglect laws in all jurisdictions where the camp is operating is a good idea. That review should be accessible to all within the camp context as part of a training, including for families and care givers upon request.
- The example of Missouri Child Abuse and Neglect (page 26) does not include a date. The definitions are helpful and would be good examples to include in the CPP. Other information in this section goes beyond what needs to be included. A number of the items listed are the responsibility of the management, overseen by the governance of the camp. They are not the responsibility of personnel expected to abide by safeguarding policy and procedures. For example, see *Persons or Entities Allowed to Access Records* or *Use of Records for Employment Screening*. What would have been more helpful is to include only the information that applies to personnel covered under the policy. Other information can be held within different policies outside the scope of this document.
- The link at the top of the page is no longer active. *"The page you are looking for either does not exist or is no longer available."*¹⁴ This is always a risk when including links.

A4 - Goal: To provide access to historical documents should allegations arise

- Archiving documents in some instances is fine. However, some of these files need to remain confidential and protected. For instance, see the *Youth Incident Reports involving abuse* and the *Staff applications related to allegations of abuse*. Does Kanakuk have a data protection policy to ensure the safety of such documents?

¹⁴ http://www.childwelfare.gov/systemwide/laws_policies/state/. Retrieved May 16, 2022.

- The State-by-State Statute of Limitations (page 31) does not belong within a child safeguarding policy. This information should be held by the safeguarding focal point. This is another example, though, of the inclusion of a photocopy of an irrelevant document. There is again no date and no sourcing information if the reader wishes to locate an up-to-date version. The footnote at the bottom makes it clear that this document was written to protect the camp, not the children:

****NOTE: States shown in BOLD and ITALIC are "high risk" states*** "High Risk" States are states that have an extended period of time after discovery (6+ years), allow for repressed memory, or have legislature pending that would significantly worsen the current statute of limitations.*

B: Grounds & Facilities

Both **Eye-Shot Theory** and **Clean Sweep** are terms introduced without evidence of any scientific basis.

B1 - Goal 1: To rule out the presence of any concealed recording devices; Goal 2: To control visual access of private area; Goal 3: To maintain clear sight of minors and staff; Goal 4: To maintain visual access promoting accountability

- This policy has created its own definition of **Clean Sweep** as "an inspection of facilities for the detection, identification, and removal of concealed recording devices in the prevention of illegal reporting." This is confusing, as it is not the definition many people will think of when they hear the words "clean sweep."
- **Clean Sweep** is explained further (page 32). It is adapted from the Missouri State HWY Patrol Division of Drug and Crime Control. If technical surveillance countermeasures are required, this information could be included in the Job Description of individuals who would be responsible. Reference could be made to it happening within a risk analysis, but the level of detail in Addendum B.1 is not appropriate for a safeguarding policy.
- In this section the acronym **TLS** or **Threat Level Score** is introduced and the Kanakuk Abuser Threat Indicator is referenced (page 36 in the 2019 CPP and moved to the new front section in 2022 CPP). There are numerous problems with this indicator, including:
 - The title assumes that all people involved with the camp will be abusing children. This is offensive to most people working and volunteering at the camp who are there for the wellbeing of children;
 - It is acceptable to have a "level" assigned to specific roles within an organization to indicate which roles require which level of training, police checks, references etc. As this is an overnight camp situation, anyone present can potentially have access to children. Therefore, all paid and volunteer roles need to have a "high" child safeguarding level assigned to their job description;
 - The second indicator refers to the degree of "CONTROL" of minors and programming. In any setting, this is a negative way to describe the relationship between adults and campers. It places the power with the adults to "control" the children. When it comes to safeguarding, this is the opposite of what should be done. When adults hold all the power, there is an increased risk of harm to a child. Children should also have power and

participate in decisions that affect them, including through the knowledge of how they should expect to be treated while at camp;¹⁵

- The requirements for visual access to private areas could be reframed as, “Our organization respects privacy, including in bathrooms and showers. The only time an adult would enter a children’s bathroom is for an emergency health or safety reason.”¹⁶
- In the 2022 CPP, B1.2 is missing some information that was included in the 2019 version. This omission may be due to formatting.
- The list of locations identified as “**non-private**” will be different per camp. Rather than a generic list, this should be included in a risk assessment.

B2 - Goal: To limit access to minors by persons not directly associated with the program to reduce opportunistic abuse scenarios

- It is appropriate that steps are taken to ensure that anyone coming to the camp, be they parents, **independent service providers** or **independent delivery providers** are made aware of the requirements of a child safeguarding policy. However, there are a few challenges with the way this is framed in the policy.
- The Overnight Guest/Volunteer application (page 38):
 - The document only asks if they are a student and there is no information requested for a guest who has graduated from school;
 - The names of the camps are not listed, just assigned a number. This could lead to a person applying for the incorrect site;
 - The Guest/Visitor GUIDELINES referenced are not included. Or, is that the Guest/Volunteer Commitment?;
 - The “high standards of moral and ethical treatment” are not included;
 - There is a reference to zero tolerance for staff members but no mention of volunteers or guests who are the ones signing this document;
 - There is a reference to training but no direction as to where to get the training;
 - This section would be clarified if a Code of Conduct existed for everyone involved in the camp, outlining what is and is not acceptable behavior;
 - This section would be clarified by reference to a distinct Whistleblowing Policy. The policy should include information encouraging people to report and that no retribution will happen if a false report is given, provided it was not done intentionally. People reporting suspicions leads to perpetrators being caught. The implication that a false allegation will not be held confidentially and could harm the signer’s position with Kanakuk is not encouraging mandatory reporting.
 - The reviewers question if Hope for the Heart is the appropriate organization to support someone “struggling with a sexual attraction to children.” The phone number offers access to life coaches which is not what is required. We are unable to ascertain if Hope for the Heart has expertise for working with predators. To book a counselling appointment in the

¹⁵ United CRC Nations - office of the United Nations high commissioner for ... (n.d.). Retrieved May 31, 2022, from <https://www2.ohchr.org/english/bodies/crc/docs/AdvanceVersions/CRC-C-GC-12.pdf>

¹⁶ Youth Protection and adult leadership. (2021, November 19). Retrieved May 31, 2022, from <https://www.scouting.org/health-and-safety/gss/gss01/>

North Texas area – you can press 5. What if the person struggling with a sexual attraction to children does not live in North Texas?

- It is appropriate to have a day visitor/volunteer form (page 40). Anyone coming onto the camp should receive a copy of the Policy in advance, a copy of the Code of Conduct and be asked to sign a document stipulating that they will abide by these documents. The ways to report a suspicion, usually a flowchart, should be prominently posted in the welcome office and can also be included in the package for each visitor. The documents should be short and clear:
 - This document does not include all the “do’s and don’ts” for the camp that we find in other places in the CPP. Consistency could be achieved by having a Code of Conduct;
 - Who is a “certified operator” that gives permission for someone to participate in any “organization-related activities?”;
 - The reporting options include reporting to the nurse. This is inconsistent with other reporting options. It would be logical for the reporting requirements for the camp to have been shared within the CPP prior to appearing in this Addendum for day visitor/volunteer;
 - The medical release is also for children. But the rest of the document is directed, it seems, to adult day visitors/volunteer. If this is intended for a child, it will need to be a different form and the child plus the parent/legal guardian will need to sign;
 - There should also be a child-friendly version of the Policy and Code of Conduct so that the children know what they can expect from the adults.

- The statement of purpose and scope of the Vendor Policy (page 41) is a good approach to clarity within a policy and something that would be useful for the overarching CPP to include. Moreover:
 - Again, anyone coming onto a property should be provided with a copy of the Policy and Code of Conduct in advance. They should then be required to sign a document stating that they will abide by them. The ways to report a suspicion, usually a flowchart, should be prominently posted in the welcome office and can also be included in the package for each visitor;
 - The adult properties referenced are undefined. It would be good to better understand the requirements. If this reference is to vulnerable adults there will need to be a safeguarding policy and procedures specific to them;
 - If someone fails a screening for criminal history and sex offenders, that individual should not be permitted to enter any property, not just youth properties;
 - There should be specificity as to who will perform and pay for the screening;
 - A sample conduct agreement could be included as an example (unless this the same as the “Independent Service Worker Statement of Understanding”);
 - Conduct violations depending on where they fall within the “major” violations will need to be reported to the authorities. For both “minor” and “major” violations, there will

- need to be an investigation and the recording in the database, which needs to be password-protected;
 - Who is the "Safety Manager?" Is this the same as the "certified operator?" Use of multiple terms adds to confusion;
 - Access. Unaccompanied Access should require these individuals receiving the Policy and Code of Conduct in advance, plus complete basic training. An online introductory safeguarding course is a good approach. People with accompanied access should also receive the policy and the Code of Conduct but should NOT be accompanied by a person under age 18.
- The Vendor Security Policy (page 42) has not been referenced in the CPP. We note the following:
 - It is unclear why public service vendors are exempt;
 - Public service vendors should not be allowed to walk about unaccompanied or only be subject to general monitoring.
- **Independent Service Provider (ISP) Eligibility Standards (page 43)**
 - Again, they should be given the Policy and Code of Conduct in advance. The child safeguarding reporting flow chart should be clearly visible in the greeting building and pointed out to all who enter. It can also be included in the package sent in advance;
 - It is good that they all must complete a background check. It is important to realize that this is only one step towards creating a safe environment for children;
 - All Independent Service Workers (ISW) are required to sign the "ISW Statement of Understanding" (page 44), which does not include all the aspects of what should be included in a Code of Conduct;
 - The ISW Construction Boundary Map (page 45) appears to be missing information. Important buildings for safeguarding purposes need to be labelled. In some instances, reporting to the nurses' station is an option, but the nurses' station is not identified on the map. The green space is not identified.
- **Independent Delivery Provider (IDP) Eligibility Standards (page 46)**
 - Again, all should receive a copy of the Policy and Code of Conduct in advance and sign the acknowledgement form upon arrival. The reporting flow chart should be visible when they check into the office. It can also be included in the package sent in advance;
 - This has instructions for the Branson and Lampe camps. What about other sites?;
 - If an Independent Delivery Driver (IDD) violates a rule they are reported to the Director of Risk Management. This is a new position accepting reports which causes confusion. Procedures for reporting suspicion need to be consistent;
 - Note that there are references to a Safety Manager, Certified Operator and Director of Risk Management as positions accepting reports;
 - The Independent Delivery Driver Statement of Understanding (page 47) would benefit from a Code of Conduct to be consistent.

C: Staffing Positions (Paid/Unpaid)

The distinction between paid/unpaid staffing positions is worrisome. Classification should be developed based on access to children. For an overnight camp all paid/unpaid staff will have access to children, therefore they should all be receiving the highest level of safeguarding due diligence. Year-round staff who are not on the property should receive training, but this training would not require the same level based on their roles. The Board – if there is one – should receive training focused on the Policy and their responsibilities as accountable personnel. Any employer in an overnight camp situation should be considering safeguarding throughout the hiring process including in recruitment, selection, onboarding, and performance review.

C1 - Goal: To prevent ineligible persons from having access and/or control of minors

- The reviewers previously commented on the **Threat Level Score** when it was first raised in Grounds & Facilities.
- The **Advanced Screening Techniques** include 1) follow up if anything has been crossed out 2) make sure there have been no editorial notes above the signature line and 3) make sure they signed the right name. These unfortunately are not robust enough to flush out any potential safeguarding risks.
- This section has eight references to the Advanced Screening Techniques which are not sufficient techniques.
- While the application EMPLOYMENT/Volunteer (page 49) includes “volunteer” in the title, the application is geared toward employment. Moreover:
 - Use of Latin Terms unnecessarily complicates the CPP;
 - Violence against anyone should preclude someone from working at the camp;
 - Some of this information is not relevant to safeguarding: for example, verifying citizenship information. A more effective approach is to have a procedure on recruitment and limit this to the various steps required for safe recruitment;
 - There is a call for a reference from a person of the opposite sex (not a family member), which has no explanation. What is the rationale behind this?
- The Advanced Screening Resources (page 68) is a list of websites, rather than a tool to help human resources staff to screen for safeguarding flags. On top of that, of the five listed, only one takes the reader to a resource:
 - The Staff Screening Toolkit takes us to the home page of AmeriCorps, where both the CDC site and the Church Law and Tax Store links no longer exist. The US Department of Justice Article is an article from the National School Safety Centre resource from Spring 1994. Finally, Praesidium takes you to the home page but with no concrete list of screening techniques;
 - As part of the screening process, all staff and volunteers must have reference checks, not only those for example, whose “volunteer/work history is centered on a certain age and gender of children.”
- The Character Reference Letter (page 54) includes some logical questions. Others could be fine-tuned. For instance:

- "I would leave my child in the care of this applicant" assumes the person has a child. A more reasonable question is: *"to the best of your knowledge, has the candidate ever behaved in a manner that could compromise a child's well-being, safety or security? Please explain any potential concerns you may have;"*
 - The Character Reference Letter states that this information will be held in confidence. However, it asks about "questionable physical contact with a child." This question would need to be followed up on, as it could be considered a disclosure, which must be reported and cannot be held in confidence.
- All staff and all volunteers would need to complete a criminal history disclosure statement.
 - The term "child pornography" is no longer an acceptable nor standard term. "Child sexual abuse materials" ("CSAM") is a more accurate description. While it may sometimes be necessary to use the term "child pornography" to ensure that people clearly understand what is being referenced, it should always be followed by an explanation as to why we no longer use that term. This is an opportunity for education.
 - C1.5 asks for compliance to company policies and procedures. These are in various places in the document and not easily located throughout the CPP. The applicant should receive a package with the Policy, Code of Conduct, and any necessary documents to sign in advance.
 - The requirement that the application includes a "statement of authorization and release for respondents" is too broad.

C2 - No Goal

- All staff AND volunteers must be interviewed.
- It would be helpful to have a tool for people conducting interviews to provide examples of questions with prompts for follow-ups and concerns. This resource would be for Human Resources and not included in a CPP.

C3 - No Goal

- The "staff commitment statement" (page 73) does not contain all the information required in a Code of Conduct.
- The form requirements do not go far enough to outline what is acceptable/unacceptable behavior for the camp.
- It is not only sexual abuse that needs to be reported.
- This document also includes the language about false allegations potentially harming the staff member's position. This is a generic form. Is this not intended for Kanakuk?

C4 - No Goal

- The Fair Credit Reporting Act does not belong within a child safeguarding policy.
- As previously mentioned, the Guidance for Camps and Other Youth-Serving Organizations: Developing Criminal Background Thresholds (page 56) was updated in January 2018, but the CPP includes the version from 2012.
- This does not belong in a safeguarding policy but is a tool for Human Resources.

D: Training & Orientation

Note again the unnecessary delineation between paid positions versus volunteers. Safeguarding is everyone's responsibility and therefore everyone should have training.

D1 - Goal: To promote uniform understanding of child abuse and molestation, reporting guidelines and supervisory roles; Goal: To promote accountability and clarify supervisory expectations

- The Staff/Volunteer Code of Conduct (page 66) should be given to everyone prior to arrival at camp, they should be trained on the Code, and they should sign a copy agreeing to abide by the Code.
- How does this Staff/Volunteer Code of Conduct (page 66) relate to the Code of Conduct (page 75)? The Code on page 75 is not referenced in the CPP.
- The guidelines for a Code (page 66) includes leg sitting as appropriate, when this should be in the inappropriate range. The reviewers are uncertain as to why only touching of private parts gets a "no exception." All "touch" as described in this section should be forbidden. The reviewers are also unclear why only "intimate" wrestling or tickling is forbidden when all such contact should not be permitted.
- Additional points that should be included are as follows:
 - Do not keep information relating to a harm or potential harm of a child or information regarding concerns about an adult confidential;
 - Do not investigate allegations of abuse yourself;
 - Do not contact a child one-on-one through any form of social media;
 - Do not photograph or film a child without prior consent, including that of parents/guardians.
- All paid and unpaid personnel must be given guidelines for reporting suspicion of misconduct and be trained on how to report.
- The sample options for reporting (page 95) raises concerns:
 - For Option 1, there is no timeframe listed for how quickly action will be taken. There is no sample report format included. With all the extra information included in this policy, it would be good to see the Terms of Reference for the reporting agent or indication of who that will be. There is nothing that states to whom the reporting agent will report cases. Solely internal management of such information is problematic. There is no clear guidance on what the person should do if the child has been seriously hurt or is in imminent danger of being harmed (call 911) vs. a non-emergency safeguarding concern;
 - For Option 2, again this option is not appropriate for an emergency but can be used for a non-emergency safeguarding concern. There should be one designated person per camp, ideally the safeguarding focal point, who accesses the "Safe Box." This person will require additional training, including understanding the importance of confidentiality and mandatory reporting. The box refers to Level 2 and Level 1 but unclear what these mean as there is no prior definition of these terms. These boxes are a useful tool for children to report anonymously, but adults should be required to complete a formal report;
 - Option 3 is the hotline that the CPP states is only posted within the business office. This is too isolated, and not accessible enough to the wider camp.

D 1.3 - review separated from the rest of section D due length of comments

- Any training should not be restricted to “ALL paid staff.” Safeguarding children is everyone’s business;
- The training sample provided (page 60) was developed by the Texas Baptist Camp Managers Association. There is nothing that states this is simply an example; it needs to be modified to be aligned to the CPP. The reviewers note, also, that the legal framework provided is Texas law. Adaptation will/would be required for other jurisdictions;
- It is unclear whether this is a hand-out and one that is simply read by individuals on their own. Safeguarding training for persons with access to children should be in-person to allow time for people to discuss and become comfortable with the Policy and how to respond. Facilitators need to be trained to implement the training. Rather than include this document, if the camp feels including training in the procedures is necessary, it could include a suggested agenda, with objectives and methodologies;
- The first section is called “The Definitions and Effects of Sexual Abuse and Child Molestation,” but the definitions go beyond sexual abuse and child molestation. Child molestation is also not currently accepted term given that it invokes the use of physical force, whereas child sexual abuse may or may not result from physical force;
- The definitions used in the training should be the same definitions that are included in the policy, and this is not the case;
- The language is not rights-based;¹⁷
- The effects of child abuse quotation from AWANA Child Protection Policy Training is also not rights-based and does not put the child in the center: *Studies have shown that abuse and neglect may negatively affect children’s physical, cognitive, emotional and social development, resulting in aggressiveness, anxiousness, the inability to control emotions, depression, and learning difficulties, among other problems;*
- When delivering any training, the facilitator must assume that a survivor of child abuse may be taking part in the training. The language used to describe the effect of abuse, as presented, could re-traumatize a survivor. Similarly, language about children being more likely to abuse if they have been abused themselves needs to be reconsidered;
- The definition used for a “child molester” is concerning. A child molester is described as “a person older than the victim, male or female.” It also says that with young children close in age (no more than a 3-year age span) sexual contact is called “camper-to-camper contact.” It goes on to say that in other cases, especially more than a 3-year age difference or children who are “pubescent,” molestation may be involved. This is worrisome, as there is potential for consenting young people to have one partner labelled a “molester.” While this would go against the camper Code of Conduct for this camp, labelling a child a “molester” is not appropriate;
- In the section on *Signs, symptoms, and reporting of suspected sexual abuse*, the reviewers query the emphasis on sexual abuse only;
- It is important to note that all victims can react differently;
- The statement “many people are afraid to report sexual abuse” needs to be further explained with reassuring language, and it needs to assure people that reporting is the right thing to do and will have no impact on their position if it turns out to be false but done in the best interest of the child;

¹⁷ Tool 3: Summary of the child rights approach and guiding questions. (n.d.). UNICEF. Retrieved June 5, 2022, from <https://s25924.pcdn.co/wp-content/uploads/2018/01/Tool-3.pdf>

- The “one in three cases of child abuse not being remembered later in life” statement should be sourced;
- Section D *Recommended Rules and Procedures for Youth Camps* is again different from what is included in the CPP. Thus, it is unclear what to follow;
- The section on how to prevent camper-on-camper abuse could begin with ensuring all campers are aware of the Camper Code of Conduct and agree to abide by that Code¹⁸;
- Not enough is included regarding what actions a person should take when a child discloses information to them;
- Any child safeguarding training should be based on the safeguarding policy and procedures specific to the camp or other organization in question.

D.1 - continued

- **360-degree supervision** is an HR management technique that allows for performance to be reviewed by both supervisors and supervisees. This is not a safeguarding term;
- The 360-degree supervision (page 91) is overly complicated. It is okay to check in with personnel with quizzes and other tools to see if they are understanding the Policy and Code of Conduct.
- The camp is putting children (and itself) at risk by encouraging contact between personnel and campers outside of the camp setting;
- The year-round contact with minors policies/guidelines (page 86) stipulates that if parents do not want you to communicate with their child, you must honor their request. This seems helpful;
- It also says that communication must be to the same gender, which does not take into account sexual orientation;
- No calls or texts should ever occur one-on-one, even with parental approval. Other places within the CPP have been clear on no one-on-one while at camp, why is it acceptable after camp? The question also applies to written communication;
- An adult from the camp should never accept a “friend” request online from a camper. This should be clear to campers and personnel while at camp so that a camper will not expect a counselor to accept their friend request and will know not to accept a friend request from a counselor;
- Never visit in the home;
- No counselling by unqualified personnel, even if they are well-meaning;
- The Transportation Policy (page 90) is putting campers and personnel at risk. If there is an emergency there should be a protocol for transportation. Outside of that, it is unclear why personnel would be transporting individual campers;
- The Weekly Briefing refers to the Code of Conduct, but while there is a document called a Code of Conduct it is not clear; and there are additional aspects of a Code that are found in other areas of the CPP including the Staff/Volunteer Code of Conduct;
- The Reporting now says they can report to a counselor or director. This is yet another inconsistency.

¹⁸ It would be good practice for the Camper Code of Conduct to be developed with campers.

D2 - No Goal

- Great that training will be provided for human resources roles. Unfortunately, this relies on the [advance screening techniques](#) (page 68) that are insufficient.

D3 - No Goal

- It is unclear which Code of Conduct and guidelines for reporting parents will receive.
- The sample parent letter #1 (page 74) is from 2012. It appears to be a generic letter that can be used by any organization which leaves the reviewers unclear as to what is meant by "our organization has never experienced any situations of this nature." That statement is definitive, and unfortunately cannot be included in an example generic letter to parents.
- The reviewers are unable to comment on the Code of Conduct and Disciplinary Policy (assuming it is also from 2012) without accessing what version was used at that time.
- Sample parent letter #2 (page 78) only refers to sexual abuse and refers to a "new and interesting method of parents teaching children how to protect themselves from sexual predators. We wish to share this material with you in the event you have not seen it yet." This is an article from 2010. The reviewers question the salience of a 12-year-old reference considering that much has been learned between 2010 and today.
- Sample parent letter #3 (page 83) is from 2013.
- This letter notes the training required to have "safe" communication with youth and their families. It also notes that the policies are rigorous, and the staff may not fully understand them. If a policy is not understood by the people meant to be implementing it, the organization needs to change the policy. The responsibility should not be with parents in this case.
- Other links on this page were shut down.
- The reviewers have also seen the 2022 parent letter which is not included in the 2022 CPP. It is unclear who or what organization deemed the CPP the "gold standard." Likewise, it is unclear on what subjects the six hundred people have been trained. Perhaps it was the training from page 60 but this is not explicit. There is no mention of the recruitment process or training of anyone other than staff. One wonders about the training of the volunteers. That there are Sheriff Deputies at the opening and closing of camp raises questions. Again, there should be no communication between the campers and the counselors outside camp. A survivor needs more than spiritual and emotional support. The letter refers to two staff while the [Kanakuk's response page](#) refers to one staff member having abused children. The response page speaks to "victim's rights to speak out as part of their healing;" this letter refers to "publicity stunts." The website also lists the six hundred organizations, but here it says the CPP has been shared with them, different language than trained. Having 340 identifiable and measurable protection elements is also questionable. One wonders what process was followed to derive these and to determine them to be the correct ones. That there are separate camps and separate videos for the mainstream camps and other camps for "urban youth" raises questions.

D4 - No Goal

- This includes the Maintenance Personnel Code of Conduct (page 69). The organization should have one Code of Conduct that applies to all personnel.
- If this is Addendum D2.c, why is it listed under D4?

D5 - No Goal

- The 3-6-0 Safe and Secure Orientation (explained further on page 85) needs revisiting. Again, there should be no difference in training and child safeguarding policies between paid and unpaid staff at a camp.
- In this document, reporting procedure gives the option of reporting to a nurse in the health center. This was not an option that was included in the training for personnel.
- Good Touch vs Bad Touch is not the same list as was included in the staff code of conduct (Addendum D.2a); this also holds true of Good Talk vs Bad Talk.
- This could be reframed as a document letting children know what is expected of them and what they can expect from the adult personnel.
- While a zero-tolerance policy is appropriate for adults, it is not always appropriate for a child. The zero-tolerance policy does say it “may” lead to immediate dismissal from the program, but hopefully if an adult forces a child to have one-on-one time with them this does not result in the child being dismissed from camp. It is better to be clear as to what applies to children and what they can expect from adults.

D6 - No Goal

- The training matrix should be revised to indicate that anyone on camp property full-time completes all the child safeguarding requirements.
- Anyone on the property should receive a copy of the Policy, Code of Conduct and any related policies (Whistleblowing etc.) and sign a document stating that they have read the policies and agree to abide by them.
- The Director Child Protection Checklist (page 116) is one of the few Addendums that has been updated from 2019 to 2022. Unfortunately, the 2022 CPP does not include the updated checklist, but this was shared with the reviewers separately. The following comments are based on the updated version of this document.
 - This version is clearer than the previous versions.
 - Yearly review needs to include a risk assessment. This should also be revisited throughout the year and seen as a living document. Periodic external review is essential.
 - The staff documentation should be conducted at the same time as when the signed “staff commitment” training is. Additionally, there should be a list of all training received. This should be in place in case an audit is required.
 - Administrative would be clearer if there was clarity on the reporting protocols. Is the new Kanakuk 1-800 number also posted? Are the packages ready with a copy of the policy (not this version – but a concise version) and Code of Conduct available via email to visitors before coming?
 - It is good that the training is for all staff/volunteers with direct or indirect access to kids.
 - Training & Orientation. It would be good to know more about CircuiTree and its database privacy policy if they are the holders of these documents.
 - Daily Checks/Reminders. There should be control over who checks the Safe Box.
- The questions to the Missouri Department of Family Services (page 119) are not actually questions but a summary of someone’s – the reviewers are uncertain of the origin – interpretation of how the state will respond to a case of physical abuse. The date is not

provided, so one is uncertain how old this document is, which is essential information to determine if the reader can trust this information.

- Most importantly, the reviewers find it unclear why this is included in here. Reporting needs to be encouraged. As presented, this would dissuade reporting.

E: Monitor and Report

E1 - Monitor: No Goal

- Readers were previously directed to the [360-degree supervision theory](#)
- Listing the tools used to monitor (Code of Conduct, Ethics and Compliance Training, Primary and Secondary supervision, The Eye Shot Theory and Non-compliance and Reporting) overwhelms the reader. There should be one resource for monitoring. A Code of Conduct for example does not monitor. It does say what personnel can and cannot do, but it does not monitor that activity. To monitor, a reporting system is needed.

E2 - Goal: To reduce the opportunities for isolation leading to abuse

- No substantive comments

E3 - Report. Goal: To promote better access for minors and staff to report a sensitive matter without fear.

- The option of reporting to the nurse is no longer listed as an option.
- The sample comment card (page 188) is a valuable tool for a camper to comment on minor issues.
- To raise a safeguarding concern, additional guidance should be offered, e.g. instructions on where to obtain a comment card.

E4 - No Goal

- There is inconsistent information regarding the identity or title of the "Abuse Reporting Agent."
- The form should include documentation of any immediate steps taken.

E5 - No Goal

- The Abuse Response Protocol for NON-ORGANIZATION RELATED child abuse allegations needs to be explained.
- There should not be four examples of reporting to the authorities. The CPP should have one that they expect all personnel to follow with a clear format.
- The flow chart (page 96) is a helpful tool:
 - There are normally a few paths that can be taken, including the actions to take if the person accused is personnel from the organization or not. When you are confronted with abuse by an "associate" of the camp, there will be additional issues to face, including human resource implications;
 - The first step following a report needs to be to determine if the child requires immediate medical attention;

- It should not be suggested that a staff member go to the office and get a paper and learn about how to respond; it is too late for this if the child is disclosing.
- Clear identification of the reporting agent is needed. This is unclear, and it is fundamental to effective safeguarding;
- What qualifications or training does the director have to determine if there is enough suspicion of abuse?
- Even if a case does not warrant being reported to the State's reporting agency, it still needs to be documented. It is good that this is being documented;
- When a case is reported to the State's reporting agency, is there any follow-up to ensure action has been taken? This is not obvious in the CPP.
- The reviewers have not commented on the flow chart (page 97), as its use is unclear.
- Responding to a Minor's Report of Abuse (page 100) could be simplified but is useful.
- Reporting alleged child abuse and/or neglect (page 103). When an official report is made, the camp should follow the direction of the investigators.
- Abuse Report Form (page 95) has been reviewed above.

E6 - No Goal

- Child Abuse Situations Flow Chart (page 96 rather than 95) has been commented on above. As this is about an internal case, this needs to be reflected in the flow chart.
- Responding to a Minor's Report of Abuse (page 100 rather than 99) has been commented on above.
- Responding to the Alleged Abuser (page 101 rather than 100) in both examples, depending on the allegation, should involve first calling authorities rather than starting an investigation by the organization.

F: Crisis Response

F1 - Goal: To equip our organization to effectively manage a sexual molestation crisis in cooperation with legal, insurance, and media agencies; **Goal:** To align with insurance expectations and expedite resources for potential victim care

- The Crisis Response Team includes seven people who are both internal to the team and external.
- There should be a small multi-disciplinary team (MDT) supporting the child consisting of medical professionals, a social worker and others as the child requires. This team of people should be separate from the camp but paid for by the camp if requested.
- The crisis response team suggested here is again about protecting the camp, not the child. This information does not belong in a child safeguarding policy.
- The Sample Communications Plan and "Media Do's and Don'ts" (page 107) is not specific to child safeguarding and should not be included in this policy. There is nothing included that refers to the sensitivity around a case being reported in the news and what information should and should not be shared to protect victims.
- The Hard Copy Retrieval (page 111) from 2010 is out of date. Most documents are not stored as paper documents, and this policy (which should not be in a safeguarding policy) does not cover responsible storage protocols for electronic documents and other data.

- The Crisis Response Script (page 112) includes statistics that are not sourced. It is designed to protect the camp rather than protect the child. It also does not belong in a child safeguarding policy.
- The Q and A (page 113) includes worrisome information:
 - This provides a script that will not be accurate for other cases;
 - Why did the camp not report to law enforcement but leave that to the parents? The camp should also report this to law enforcement, in addition to child protection authorities.

Documents included as Addendums but not referenced in the policy:

What Every Parent Should Know (page 79)

This document is from 2010 and is out of date. It should not be included in a child safeguarding policy.

Child Protection Plan Implementation Worksheet (page 121)

Unclear what the purpose is for the worksheet.

Self-Assessment (page 122)

A self-assessment can be a helpful tool for an organization to identify potential gaps in their child safeguarding policy and procedures. It is unclear how the points system including in the self-assessment will be used. Is this for the individual camps or for headquarters?
