



**BOYS & GIRLS CLUB**  
OF GREATER NASHUA

# **Boys & Girls Club of Greater Nashua Child Protection Policy and Screening & Hiring Policy**

Revised February 19, 2019

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## **PREAMBLE**

The Boys & Girls Club of Greater Nashua takes the prevention of child abuse very seriously. The BGC 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 BGC of Greater Nashua is committed to taking proactive steps to protect children in BGC programs and facilities.

The Boys & Girls Club of Greater Nashua Child Protection Policy outlines policies within the four elements of screening and hiring, training, supervision, and feedback systems. If an allegation does occur the BGC 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.

## **SUMMARY**

### **1. Screening and Hiring**

The Boys & Girls Club of Greater Nashua 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.

### **2. 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 Ethics and HR Policies & Procedures.

### **3. 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.

### **4. 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 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 BGC. 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 BGC 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 Club of Greater Nashua will conduct a search for criminal activity by any prospective staff member or volunteer. A search will be completed on the National Criminal Records file, the State of Residence Sexual Offender file, National Sexual Offender Registry, Social Security Number verification and Motor Vehicle Record (employee only). 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 the BGC for more than 12 months. The organization reserves the right, as a condition of employment, to require a Criminal Background Investigation at any time at its discretion.
- A Criminal Background Investigation is conducted once annually for all staff
  - In order to request another Criminal Background Investigation, the staff member/volunteer must sign and complete the consent form again.
- Child care staff in licensed New Hampshire Early Education and Care programs, i.e. Kids Club, are required to have fingerprinting and background investigations completed by the NH State Police which will be completed prior to beginning work.
- A conviction does not automatically generate a rejection of the application – all cases are individually evaluated. All Criminal Investigation 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 Criminal Background Investigation 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 BGC of Greater Nashua will contact a minimum of two references for all prospective staff and volunteers on an assignment longer than 90 days.
- The BGC of Greater Nashua will contact a minimum of two references for all prospective volunteers working directly with children.
- The references' 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.
- Applicants will be asked if they have prior Boys & Girls Club experience. If so, all Boys & Girls Clubs listed will be contacted for a reference check.

- 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 BGC.
- BGC'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.
- BGC of Greater Nashua staff should not be releasing any personal information in regards to staff. Refer questions and inquires to the Chief Executive Officer.

### **1.5 Interviews -**

- Licensed Child Care interviews will be documented on an organization approved interview form that ensures consistency.

### **1.6 Web Search-**

- The Boys & Girls Club of Greater Nashua's hiring managers 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 Ethics - Located in Paylocity**

#### **2.2 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.

#### **2.3 Child abuse prevention training -**

- All staff members will complete an online child abuse prevention training within 30 days of date of hire...

#### **2.4 Electronic communication policy -**

- See Employee Handbook. This policy as well as other HR policies will be given to all staff to review prior to working.

#### **2.5 Follow-up training -**

- All youth development staff will be offered additional training on identification and prevention of child abuse throughout the year.

## **3.0 Staff Expectations**

### **3.1 Supervision in structured BGC programs -**

- In order to protect BGC staff, volunteers, and program participants, at no time during a BGC program at the club 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 BGC staff during the period/activity time. This includes bathrooms, locker rooms and changing areas. For unlicensed programs, the BGC 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.
  - BGC 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. BGC staff/volunteer should not touch children in any body location that would be covered by a bathing suit.

### **3.3 Outside contact –**

- Staff and volunteers are discouraged from contact with children (under the age of 18) they meet in BGC programs outside of the BGC. This includes but is not limited to:
  - extra practices, coaching, or tutoring
  - transportation in a non-BGC vehicle
  - private special events such as movies, sporting events, or any other similar excursions
  - visits to any residence

Any exceptions should be brought to the attention of the BGCGN for CEO approval (only prior to BGC employment relationships considered).

- Outside contact includes communication through personal social networking methods –see section 4.3 in this document for more information.

## **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 BGC programs. It is expected that children who are participating in BGC licensed programs are sent to restrooms in compliance with New Hampshire state licensing guidelines.
- 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.
- Adult bathrooms are located on the lower level between the gym and pool, a key is necessary. Single stall bathrooms designated for adult use are located in the Stahl Teen Center and Management Office. Please ask permission before using the single stall bathroom located in the Kids Club.
- 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 Social Networking –**

- Staff will not exchange personal email addresses or phone numbers with youth participants unless authorized by a supervisor.
- 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 BGC participants through personal web pages and social networking methods (such as Facebook or MySpace). Instead, official BGC 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. unless approved by supervisors.

#### **4.4 Transportation –**

- Only transport Club members in Boys & Girls Club of Greater Nashua busses or vans. When transporting a Club member, try to plan a route that does not leave you transporting one child alone. Do not transport a child alone in your personal vehicle unless you have approval from the Chief Executive Officer, Chief Operating Officer or the supervisor in charge of the building. See Complete Transportation Procedures located on the Boys & Girls Club Staff website.

#### **4.5 Parental Visits –**

- 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.

#### **4.6 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.

#### **4.7 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 BGC 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.

#### **4.8 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)

#### **4.9 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 Club of Greater Nashua child protection policy –**

- The BGC will make available its child protection policy to parents and members.

### **5.2 Contact information for violation of policies –**

- Staff will receive training on responding to an allegation, child abuse warning signs, and BGC policies so they can effectively respond to concerns and questions.

### **5.3 Community education –**

- The BGC 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 will receive specific training concerning the requirement to report violations of BGC policies immediately to their supervisor.
- BGC 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 BGC staff fall under the NH 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 the state of NH. 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. The appropriate staff person will then report to the Division for Children, Youth and Families (DCYF) in accordance with New Hampshire Law (RSA 169-C:29)

### **6.3 Suspension of staff or program participant offender –**

- Any BGC 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 BGC will perform an investigation following any allegation of child abuse or inappropriate behavior by a staff member, volunteer, participant or member.
- BGC will follow procedures in its Crisis Management Plan's, Crisis Notification Plan.

### **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 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.

**6.7 Boys & Girls Club of America -**

- Boys & Girls Club of Greater Nashua CEO will contact their BGC Regional Director to apprise them of the situation and next steps in the investigation when appropriate.

**6.8 Counseling -**

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

Notwithstanding the above, the Boys & Girls Club of Greater Nashua complies with all laws that apply to the state of New Hampshire.

This policy was developed in January 2016 by the BGCGN Safety Committee, et al. as per the below. It will be reviewed annually by the BGCGN Safety Committee.

- Norman Bouthilette, CEO
- Kurt Norris, COO
- Catherine Klisz, Bookkeeper/Benefits Administrator
- Jonathan Shirley, Board Member Chair, BGCGN Safety Committee
- Teresa Gartner, Board Member
- Beth Kreick, Board Member
- Lisa Van Biene, Board Member
- Justin Kates, Director of Emergency Response-City of Nashua
- Matt Chigas, Office of Emergency Management - City of Nashua
- Carlos Camacho, Nashua Police Department
- Adam Pouliot, Fire Marshall - City of Nashua
- Mark Rapaglia, Assistant Superintendent - Fire Marshall's Office - City of Nashua
- Doug Garner, Vice President of Safety, Health & Environmental Electronic Systems - BAE Systems

APPROVED:

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Norman Bouthilette, Chief Executive Officer

Date: \_\_\_\_\_

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Jonathan Shirley, Board Member Chair

Date: \_\_\_\_\_

