# What the audit can't see

Closing the gap between compliance and safety

Rick Curtis
Session worksheet. Keep it.

## Two numbers about last year

**Reports filed**
Incident reports involving youth programs your office received last year. Roughly is fine.

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**Times something ran**
Out of how many? Program days, participant-days, overnight stays, sessions.

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80 participants × 14 days = 1,120 participant-days

One two-week residential program. A summer of programs on a mid-sized campus runs into the tens of thousands.

## What the incident log is built from

1 **The day something went wrong** A reportable incident, a policy violation, a complaint

9,999 **The days that went fine** Pickups handled, transitions covered, concerns caught early, staff adapting on the fly

Illustrative ratio, not a measured statistic. After Erik Hollnagel.

## Two ways an office can look at a program

| | Accountability orientation<br>SAFETY SCIENCE CALLS IT SAFETY-I | Learning orientation<br>SAFETY SCIENCE CALLS IT SAFETY-II |
|---|---|---|
| Core question | Why did this go wrong? | Why does this usually go right? |
| Main data | Incidents, violations, completion records | Everyday operations, adaptations, near misses |
| Staff are seen as | A source of error to control | The reason most days go fine |
| Typical tools | Investigation, policy, audit, training | Debriefs, observation, operational review |

**Where accountability is exactly right:** background checks, mandatory reporting, Title IX and Clery obligations, required training. Nothing here replaces any of it.

Hollnagel, Wears & Braithwaite (2015)

## Lakeview University Summer Academy

Experienced program director, three years in the role. Seasonal staff of graduate students and recent graduates. Fully enrolled every summer. One of the compliance office's flagship programs. A composite scenario.

2 wks residential · ~80 participants · 14 to 17 ages · 6 yrs running

### A clean compliance record

- Two-deep policy in the staff handbook — ✓ Met
- 100% training completion, three years running — ✓ Met
- Zero documented two-deep violations — ✓ Met
- Three consecutive clean audits — ✓ Met

### Early pickup

Parent calls the director on the way → Director calls the Public Safety escort → Staff member collects the participant → Escort walks with them to the hall (about 5 min) → All three wait; parent shows ID and signs (about 8 min)

Public Safety's escort service is for undergraduates; the director arranged it personally.

**Two adults with the participant, about 13 minutes**

8 to 12 pickups per session · dozens over six years · 0 in the incident log

### Work as imagined

Two program staff whenever a participant is in a non-public or one-on-one situation. The policy is written.

### Work as done

Activities run at minimum ratio, so the director borrows a Public Safety escort through a personal agreement. Two adults every time, none of it on paper.

### Ask your neighbor, 90 seconds

Where's your pickup? Which protection in one of your programs works because someone quietly arranged it?

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# Four questions about one requirement

Pick one formal requirement from your own programs: mandatory reporting training, background checks, supervision ratios, two-deep, anything. Lakeview is filled in as an example.

C **Completion evidence.** Did the required thing happen? Training rates, check status, signed forms, audit scores.

F **Function evidence.** Is it producing what it was designed to produce? Observation, near misses, staff and family feedback.

| Question | Lakeview Summer Academy<br>Worked example | Your program<br>Your requirement goes here |
|---|---|---|
| **The requirement** | **Two-deep leadership** | |
| 01 **What is this requirement supposed to produce in the field?** | Two staff present whenever a participant is in a non-public or one-on-one situation, so no participant is alone with a single adult out of view. | |
| 02 **What evidence do you have that it's working?** | Policy in the staff handbook. 100% training completion, three years running. Zero documented two-deep violations. Three consecutive clean audits. | |
| 03 **Is that evidence of completion (C) or evidence of function (F)?**<br>Tag each item | C Policy C Training C Zero violations C Audits<br>All four are completion. Zero violations records that nothing was reported, not that the practice works. | |
| 04 **If it stopped working, what would tell you before an incident did?** | Nothing. If the arrangement lapsed, pickups would quietly go back to one staff member alone with a participant, and nothing in the file would change. | |
| THE STRUCTURAL TEST<br>**Would this requirement work the same way if the person currently making it work left tomorrow?** | No. It rests on the director's personal agreement with the head of Public Safety. It isn't in the policy, the training, or any written agreement. | ☐ Yes ☐ No ☐ Not sure Who is that person? |
| RATING<br>**How is this requirement functioning?** | **! Structurally vulnerable**<br>Completion evidence only, no feedback, and it depends on one relationship. | ☐ Functioning structurally<br>☐ Partially functioning<br>☐ Structurally vulnerable<br>Next step: |

## Your first move: seven days after you're back

One program. One move. One date.

**1 One program**
Which program will you start with?

**2 One move**
Check one, then make it specific.

- ☐ Require the two-question debrief
- ☐ Have the program director conversation
- ☐ Assess one requirement, work as imagined against work as done

**3 One date**
Within seven days of getting back to campus.