

YMCA of Central Massachusetts

Child Protection

Policies & Guidelines

Child Protection Task Force
Revised August, 2012

Child Protection Plan - Overview

YMCAs of Massachusetts take the prevention of child abuse very seriously. YMCAs understand 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. A Special Commission was established by the YMCAs of Massachusetts to direct statewide efforts regarding child abuse prevention, establishment of recommended policies and guidelines, and the coordination of comprehensive statewide communications and education. The Commission is committed to taking proactive steps to protect children in YMCA programs and facilities, and is proud to offer support and provide resources to YMCAs throughout Massachusetts.

The YMCAs of Massachusetts Child Protection Plan outlines policies within the four elements of screening and hiring, training, supervision, and feedback systems. The YMCAs of Massachusetts Special Commission on Child Protection developed and endorsed the following policies and guidelines to guide YMCAs across the state and minimize the potential for an abuse incident to occur. If an allegation does occur our YMCA will proactively work with the authorities and the family to respond in a prompt and empathetic manner. All relevant policies will be reviewed every 3 years and utilize language that is specific and clear for all staff members.

Consultation with leading authorities and reports from YMCA of the USA, Praesidium, and The Redwoods Group has resulted in the collection of the following policies and guidelines, which are vital to the protection of children in our programs and facilities. A Task Force from the YMCA of Central Massachusetts was convened to review the proposed guidelines and tailor them to our specific YMCA.

Essential Elements of a Child Protection Plan

1. Screening and Hiring

Every YMCA must establish and sustain proper hiring and volunteer selection practices, including completed applications, reference checks, Criminal Background Checks, Social Security checks and documented personnel files.

2. Training

The rules and expectations will be shared with each new employee/volunteer and regularly reinforced with existing staff and volunteers. This should be done in new employee training, abuse prevention training, the use of a comprehensive Code of Conduct and an employee handbook.

3. Supervision

Through day-to-day interaction, unannounced visits, regular audits and performance reviews you and your leaders should know if your staff and volunteers understand and are following all of the association protocols.

4. Feedback System

No matter how well you supervise your staff/volunteers, you can't see everything all of the time. It's very important to instruct your 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 your programs to know and understand the Code of Conduct so that they can "help you supervise." Parents should be educated and then encouraged to ask their children about issues such as bathroom procedures, what happens on the bus and, ultimately, if anything is making them uncomfortable at the YMCA. Feedback and community involvement are vital components of staff supervision and abuse prevention.

1.0 Screening and Hiring Practices

1.1 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 YMCA 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 out of state applicants with Lexus Nexus.

1.3 Criminal record checks –

- The YMCA will conduct a search for criminal activity by any prospective staff member or 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.
- Applicants who are returning staff will receive a new check if they have been away from YMCA for more than 90 days.
- It is recommended that a CORI is conducted annually for all staff (biannually at minimum). In order to request another CORI, the staff member/volunteer must sign and complete the form again (according to Criminal History Systems Board).
- A conviction does not automatically generate a rejection of the application – all cases are individually evaluated. All CORIs that have issues need to be reviewed with another designated person (i.e. HR, CEO, Supervisors). Note: If someone is not hired due to CORI results, they are entitled to a copy of the results.

1.4 Reference checks –

- The YMCA will contact a minimum of three references for all prospective staff and volunteers, one of which must be a close family member to the applicant.
- The reference's responses will be documented on an association-approved form that specifies questions for uniformity of evaluation. Please see the Tools for Implementation Manual for a sample reference check form.
- Past employers will be asked if the person is eligible for rehire, as well as specific questions about the ability of the applicant to work with children.
- If the applicant lists prior child-related volunteer experience, these agencies should be contacted for references as well.
- Written references will be accepted only with verbal verification by the YMCA. If the written reference did not address the questions recommended, those questions will be asked during the telephone contact.
- Reference checks must be completed by the hiring supervisor or human resources, and all forms must include the date and the printed name and signature of the supervisor/HR employee who completed it.

1.5 Interviews –

- Prospective staff members should be interviewed by at least two separate staff members.
 - A 'Realistic Job Preview' or 'Working Interview' meets this requirement; it is important that the candidate is assessed by more than one staff member.
- All interviews will be documented on an association approved interview form that ensures consistency of questions asked. The YMCAs of Massachusetts interview evaluation form may be used during the interview process.
- During all interviews the prospective staff member will be asked to read the YMCA Code of Conduct and verify that they are in agreement with its purpose and that they will abide by its standards if hired.

1.6 Web Search –

- The YMCA will take steps to research a candidate online and check for red flags for working with children (i.e. Google Search, national sexual predator web sites, and social networking sites)

2.0 Training and Education Procedures

2.1 Code of Conduct –

- Staff members/volunteers will sign and date a copy of the Code of Conduct prior to performing any work duties and annually thereafter.
- 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.
- All departments will review and sign the Code of Conduct during October each year and will have all staff/volunteers reconfirm that they understand their expectations as YMCA staff members and agree to abide by those expectations.

2.2 Child abuse prevention training –

- All staff members (at minimum, all staff members/volunteers working directly with youth) will participate in a comprehensive child abuse prevention training within 30 days of hire that includes information on Sexual abusers, Prevention, Recognition, Responding, Documenting, and Reporting.
 - Camp Staff must go through training prior to the start of camp.
- Any staff member who does not complete the training as required may be suspended and/or terminated.
- All staff members will undergo a review of the Child Protection Policies & Guidelines on an annual basis.

2.3 Electronic communication policy –

- An electronic communication / social media policy will be reviewed with all staff/volunteers before their regular duties begin.

2.4 Follow-up training –

- At minimum, all staff/volunteers working with children are required to participate in an annual review of the abuse prevention training and reporting.
- The YMCA is encouraged to provide additional training on identification and prevention of child abuse throughout the year.

2.5 Train the trainer –

- All staff responsible for hiring need to be trained in the organization's policies. The appropriate point person should, minimally on an annual basis, review and update all hiring policies with those responsible for hiring staff.
- It is important that supervisory staff (those at the director/exempt level) have gone through basic supervision/management training within one year of hire or promotion.

3.0 Staff Expectations

3.1 Supervision in structured YMCA programs –

- In order to protect YMCA staff, volunteers, and program participants, at no time during a YMCA program should a staff person/volunteer be alone with a single child where they cannot be observed and/or interrupted by others. It is recognized that offsite/remote programs pose a great risk, so specific attention will be given to these programs. Ways to overcome any facility layout barriers will also be taken into consideration.
- The YMCA will design and structure its programs to limit the potential for a staff member to be in a 1-to1 alone situation with a child. The YMCA is aware of the risk of abuse, and will evaluate and manage individual programs accordingly.
- All children who are participating in licensed programs will be monitored by YMCA staff during the period/activity time. This includes bathrooms, locker rooms and changing areas. For unlicensed programs, the YMCA will apply various controls and monitor these areas as well.

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.
 - YMCA staff members/volunteers are discouraged from performing frontal hugs of children unless developmentally appropriate. Hugs should be from the side. The staff member/volunteer should get down to the child's physical level when possible. YMCA staff/volunteer should not touch children in any body location that would be covered by a bathing suit. Exceptions include diapering and swim lessons. It is expected that staff will follow the guidelines for affection/touching during these activities.

3.3 Babysitting and outside contact –

- Staff and adult volunteers will refrain from any interactions with children under eighteen years of age that are participants in programs of the YMCA outside of the program activities. An exception to this policy is if there is a pre-existing relationship between staff and the family. Both parties will be required to sign a form acknowledging the family's pre-existing relationship with the staff member and relieving the YMCA of any responsibility for the actions of the staff member with regard to that relationship. Please see the Tools for Implementation Manual for pre-existing relationship forms and an accompanying waiver.

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- **Revised Statement for Code of Conduct**
In an effort to become the employer of choice, we support relationship building with staff and their families. However, as an employee of the YMCA of Central Massachusetts you agree that you are entering into these relationships on your own accord and agree not to hold the YMCA of Central Massachusetts liable for any negligence/incidents that may occur to either staff or staff's children outside of the YMCA
- **Outside contact includes communication through personal social networking methods**
- **YMCA staff shall not provide care (babysit) or instruction or develop/maintain relationships outside the YMCA with any children or families they meet through YMCA programs. This includes but is not limited to:**
 - extra practices, coaching, or tutoring
 - transportation in a non-YMCA vehicle
 - private special events such as movies, sporting events, or any other similar excursions
 - visits to any residence

3.4 Diapering Policy –

- **When diapering a child, staff should have another staff member in the room and be in a visible area of the room.**
- **When assisting a young child with bathroom duties, staff members will not close doors to the bathroom or stall so they can be observed.**

3.5 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 are not allowed**

4.0 Program Operation

4.1 Bathroom policy –

- **Regarding the threat of sexual abuse, it is recognized that bathrooms and locker rooms are high risk areas for all children who participate in YMCA programs. It is expected that children who are participating in YMCA licensed programs are sent to locker rooms/restrooms supervised according to the association's bathroom policy 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 should be in place in other YMCA programs whenever possible.**
- **The buddy system or three children together are not acceptable practices and should not be permitted in licensed programs at the YMCA.**
- **Use of bathrooms in licensed programs should be limited to program participants. Staff will ensure that members or 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.**

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. These audits will directly review abuse prevention practices.
- The audits will be performed by branch and association leadership with all program areas reviewed by association leadership at least twice yearly.

4.4 Regular computer audits –

- When possible, regular software scans and webpage restrictions for illicit materials will be installed and run.

4.5 Social Networking –

- Staff & volunteers will not exchange personal email addresses or phone numbers with youth participants. Electronic communication should be approved and transparent; staff & volunteers should not be in communication with YMCA participants through personal webpages and social networking methods (such as Facebook or MySpace). Instead, official YMCA pages that are monitored by an administrator should be utilized.
- Staff/volunteers will not take photos, videos, audios or engage in communication with children via personal cell phones, handheld device, computer, etc. without appropriate authorization.
- Exceptions for teen programs will be dealt with on a case-by-case basis; guidelines will be established by each YMCA.
- Staff/volunteers may not engage in any internet activity that would reflect unfavorably on the YMCA or be deemed inappropriate by the association.

4.6 Transportation –

- Staff will spread themselves out in the vehicle and maintain their focus on the children while transportation is occurring.
- A monitor (in addition to the driver) will be on the bus. A monitor will be present in van whenever possible.
- When possible, children will be seated according to age, gender, and behavior and monitored constantly.
- Staff/volunteers may not transport YMCA 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 YMCA rather than in public locations; picking up of children should only be allowed if prearranged and recipient should be required to show proof of ID and sign the child out.

4.7 Parental Visits –

- The YMCA 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.

4.8 Pick-up & drop-off procedures –

- Children will be monitored upon entering a program until they leave the premises of the program.
- It is recommended by the YMCA of Central Massachusetts that program participants are escorted to and from YMCA programs by a Parent or Guardian.
- Where applicable, an authorized individual must sign the child in and out of a YMCA program, providing ID (i.e. Child Watch, all licensed programs and Camp).

4.9 Security –

- Sweeps/walk-throughs of the facility are performed frequently.
 - Areas where children’s activities are occurring should 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 YMCA 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.

4.10 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)

4.11 Staff ID & Uniforms –

- All staff should be identifiable by uniform and/or nametag. Any child or adult should be able to distinguish staff from other adults.
- Identification policy/uniform should be consistent across an association.

4.12 Expectations around children –

- People who talk in a sexual manner, perform sexual gestures, sexual acts, or attempt inappropriate contact with a child will have their membership suspended or terminated depending on the degree of the offense.
- The police may be contacted, if warranted.
- No use of cameras or cell phones is allowed by anyone in the changing/bathroom areas. YMCAs should establish and evaluate regulations for camera/phone use on pool decks and in swimming areas.

5.0 Parental Education

5.1 YMCA child protection policy –

- The YMCA will provide its child protection policy to parents via the branch program guides and the association website. Additionally, licensed child care programs will distribute child protection policies in parent handbooks. The child protection policy provides parents with information such as the babysitting policy, outside contact policy, electronic communication policy, and information on child abuse.
- Contact information for at least two appointed staff members will be shared in case a parent has questions, concerns, or observes a violation.

5.2 Contact information for violation of policies –

- The association or branch will provide information for both male and female staff contacts within the association whom parents can call in case of concern. This ensures that all concerns can be centralized and fielded consistently.
- Staff will receive training on responding to an allegation, child abuse warning signs, and YMCA policies so they can effectively respond to concerns and questions.

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 YMCA 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 and offering prevention workshops or training sessions for community members.

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 YMCA policies immediately to their supervisor.
- YMCA 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 YMCA 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 Massachusetts Department of Children and Families.

6.3 Suspension of staff or program participant offender –

- Any YMCA 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, s/he may 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 YMCA 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 Branch Executive Director/designee, CEO, COO 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 YMCA will notify its insurance company.**

6.7 Record retention –

- **Following an allegation against a staff member/volunteer, their personnel file or files 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 HR., CEO or a licensing authority (EEC and/or DCF).**

6.8 Working with the media –

- **The YMCAs of MA recommends the media plan outlined by Bishoff Communications. When the plan is activated, only the individuals identified in the plan should speak with members of the media. The YMCA will develop a media statement.**

6.9 YMCA of the USA –

- **The YMCA CEO will contact their YMCA of USA Resource Director to apprise them of the situation and next steps in the investigation.**

6.10 Counseling –

- **After an event, the YMCA may engage a firm of their choice to provide counseling services to staff and affected children.**