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PREAMBLE

The Boys & Girls Clubs of Metro South takes the prevention of child abuse very seriously. The Boys & Girls Club understands that child abuse and inappropriate contact of children is a pervasive problem throughout the United States that must be managed in a proactive manner if we are to protect those in our care. The Boys & Girls Clubs of Metro South is committed to taking proactive steps to protect children in Boys & Girls Club programs and facilities.

The Boys & Girls Clubs of Metro South Child Protection Policy outlines policies within the four elements of screening and hiring, training, supervision, and feedback systems. If an allegation does occur the Boys & Girls Club will proactively work with the authorities and the family to respond in a prompt and empathetic manner. All relevant policies will be reviewed every three years and utilize language that is specific and clear for all staff members.
SUMMARY

Screening and Hiring
The Boys & Girls Clubs of Metro South will establish and sustain proper hiring and volunteer selection practices, including completed applications, reference checks, Criminal Background Checks, Social Security checks and documented personnel files.

Training
The rules and expectations will be shared with each new associate/volunteer and regularly reinforced with existing staff and volunteers. This will be done in new associate training, abuse prevention training, the use of a comprehensive Code of Conduct and HR Policies & Procedures.

Supervision
Management staff should have day-to-day interaction, unannounced visits, regular audits and performance reviews to ensure that staff and volunteers understand and follow all organization protocols.

Feedback System
No matter how well we supervise our staff/volunteers, we can’t see everything all of the time. It’s very important to instruct all staff/volunteers to report anything they notice regarding a gap between protocols and practices. It’s also very important to get the parents and families of the children in our programs to know and understand the Code of Conduct so that they can “help us supervise.” Parents will be educated and then encouraged to ask their children about issues such as bathroom procedures, what happens at the club and, ultimately, if anything is making them uncomfortable at the Boys & Girls Club. Feedback and community involvement are vital components of staff supervision and abuse prevention.
1.0 SCREENING AND HIRING PRACTICES

1.0 Applications
- All prospective staff members/volunteers will complete an application to work or volunteer that includes questions regarding past work history, volunteer experience, and education.
- Application will include a statement that the Boys & Girls Club has a zero tolerance standard for abuse and inappropriate behavior by staff members.
- All applications will be completed 100%, signed by the individual and maintained in their personnel file.

1.2 Social Security checks
- A social security address trace will be performed to identify all past addresses (not simply a verification of the social security number).
- Recommended for all staff and all volunteers, verification must be done through social security office or viable and bona-fide external service.

1.3 Criminal record checks
- The Boys & Girls Clubs of Metro South will conduct a search for criminal activity by any prospective staff member or non-policy volunteer (at minimum Criminal Offender Record Information (CORI) & Sex Offender Registry Information (SORI) completed in Commonwealth of Massachusetts). This search may be through law enforcement agencies or through entities that provide such service and may include: examining local, county, state records throughout the entire country; and searching various registered sex offender lists.
- The candidate should not begin work until this step is completed and results are approved.
- For all policy volunteers (board members, standing committees, other) will conduct a search for criminal activity by any prospective policy volunteer (at minimum Criminal Offender Record Information (CORI) & Sex Offender Registry Information (SORI) completed in Commonwealth of Massachusetts). This search may be through law enforcement agencies or through entities that provide such service and may include: examining local, county, state records throughout the entire country; and searching various registered sex offender lists.
- Applicants who are returning staff will receive a new check if they have been away from the Boys & Girls Club for more than 6 months. The organization reserves the right, as a condition of employment, to require a CORI check at any time at its discretion.
- A CORI is conducted every 1 year for all staff.
- In order to request another CORI, the staff member/volunteer must sign and complete the form again (according to Criminal History Systems Board).
- For any child care staff in licensed Massachusetts Early Education and Care programs a complete EEC Background Record Check and fingerprinting will be completed prior to beginning work.
- A conviction does not automatically generate a rejection of the application – all cases are individually evaluated. All CORI reports that have positive findings need to be reviewed with another designated person (i.e. HR, CEO, Supervisors).
- If someone is not hired due to CORI results, they are entitled to a copy of the results and a copy of information concerning the process in correcting a criminal record.

1.4 Reference checks
- The Boys & Girls Clubs of Metro South will contact a minimum of four references for all prospective staff and non-policy making volunteers on an assignment longer than 90 days, one of which must be a close family member to the applicant.
- The Boys & Girls Clubs of Metro South will contact a minimum of two references for all prospective volunteers working with children, one of which should be a close family member to the applicant.
- The reference’s responses will be documented on an approved form that specifies questions for uniformity of evaluation.
- Past employers will be asked if the person is eligible for rehire.
- If the applicant lists prior child-related volunteer experience, these agencies will be contacted for references as well.
• Written references will be accepted only with verbal verification by the Boys & Girls Club.
• Boys & Girls Club’s will be contacted if there is past employment listed on the application/resume.
• Reference checks must be completed by the hiring supervisor, human resources, or approved designee.
• Boys & Girls Clubs of Metro South staff should not be releasing any personal information in regards to staff. Refer questions and inquiries to the Chief Executive Officer.

1.5 Interviews
• Licensed Child Care interviews will be documented on an organization approved interview form that ensures consistency.
• Other than for exceptional circumstances our policy is to have all prospective staff be assessed by more than one staff member.

1.6 Web Search
• The Boys & Girls Clubs of Metro South will take steps to research a candidate online and check for red flags for working with children.
  -Perform Google Search on the person’s full name
  -Check common social networking sites for the individual’s content

2.0 TRAINING AND EDUCATION PROCEDURES

2.1 Code of Conduct
• Staff members/volunteers will sign and date a copy of the Child Care Code of Conduct at time of hire.
• All new staff/volunteers will have the code of conduct reviewed with them at the time of signing.
• The code of conduct will be maintained in the personnel file.

2.2 Child abuse prevention training
• All staff members (including rehired staff, President/CEO, program volunteers) will complete an online child abuse prevention training prior to the start of employment.
• All staff working with children and any 20+/hour per week staff will participate in a comprehensive child abuse prevention training within 90 days of hire.
• Any staff member who does not complete the training as required will be terminated until completion of the course.
• All staff working with children will undergo a review of the training on an annual basis. All 20+ hours/week staff will review every 2 years.

2.3 Electronic communication policy
• See HR Policies and Procedures manual. This policy as well as other HR policies will be given to all staff to review prior to working.

2.4 Follow-up training
• All child care staff will receive additional training on identification and prevention of child abuse throughout the year.

2.5 Train the trainer
• All staff responsible for hiring needs to be trained in the organization’s policies every 2 years. All supervisory staff (those at the director/exempt level) will go through basic supervision/management training within one year of hire or promotion.
3.0 Staff Expectations

3.1 Supervision in structured Boys & Girls Club programs
- In order to protect Boys & Girls Club staff, volunteers, and program participants, at no time during a Boys & Girls Club program should a staff person/volunteer be alone with a single child where they cannot be observed and/or interrupted by others.
- All children who are participating in licensed programs will be monitored by Boys & Girls Club staff during the period/activity time. This includes bathrooms, locker rooms and changing areas. For unlicensed programs, the Boys & Girls Club will apply various controls and monitor these areas as well.
- The Boys & Girls Club will communicate the supervision standards in place with parents/guardians.

3.2 Physical contact with children
- Appropriate physical contact is important in the emotional development of all children and children at different developmental levels will need differing degrees of physical contact.
- Staff/volunteers should not place themselves in a situation where someone may misjudge their actions.
- Boys & Girls Club staff members/volunteers should not perform frontal hugs with school age children and above – hugs should be from the side. The staff member/volunteer should get down to the child’s physical level when possible. Boys & Girls Club staff/volunteer should not touch children in any body location that would be covered by a bathing suit.

3.3 Babysitting and outside contact
- Staff and volunteers may not have contact with children (under the age of 18) they meet in Boys & Girls Club programs outside of the Boys & Girls Club. This includes babysitting, sleepovers, and inviting children to your home. Any exceptions require a written explanation before the fact and are subject to CEO approval (only prior to Boys & Girls Club employment relationships considered).
- Outside contact includes communication through personal social networking methods – see section 4.4 in this document for more information.
  - This includes but is not limited to:
    - extra practices, coaching, or tutoring
    - transportation in a non-Boys & Girls Club vehicle
    - private special events such as movies, sporting events, or any other similar excursions
    - visits to any residence

3.4 Additional expectations with children –
- State or mandated supervision guidelines will be followed. Minimally, staff should be 16 years of age to supervise a group of children.
- Profanity, inappropriate jokes, sarcasm, gossiping or sharing intimate details of one's personal life, any type of harassment in the presence of children/staff/volunteers is strictly prohibited.
- Tickling, horseplay or roughhousing is not allowed.

4.0 PROGRAM OPERATION

4.1 Bathroom policy
- Regarding the threat of sexual abuse, it is recognized that bathrooms are high risk areas for all children who participate in Boys & Girls Club programs. It is expected that children who are participating in Boys & Girls Club licensed programs are sent to restrooms supervised and in compliance with the “rule of three”. The “rule of three” specifies that there should always be at least three people present, i.e. one employee and two children or two employees and one child. Additional procedures will be in place in other Boys & Girls Club programs whenever possible.
- Use of bathrooms located in program space will be limited to program participants. Staff will ensure that staff and other guests are directed to alternative facilities while children are in these bathrooms.
• Protocols that address the variety of unusual circumstances possible during outdoor or off-site activities shall be established and made part of that program/activity’s operating guidelines.
• Cellphone usage is prohibited in restrooms.

4.2 Ratio Expectations
• At minimum, state guidelines for licensed programs will be followed.

4.3 Program audits
• Announced and unannounced audits will be conducted of all programs.
• The audits will be performed by organization leadership with all programs reviewed by organization leadership at least twice yearly.

4.4 Social Networking
• Staff & volunteers will not exchange personal email addresses or phone numbers with youth participants. Electronic communication will be approved and transparent; staff & volunteers should not be in communication with Boys & Girls Club participants through personal web pages and social networking methods (such as Facebook or MySpace). Instead, official Boys & Girls Club technology (computers, web pages, etc.) that are monitored by an administrator will be utilized for necessary and approved communication.
• Staff/volunteers will not take photos, videos, audios or engage in communication with children via personal cell phones, handheld devices, computers, etc.

4.5 Transportation
• Staff will spread themselves out in the vehicle and maintain their focus on the children while transportation is occurring.
• Staff/volunteers may not transport Boys & Girls Club participants in their own vehicles.
• Field Trips– The risks to children change when they are off-site. In order to protect them from predators that may be at fieldtrip locations additional standards will be enacted. For instance: reducing the ratio of students to staff when programs go off-site;
• children’s changing of clothes should take place at the Boys & Girls Club rather than in public locations; picking up of children should only be allowed if prearranged and recipient will be required to show proof of ID and sign.

4.6 Parental Visits
• The Boys & Girls Club communicates with families about policies/procedures as well as its commitment to the safety of their children.
• Families and parents are encouraged to visit unannounced and observe any program in which their child participates. They are encouraged to express concerns to staff members in charge or a Program Director.

4.7 Pick-up & drop-off procedures –
• Children will be monitored upon entering a program until they have left the program area.
• In regards to licensed child care programs, children will be monitored upon entering the program until they are signed out by an authorized individual providing an ID.
4.8 Security
- Sweeps/walk-throughs of the building are performed frequently.
  - Areas where children’s activities are occurring will be visible-classroom windows, should not be blocked, doors without windows should remain open while room is in use, doors to spaces not in use should be locked, etc.
- Facilities that the Boys & Girls Club owns or uses (schools, parks, places of worship) are designed and maintained for optimum prevention of abuse.
- New construction and renovations will consider plans for creating secure areas for children.
- A visitors who enter the building will be required to show a photo ID, sign a visitor’s log, and wear a visible name badge. A visitor is someone who has a scheduled appointment, performing work or a service, or visiting for purpose of viewing our program.

4.9 Daily Health Check
- It is encouraged that staff/volunteers conduct a health check of each child, each day, as they enter a program noting any fever, bumps, bruises, questionable marks or behavioral changes.
- Any concerns or suspicions of abuse or neglect are reported immediately (as provided in 6.2)

4.10 Staff ID & Uniforms
- All staff will be identifiable by uniform and/or nametag. Any child or adult will be able to distinguish staff from other adults.
- Identification policy/uniform is consistent.

5.0 PARENTAL EDUCATION

5.1 Boys & Girls Clubs of Metro South child protection policy
- The Boys & Girls Club will make available its child protection policy to parents and members. Efforts will be made to distribute summaries and interpret information through pamphlet distribution, Boys & Girls Clubs of Metro South website, and other means necessary. The child protection policy provides parents with information such as the babysitting policy, outside contact policy, electronic communication policy, and information on child abuse.

5.2 Contact information for violation of policies
- Staff will receive training on responding to an allegation, child abuse warning signs, and Boys & Girls Club policies so they can effectively respond to concerns and questions.
- Staff will provide parents with important questions to ask children on a regular basis in order to detect abuse concerns.

5.3 Community education
- Child abuse prevention cannot be successful until the greater community is aware of how to be a guardian of children. The Boys & Girls Club should take advantage of opportunities to become a key resource and leader for its greater community in this area by dispensing knowledge about child abuse

6.0 RESPONDING TO AN ALLEGATION

6.1 Reporting suspicious behavior to a supervisor
- All staff members/program volunteers must receive specific training concerning the requirement to report violations of Boys & Girls Club policies immediately to their supervisor.
- Boys & Girls Club staff/volunteers are expected to observe the behavior of other staff members and volunteers, including that of supervisors, and to report any suspicions to a supervisor/secondary person.
6.2 Mandated reporter
- All Boys & Girls Club staff fall under the MA guidelines of Mandated Reporting and are mandated by law to report all incidents of suspected abuse or neglect of children under the age of 18 (according to MA Law, Chapter 119, Section 51A). Any evidence of potential child abuse or observation of inappropriate contact by a parent, staff member or other child will be reported to the immediate supervisor or CEO which will then report to the Massachusetts Department of Children and Families.

6.3 Suspension of staff or program participant offender
- Any Boys & Girls Club staff member/volunteer who is alleged to have abused a child will be suspended pending the outcome of the investigation.
- If the allegation is against a program participant, she/he will be suspended pending the outcome of the investigation. Depending on the severity of the incident the participant may be terminated from the program.

6.4 Incident investigation
- The Boys & Girls Club will perform an investigation following any allegation of child abuse or inappropriate behavior by a staff member, volunteer, participant or member.

6.5 Parent Notification
- In the event that the accusation or suspicion of child abuse involves the parent, a decision will be made jointly by the CEO and Program Director, as to if, how, when and by whom the family will be notified of the report.
- In the event the reported incident or suspicion involves an employed staff person or volunteer, the parents or legal guardian of the child(ren) involved in the alleged incident will be promptly notified in accordance with the directions of the relevant state or local agency.

6.6 Insurance company contact
- Immediately after an allegation of abuse the Boys & Girls Club will notify its insurance company and the Boys & Girls Club Crisis hotline.

6.7 Record retention
- Following an allegation against a staff member/volunteer, their personnel file will be sealed and locked in a secure location. The file will have no items removed or added. It will only be moved from the locked location at the direction of the CEO.

6.8 Boys & Girls Club of America
- Boys & Girls Clubs of Metro South CEO will contact their Boys & Girls Club Regional Director to apprise them of the situation and next steps in the investigation.

6.9 Counseling
- After an event, the Boys & Girls Club may engage a firm of their choice to provide counseling services to staff and affected children.

Notwithstanding the above, the Boys & Girls Clubs of Metro South complies with all laws that apply to the Commonwealth of Massachusetts.

APPROVED:

Derek W. Heim Date: April 30, 2019
President & Chief Executive Officer