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Managing the Risk of Sexual Abuse in Day Spas

The day spa environment often involves dimmed lights, privacy, minimal clothing, and intimate, physical contact between staff and customers. These characteristics that help create a serene environment can also create an increased risk for abuse. For example, the environment can be manipulated by individuals seeking opportunities to engage in inappropriate interactions with vulnerable individuals, inadvertently lead to uncertain boundaries, and create a higher likelihood of false allegations of inappropriate behaviors.

By incorporating the following best practices, day spas can create a safer environment.

6 Steps to Minimize Abuse Risk in Day Spas

Step 1. Develop policies and procedures that define appropriate and inappropriate interactions between personnel and customers

When personnel are left to decide which conversations are appropriate with customers or whether they can touch clients on various parts of the body, there is no standard definition of appropriate behavior. Be proactive, develop policies specifically a Code of Conduct that defines your day spa's bandwidth of acceptable behavior with customers and delineates a standardized way of providing treatment to customers. Clarify the following:

- Conversations that are off-limits between personnel and customers.
- Areas of the body that are off-limits for massage and how to professionally manage situations involving minimal attire and physical contact near private areas of the body.
- Defined policies regarding the level of nudity and undress allowed during services.
- How to respond when a customer engages in inappropriate behavior during a service.

Step 2. Incorporate techniques to screen for abuse risk within your hiring process

This can start with your job posting in which you can include your Code of Conduct and a statement about your zero tolerance for inappropriate behavior. Your hiring process should include:

- An application that makes it easy to spot red flags, such as short stints with previous employers, questionable reasons for leaving previous jobs, and omitted information.
- Behavioral-based interviewing techniques that require the applicant to tell you how they have handled situations in the past.
- Criminal background checks that meet industry standards. Such checks might include a multi-state criminal search, including an alias search and social security number trace; a national sex offender registry search; and county searches in counties of residence.



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Step 3. Train personnel on written policies and rationales behind policies

Many offenders search for jobs where they can have access to and privacy with their preferred type of victim. Over time, they begin to push the limits related to physical and emotional boundaries. Within the day spa environment, that might take the form of gradually touching customers in ways and places that are outside of defined appropriate physical contact. This is often referred to as the grooming process.

Alternatively, some offenders do not have deep-rooted plans to abuse, but they struggle with maintaining appropriate boundaries with certain customers. Others may notice a decline in their professionalism or ability to follow policies governing behaviors with clients. This might lead to an incident of inappropriate behavior with a customer or a false allegation about their questionable behavior.

Personnel within your day spa should receive training on how offenders operate and why policies governing interactions with customers exist. When personnel understand the rationales behind policies, they are more likely to follow and respond to violations of the policies. Within the day spa environment, it is important to manage intimate environments to ensure nudity and privacy is minimized. Examples of guidelines might include:

- Where and how customers should be positioned and re-positioned during massages
- How to generally maintain a friendly and inviting environment while incorporating such safeguards.

Step 4. Educate customers on your day spa policies and how to report concerns

Empowering your customers with policies further communicates your day spa's commitment to customer protection. You may choose to include an abbreviated Code of Conduct within the waiver your customers sign before receiving services, or at least have a copy available upon request by your customers. This will ensure customers receive information about how they can report concerns. After a customer has received a treatment, conduct a survey to solicit feedback from the customer. Keeping customers informed helps ensure their safety and sends a message to potential offenders that you take this topic seriously and they will not be able to operate within your day spa.

Step 5. Implement a reporting procedure

Your policies should include procedures for how to respond to violations of policies or inappropriate behaviors as well as how to respond to incidents or suspicions of abuse. The policies should make it clear that, not only should personnel report actual incidents of abuse, but they should also report behaviors that do not quite rise to that level. Your supervisors and other leadership should also receive policies on how to respond when they receive reports. Supervisors and leadership should take these reports seriously and respond appropriately to minimize barriers to reporting.

Step 6. Address the increased risk of providing services to minors within policies

If you provide services to those under the age of 18, ensure your policies clarify any exceptions to general practices for these individuals. For example, declare minimum age requirements for services (and if there are deviations depending on the service). Also, determine whether parental waivers might be required before providing services to minors. Policies should also include any additional precautions that staff



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should take when providing treatment to minors, such as whether different minimal clothing specifications exist or whether services can be provided alone and behind closed doors. You might want to specify rooms for working with minors that are less private (i.e., there is more foot traffic outside the room).

Day spas are not immune to the risk of sexual abuse, and it is time to evaluate existing practices to protect your customers, your staff, and your business.

For more information or to learn how to gain access to discounted background checks and online abuse prevention training, please contact us a (800) 611 3994 or programslc@aig.com.

Written by Angelique Dale with Praesidium

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