Guide for Developing Internal and External Policies & Procedures for Supervised Visitation & Safe Exchange Programs

Inspire Action for Social Change

http://www.inspireactionforsocialchange.org

Developing or modifying policies and procedures can be daunting, whether you are building a supervised visitation and safe exchange program from the ground up or taking a moment to re-examine your current programming. The *Guide for Developing Internal and External Policies & Procedures for Supervised Visitation & Safe Exchange Programs* is a tool to support your efforts.

Policy and procedure development is crucial to ensuring compassionate, equitable, and trauma-informed service delivery. Therefore, it's vital that supervised visitation and safe exchange programs intentionally and thoughtfully develop sound policies and procedures rooted in shared values across your staff, partners, and stakeholders from the onset. Many people perceive policy and procedures as "objective and logistical." However, a trauma-informed environment recognizes that no aspect of service delivery is "objective"; we must be thoughtful across differences in identity, experiences, culture, and expectations. As your program engages in community readiness activities and works towards clarity around your values and vision, your policies and procedures should reflect those shared commitments. When a program develops or revises policies and procedures thoughtfully with a diverse group of stakeholders, the program is more likely to be informed by and responsive to the individuals and communities being served.

It should be noted that this document centers on providing supervised visitation and exchange service delivery in the context of intimate partner abuse, with the recognition that family violence is present in a preponderance of circumstances that lead families to the doors of a visitation program. Accounting for intimate partner abuse should never be an afterthought in developing services.

It is essential to ensure supervised visitation and safe exchange programs' internal and external policies and procedures:

- Align with the Office on Violence Against Women: <u>Supervised Visitation & Safe Exchange Guiding Principles</u>[1] and are firmly grounded in the mission and role of your program, and

- Are grounded in the role to:
  - 1) ensure services are facilitated without abuse of either parent or the children,
  - 2) work to interrupt harm related to the reason the family is using services, and
  - 3) make visible any behavior that poses a continued risk to survivors and their children

Key Structural Elements

A clear distinction between internal and external policies and procedure documents.

Internal and external policies and procedure documents are not one and the same and can not be used interchangeably. Your internal policy and procedure document guides and directs the decisions, actions, and activities of your organization and its employees. Your external policies, also known as participant guidelines or parent handbook, provide a clear understanding of the role of the program and the expectations of behaviors and transparency about why such expectations are in place for those seeking assistance.

[1]US Department of Justice, Office on Violence Against Women. (2007). *Guiding principles: Safe havens: Supervised visitation and safe exchange grant program*. https://www.google.com/url?q=https://static1.squarespace.com/static/5665d0a8b204d5e193b65ef4/t/60dca51e56ff382fd2767bb5/162507292741 5/OVW%2BSV%2BGuiding%2BPrinciples%2BFull%2BDocument.pdf&sa=D&source=docs&ust=1670965170694115&usg=AOvVaw0RNAZ-y6460DgocjSNgGdT

Key Elements of Internal Policy and Procedures

Organizing your internal policy and procedure document with a clear statement of purpose, a clearly articulated policy, and precise procedures to support and carry out each policy will support your ability to clearly distinguish policies from procedures and ensure clarity and transparency of each policy**.**

The purpose statement clearly and precisely outlines why the policy or section of policies exists. The purpose statement should be linked to the organization's mission and role of the program and be firmly grounded in the Office on Violence Against Women Supervised Visitation and Safe Exchange Guiding Principles. Without providing a purpose statement for each section, the program can easily lose the intent and the "why" behind the policy and procedures.

The policy provides what must be followed.

Procedures are the instructions or the "how" to carry out a said policy.

A list of suggested internal policy and procedure sections can be found in Appendix A.

Key Elements of External Policy and Procedures

Ensure your external program policies and procedures account for the unique needs and safety risks of each family you will serve. Many family circumstances are unique and will require varied and tailored responses. It is important to recognize that some families will require more rigid and strict guidelines to be in place to support safety, and some will not require these same limitations. In fact, for some families, when guidelines are imposed that are not relevant or applicable to their life circumstances, they can compromise the safety of the protected parent and create unnecessary conflict and tension between staff and parents.

Some specific guidelines that may not be relevant to every family you serve include:

🚩 Guidelines that require participants to stay in the "here and now."

🚩 Guidelines that don't allow participants to include the child's family in their conversation—for example, the child's other parent.

🚩 Guidelines that focus on redirecting different parenting styles or choices.

🚩 Guidelines that assume the person who uses violence is the visiting parent.

🚩 Guidelines that impose values and beliefs—for example, imposing a dress code, setting an expectation of the level of interaction parents must engage in during the visit, level of affection, the type of food parents can bring, and placing a limit on screen time during visitation.

🚩 Guidelines that don't allow participants to talk about what brought them to the center.

Create external policies and procedures which support flexibility and account for individualized safety concerns and the ability to account for and meet the unique needs of each family you serve. Avoid creating a "laundry list" of external parent guidelines around what is not allowed during service delivery. A long list of mandates sets an intentionally harsh tone that doesn't support an understanding of what purpose such policies serve and sets the stage and inclination to create more guidelines ("can't do" statements) when something new or unexpected occurs. A program can't begin to predict every possible issue that will arise.

Moving from the "because we said so" notion to full transparency with an explanation of why the program has put specific policies in place is a key factor in how a program can provide long-term support for families.

For example:

> "A cancellation of supervised visits and exchanges require 24-hour notice - failure to provide such notice on three occasions will result in services being suspended."

vs.

> "Most children do better with predictability and a stable routine; therefore, the supervised visitation program values consistency. To support such consistency for each child and parent using center services, we ask parents to commit to a regular schedule, participate in all scheduled visits/exchanges, and provide plenty of time (at least 24 hours) for a visit to be canceled if necessary. Providing advance notice will allow children to have advance notice of a change in plans and will provide the child with a sense of predictability. You must let the visitation center staff know if you cannot attend a visit for any reason."

Engagement and Evaluation

To ensure your program is informed and responsive to the individuals and communities being served, it is essential to be informed by, learn from, and engage with participants, staff, and community partners to help guide decisions, evaluate services, and continually assess the effectiveness of current practices. This paper on Informing the Practice of Supervised Visitation can support your learning and exploration. This resource reviews six approaches to learning about the quality and impact of supervised visitation practices from participants, staff, volunteers, and community partners. The methods include questionnaires, interviews, focus groups, check-ins, case file reviews, and family case consultations.

Final Check: Anticipate and avoid unintended negative consequences. When developing internal AND external programmatic policies, ask the following questions of each policy:

- How does the policy support your mission and role?
- Does this policy support the OVW Supervised Visitation Grant Program Guiding Principles?
- To Whom is the policy established? Whom does the policy benefit?
- What purpose does the policy serve? What is the intent of the policy?
- How does this policy support the safety of every adult survivor of intimate partner abuse and their children (regardless of custodial status)?
- How will this policy account for the reality of the lived experiences, cultural identities, and unique needs of those you seek to serve?
- How could this policy create risk? How could the parent who uses violence use, misuse, or circumvent the intent of this policy and find ways to use this policy to cause further harm?
- Does the policy/procedure conform to larger organizational rules, laws, or regulations?
- Will you ever need to make exceptions to this policy?
- Does this policy/procedure reflect an understanding that each family will have varying degrees of dangerousness and safety risks? Does this policy assume the greatest risk potential and impose that level on every family?
- Is there clarity around why this policy has been established and who the policy benefits?
- Is there clarity around how this policy will be implemented?
- Does the policy conform to any larger organizational rules, laws, or regulations we are required to follow?
- How will the policy be evaluated?

A policy analysis worksheet can be found in Appendix B to support this exploration.

For more information about promising practices in supervised visitation and safe exchange, training opportunities, resources, consultation, and ongoing learning and growth opportunities, visit http://www.inspireactionforsocialchange.org/

Inspire Action for Social Change

http://www.inspireactionforsocialchange.org
info@inspireactionforsocialchange.org

Appendix A

Supervised Visitation and Safe Exchange
Internal Policy and Procedure Section Considerations

Program Mission and Purpose

Collaborative Partnerships

Glossary of Terms to Establish a Shared Understanding

Program Policies and Procedures
    A. Establishing Services
        A1.Referral to Program
        A2. Referral Process
        A3. Program Registration Process
        A4. Service Determination
            1) Acceptance
            2) Rejection
        A5. What to do When a Family has not Engaged in Services
        A6. Utilization of a Waiting List
        A7. Language Access

    B. Safety and Security
        B1. Security Features and Utilization
        B2. Site design for Safety
        B3. Parking
        B4. Entrances and Exits
        B5. Waiting Areas
        B6. Working with Law Enforcement / Security Personnel

H. Program Service Records

    H1. Organization of Program Participant Records

        1) Information Shared by the Parent Needing Protection

        2) Information Shared by the Parent Who has Caused Harm

        3) Information Shared by EACH Child

        4) Information about the Services Provided

    H2. Participant Review of Records

    H3. Temporary Staff Work Product

I . Outside Communication

    I1. Confidentiality

    I2. Consent to Release Information

    I3. Records Release and Distribution

J. Responding to Subpoenas - Court Orders - Court Testimony

    J1. What to do when a Subpoena is Received

    J2. The Process to Notify Parties when a Subpoena is Received

    J3. Motion to Quash

    J4. Motion to Appeal

    J5. In-Camera Review

K. Service Suspension and Termination

    K1. Interruption of Services

    K2. Suspension of Services

    K3. Termination of Services

    K4. Closure of Services

L. Working with Infants, Children, and Youth

    L1. Connecting with Infants, Children, and Youth

    L2. Reluctance, Resistance, or Refusals

    L3. Intervening on Behalf of Infants, Children, and Youth

M. Staff Family Consultations

N. Regular and Ongoing Check-ins with Each Member of the Family

Please note a comprehensive internal employee policy and procedure manual will also need to be inclusive of employer-required sections such as:

1. History and Description of the Organization
2. Organizational and Governance Structure
3. Employee Code of Ethics
4. Workplace Domestic Violence, Sexual Violence, and Stalking Policy
5. Conflict of Interest Policy
6. Civil Rights and Nondiscrimination
7. VAWA nondiscrimination condition
8. Confidentiality and Information Sharing
9. Sexual Harassment and Other Forms of Harassment
10. Workplace Safety
11. Accessibility
    a. Site Accessibility
    b. Staff Accessibility
    c. Service Accessibility
12. Personnel
    a. Staff Qualifications
    b. Equal Employment Opportunity
    c. Policy
    d. Hiring Process
    e. Employee Compensation and Benefits
    f. Employee Leave
    g. Staff Training
    h. Staffing Requirement
    i. Minimum Requirements for Staff and Volunteers
13. Financial Policies
14. Informing your Work - Evaluation of Services
    a. Participant feedback
    b. Employee feedback
    c. Stakeholder/community feedback
15. Disaster Preparedness Plan
16. Holiday Schedule and Paid Time Off

17. Media Communication
18. Personally Identifiable Information (PII) Policy
19. Whistle-blower Protections Policy
20. Distracted Driver Policy
21. Grievance
    a) Program participant grievance
    b) Employee grievance

Inspire Action for Social Change

http://www.inspireactionforsocialchange.org
info@inspireactionforsocialchange.org

Appendix B

Supervised Visitation and Safe Exchange
Policy Analysis Worksheet

Directions: Using one worksheet per policy, respond to the following questions as it relates to the policy you are reviewing.

Policy Under Review:

Question	Team Response
1. How does the policy support our mission?	
2. How does this policy support why our program exists?	
3. How does this policy support the OVW Supervised Visitation & Safe Exchange Guiding Principles?	
4. What purpose does this policy serve?	

5. Who benefits from having this policy in place?	
6. How does this policy support the safety of every adult survivor of IPA and their children (regardless of custodial status)?	
7. How will this policy account for the reality of the lived experiences, cultural identities, and unique needs of those we seek to serve?	
8. How could this policy create risk? How could the parent who uses violence use or misuse this policy?	
9. Will we ever need to make exceptions to this policy? What exceptions do we anticipate?	
10. Does this policy assume the same level of risks exists for every family served?	

11. Is there clarity around why this policy has been established?	15
12. Is there clarity around how this policy will be implemented? (Do we have clear procedures to support this policy?)	
13. Does the policy conform to any larger organizational rules, laws, or regulations we are required to follow?	
14. How will this policy be evaluated?	