

# Medfield Community Cable Access Corporation

## Youth Protection Policy

### Introduction

Medfield Community Cable Access Corporation (MCCAC) seeks to provide a safe and secure environment for the youth who participate in our programs and activities. By implementing the below practices, our goal is to protect the children of MCCAC from incidents of misconduct or inappropriate behavior. We strive to ensure that everyone involved in our programs remains safe and has a positive experience.

### Definitions

For the purposes of this policy, each of the following terms has the meaning assigned to it.

51A Report – A verbal report made to the Department of Children and Families immediately following suspected or alleged abuse of a child.

Abuse - This definition is not dependent upon location. Abuse can occur while the child is in an out-of-home or an in-home setting.

1. The non-accidental commission of any act by a caregiver which causes or creates a substantial risk of physical or emotional injury or sexual abuse of a child; or
2. The victimization of a child through sexual exploitation or human trafficking, regardless if the person responsible is a caregiver.

Adult(s) – Any person or persons who are eighteen (18) years of age and older.

Child(ren) – Any person or persons who are under the age of eighteen (18) years.

Compliance Officer – Designated as the Executive Director of MCCAC. Please see *Compliance* below for additional information.

MCCAC Individual(s) – Any person or persons who:

- Are employees of MCCAC
- Are board members of MCCAC
- Work directly with children on behalf of MCCAC
- Are interns or others who may conduct youth programming on behalf of MCCAC

Molestation - Abusive sexual behavior by one person upon another. It is often perpetrated using force or by taking advantage of another.

Sexual Abuse – Any non-accidental act by a caregiver upon a child that constitutes a sexual offense under the laws of the Commonwealth or any sexual contact between a caregiver and a child for whom the caregiver is responsible.

Sexual Exploitation - Knowingly using or influencing a youth to engage in sexual activity, including viewing pornography, for the sexual arousal of an adult or for the purpose of photographing or recording the activity. Sexual exploitation also includes displaying, distributing, selling, or possessing child pornography. A youth is abused or exploited through any of the above actions whether the activity involves explicit force, involves physical contact, is initiated by the youth, or produces a discernible harmful outcome.

Youth – See “*Child(ren)*” above.

## **Compliance**

MCCAC, as part of its Youth Protection Policy, is responsible for appointing a Compliance Officer, typically the Executive Director or their designee. The Compliance Officer ensures the organization is acting in accordance with any requirements outlined in this policy. They are also responsible for designing and implementing internal controls, policies, and/or procedures to assure compliance with the internal policy and any outside parties. The Compliance Officer audits each outside entity to ensure they are following the policy guidelines, ensures that any reports/incidents are handled appropriately and in a timely manner, and responds to requests for information from internal and external clients.

Other duties of the Compliance Officer include but are not limited to:

- Conducting or providing orientation and training of internal new hires
- Conducting or providing regularly recurring re-training of persons working directly with children on behalf of MCCAC
- Maintaining a log of individuals trained and completion dates
- Ensuring that regularly recurring background checks are conducted internally or externally, as defined in the *MCCAC CORI Policy*
- Notifying the MCCAC President and board of directors of any incident reports
- Maintaining a log of any incident reports
- Maintaining an attendance log for all MCCAC Youth Media Program classes, workshops, and seminars
- Complete training in and regularly re-train on sexual and discriminatory harassment prevention efforts, such as Title IX training

## **Orientation and Training of Internal New Hires**

All internal new hires will be provided with training during their new hire orientation within one month of hire, but always prior to working directly with children.

Orientation/Training will cover:

- Employee's obligations regarding reporting incidents of child sexual molestation and abuse
- The proper care for a victimized child
- The process for reporting to the proper authorities and notification of Compliance Officer and MCCAC
- Understanding what signs to look for in a child who may have been abused or neglected (<https://www.mass.gov/info-details/warning-signs-of-child-abuse-and-neglect>)
- Two Adult Rule, Open Door Policy, and Discipline Policy

## **Two Adult Rule**

The Two-Adult Rule requires that no fewer than two unrelated adults will be present when with a child. This protects the child by significantly reducing the risk of an incident of abuse and it protects an adult against false accusations. It also provides additional support if there is an accident or emergency. We do not allow minors to be alone with one adult on our premises or during any sponsored activity.

## **Open Door Policy**

Classroom doors must remain open unless there is a window in the door or a side window beside it. Doors should never be locked while persons are inside the room.

## **Discipline Policy**

MCCAC Individuals must not administer corporal punishment, even if parents or guardians have suggested or given permission for it. There will be no spanking, grabbing, hitting, or other physical discipline of children. MCCAC Individuals should consult with the Executive Director if assistance is needed with disciplinary issues. We expect that all children and MCCAC Individuals will treat one another with respect.

## **Background Checks**

At minimum, all MCCAC Individuals working directly with youth will be subject to Massachusetts Criminal Offender Record Information (CORI) background checks on a regularly recurring basis. All background checks resulting in a positive finding of sexual abuse or molestation conviction will result in that individual being permanently banned from working or volunteering in the organization.

Findings on CORI background checks do include supported allegations from a Department of Children and Families (DCF) investigation in Massachusetts. CORI does not include 51A reports of child abuse or neglect made to DCF.

Background checks will be conducted by iCORI, a service of the Commonwealth of Massachusetts and the Massachusetts Department of Criminal Justice Information Services (DCJIS). Please see the *MCCAC CORI Policy* for additional information regarding background checks.

## Incident Reports

If an incident of abuse or neglect is alleged to have occurred at MCCAC or during our sponsored programs of activities, the following procedure shall be followed:

1. In accordance with the law of the Commonwealth of Massachusetts, MCCAC Individuals **must** immediately report any and all incidents, suspected incidents, or allegations of molestation or abuse to the Department of Children & Families (DCF) by calling **800-792-5200** (<https://www.mass.gov/how-to/report-child-abuse-or-neglect>). Individuals will immediately report any and all incidents, suspected incidents, or allegations of molestation or abuse to the proper local authorities and the Compliance Officer. It is not the responsibility of the individual to decide if an incident is valid, truthful, or worth reporting. This determination will be made by local authorities.
2. The Compliance Officer will immediately notify the child's parent or guardian and the MCCAC board of directors.
3. The MCCAC Individual must fill out an Incident Report Form. This form must be completed and submitted to the Compliance Officer immediately and no more than 24 hours after the incident occurs or is brought to the attention of the Individual.
4. The insurance company will be notified and the Compliance Officer, MCCAC board of directors, or designee will complete an incident report. Any documents received relating to the incident and/or allegations will immediately be forwarded to the insurance company.
5. The MCCAC board of directors will designate a spokesperson to the media concerning incidents of abuse or neglect. The advice of legal counsel will be sought before responding to media inquiries or releasing information about the situation. All other representatives of the organization should refrain from speaking to the media.

6. Any person who is not found innocent of the alleged abuse or misconduct will be removed from their position working with children or youth.

All those participating in or instructing a MCCAC Youth Program class, workshop, and/or seminar must read, agree to, and fully understand the contents of this policy and must sign a waiver that will be provided to them prior to the event. Interested parties will not be given permission to participate in any event where children are present without signing the waiver.

***If a child is in immediate danger, call 911.***