



**BOYS & GIRLS CLUBS
OF METRO SOUTH**

Boys & Girls Clubs of Metro South Child Protection Policy



BOYS & GIRLS CLUBS OF METRO SOUTH

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PREAMBLE
v. 1/1/2026

Boys & Girls Clubs of Metro South (BGCMS) takes the prevention of child abuse very seriously. We 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. BGCMS is committed to taking proactive steps to protect children in Club programs and facilities.

The priority of BGCMS is the physical and emotional safety of its members, staff, and volunteers. BGCMS maintains a zero-tolerance policy for child abuse. BGCMS implements policies and procedures for members, employees, volunteers, visitors or any victims of sexual abuse or misconduct to report any suspicion or allegation of abuse.

BGCMS's Child Protection Policy outlines policies within the four elements of screening, hiring and onboarding, ongoing training and professional development, prevention and supervision, and feedback and reporting systems. If an allegation does occur, BGCMS will proactively work with the authorities and the family to respond in a prompt and empathetic manner. All relevant policies will be reviewed every year and utilize language that is specific and clear for all BGCMS stakeholders.

Additionally, BGCMS has established and will maintain a Safety Committee that is chaired by an active board member, leads the organization's safety agenda and must:

- Meet at least three times each year.
- Implement solutions to ensure the safety of all members, employees, volunteers and visitors.
- Verify the organization's submission of an annual online safety assessment.
- Review the results of all safety assessments to identify areas for improvement.
- Review the organization's safety policies.
- Submit Safety Committee chair's name and contact information annually to BGCA.

These policies can be found on our website and parent information portals as provided upon membership.

SUMMARY

Screening, Hiring & Onboarding

BGCMS 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.

Ongoing Training & Professional Development

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 hire orientation, abuse prevention training, the use of a comprehensive Code of Conduct and HR Policies & Procedures.

Child Abuse Prevention & 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 and Reporting Systems

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 BGCMS and, ultimately, if anything is making them uncomfortable at BGCMS. Feedback and community involvement are vital components of staff supervision and abuse prevention.

1.0 SCREENING & HIRING PRACTICES

1.1 Hiring Practices

- BGCMS understands the importance of Youth Development Professionals (YDP's) and their role in relationship building with BGCMS members.
- BGCMS is an employer who looks to attract top talent in our space and ensure all staff meet the accountability and professionalism standards set forth by our organization.
- All prospective staff must meet minimum age requirements to serve in roles/departments within the organization:
 - YDP's working with youth younger than 12 years of age must be a minimum of 18 years of age.
 - YDP's working with teens older than 13 years of age must be a minimum of 21 years of age.
 - Minor YDP's are youth under the age of 18 who are employees of BGCMS and are NOT participating in a work-based learning program through BGCMS. Employment is intended to meet BGCMS staffing needs and BGCMS is the primary beneficiary. The only Minor YDP's eligible for hire in the organization are as follows:
 - Lifeguards (Ages 16-17)
 - Camp Jr Counselors (Ages 16-17)
 - Youth Sport Coaches/Referees (Ages 16-17)
 - Nutrition Kitchen Aides
 - Minor YDP's must complete a five hour in-person training series for minor employee's facilitated by the supervisor of the Minor YDP. They are paid through BGCMS payroll systems and minimum wage laws apply.
 - The supervisor of Minor YDP's must complete annually a training series as outlined through BGCA membership requirements.
 - BGCMS is committed to ensuring that youth workers understand the safety implications of working in the Club. All youth workers, including minor employees and work-based learning participants, will participate in the required number of hours of safety training each year before they work with any Club members. These trainings meet the requirements for child sexual abuse prevention, grooming prevention, and mandated reported trainings for youth workers. These trainings will be incorporated into the onboarding of youth workers. After participating in these trainings, youth workers at a minimum will:
 - Know their rights and responsibilities as a youth worker at the Club.
 - Understand their role as a youth worker and expectations around safety.
 - Understand how to report concerns about issues perceived to affect

- emotional and physical safety.
- Know and implement organization-wide rules and policies that pertain to safety.
 - Understand their role in supervising other youth.
- BGCMS ensures that all supervisors and coordinators of youth workers understand their rights and responsibilities. All Club staff who supervise or coordinate the youth worker program, or work directly in the same space as youth workers – which includes minor employees, work-based learning participants and non-member teen volunteers – shall complete Boys & Girls Clubs of America-developed training annually, after which they will:
 - Understand and communicate the roles and responsibilities of minor employees, volunteers and work-based learning participants.
 - Provide leadership, supervision, training and coaching to staff as relates to organizational role, responsibilities, policies and procedures for youth workers.
 - Maintain current knowledge about, communicate and follow child labor laws.
 - Assess the individual and collective strengths of youth workers against the knowledge, skills and information needed to fulfill their roles safely.
 - Identify and implement training for youth workers to ensure they understand and can implement their role.
 - Prepare and supervise youth workers for their roles in the Club
- Minor Work-Based Learning Participants are youth ages 14-18 taking part in a job-readiness program that occurs in the BGCMS workplace (or other approved sites) to develop employability skills and guided real-world work experience. Participation is intended to build developmental and workforce-readiness skills and the young person in the primary beneficiary.
 - Minor Work-Based Learning Participants must complete a ten hour in-person training series for work-based learning participants and required documentation of participation from a parent/guardian which is facilitated by the Director of Career and Workforce Development. They are paid through a stipend and NOT through the BGCMS payroll systems.

1.2 Applications

- All prospective staff members/program volunteers will complete an application to work or volunteer programmatically that includes questions regarding past work history, volunteer experience, and education.
- All prospective policy & non-programmatic volunteers will complete a volunteer application that includes questions regarding past work history, volunteer experience, and education.
- Application will include a statement that BGCMS has a zero-tolerance standard for abuse and inappropriate behavior by all.

- All applications will be completed 100%, signed by the individual and maintained in their employment or volunteer file.

1.3 Performance of Criminal Background Checks

- BGCMS shall secure criminal background checks on all staff (including minors), program volunteers, non-programmatic volunteers, and policy volunteers. Such background checks shall be secured prior to employment, volunteer engagement or other affiliation and at least once every 12 months thereafter.
 - Name-or fingerprint-based record searches may be used in any combination but shall, at minimum:
 - Verify the person's identity and legal aliases through verification of a Social Security number;
 - Provide a national Sex Offender Registry search;
 - Provide a comprehensive criminal search that includes a national search; and
 - Provide a comprehensive local criminal search that includes a statewide or county-level criminal search, depending on jurisdiction.
 - These requirements must also be shared with BGCMS's background check provider.
- Applicants who are returning staff or volunteers will receive a new check if they have been away from BGCMS 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.
- For any childcare staff in licensed Massachusetts Early Education and Care programs a complete EEC Background Record Check and fingerprinting will be completed prior to beginning work.

1.4 Applying Background Check Findings

- In accordance with state and federal laws, all background check findings shall be considered by BGCMS when making employment or volunteer decisions. BGCMS is prohibited from hiring or engaging staff (including minors), program volunteers, non-programmatic volunteers, and policy volunteers or continuing to employ or engage those who have direct, repetitive interaction with youth if such individual:
 - Refuses to consent to a criminal background check;
 - Makes a false statement in connection with such criminal background check;
 - Is registered or required to be registered on a state or national sex offender registry;
 - Has been convicted of a felony consisting of, but not limited to:
 - Murder
 - Child abuse
 - Domestic violence
 - Abduction or human trafficking
 - A crime involving rape or sexual assault
 - Arson
 - Weapons
 - Physical assault or battery
 - Drug possession, drug use or distribution of drugs in the last five years; or
 - Has been convicted of any misdemeanor or felony against children, including child pornography.
- 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.

1.5 Reference Checks

- BGCMS will contact a minimum of four references for all prospective staff, one of which must be a close family member to the applicant.
- BGCMS will contact a minimum of two references for all prospective program volunteers, one of which must be a close family member to the applicant.
- References are not required for non-programmatic volunteers and policy volunteers.
- The reference's responses will be documented on an approved form that specifies questions for uniformity of evaluation.
- Past employers including those with BGCMS and other youth service agencies will be asked if the person is eligible for rehire.
- If the applicant lists prior child-related work or volunteer experience, these

agencies will be contacted for references as well regardless if listed on applications or reference lists.

- Written references will be accepted only with verbal verification by BGCMS.
- BGCMS will be contacted if there is past employment listed on the application/resume.
- Reference checks must be completed by the hiring supervisor, HR, or an approved designee.
- BGCMS staff should not be releasing any personal information regarding staff. Refer questions to the Senior Director of Human Resources. Generally speaking, BGCMS will only provide dates of employment/volunteer service and most recent pay profile information.

1.6 Interviews

- All organizational hires must be approved by the BGCMS leadership prior to hiring. Whenever possible prospective staff will be assessed by more than one staff member.
- All interviews and prospective employees/volunteers must include a BGCMS interview form and mandatory question bank.
- During all interviews prospective candidates will be provided a copy of our Child Abuse Prevention – CODE OF CONDUCT to ensure their understanding of the organizational requirements in working for the BGCMS environment.

1.7 Web Search

- The BGCMS will take steps to research a candidate online and check for red flags for working with children.
- The BGCMS will take steps to perform a Google search on the applicant's full name.
- The BGCMS will take steps to perform a common search of social networking sites for an individual's outside engagement, behaviors, and intentions.
- The BGCMS will additionally perform the above annually during its background check review period.

2.0 TRAINING & EDUCATION PROCEDURES

2.1 Code of Conduct

- All staff (including minors), program volunteers, non-programmatic volunteers, and policy volunteers will sign and date a copy of the Child Care Code of Conduct at time of hire.
- All new staff (including minors), program volunteers, non-programmatic volunteers, and policy volunteers will have the code of conduct reviewed with them at the time of signing.
- The code of conduct will be maintained in the employment/volunteer file.

2.2 Child Abuse Prevention Training

- Grooming is prohibited in any form and is defined as a deliberate and often gradual process by which an adult or older young person builds trust with a child or young person in order to exploit, abuse, or harm them. It may occur online or in person and can involve excessive attention, gift-giving, secrecy, manipulation, or attempts to isolate the child from trusted adults or peers. Grooming can be difficult to identify, as it often appears friendly or supportive at first. All staff and volunteers have a responsibility to be alert to the signs of grooming, to maintain professional boundaries at all times, and to report any concerns immediately in line with this child protection policy, prioritizing the safety and wellbeing of the child or young person.
- All staff (including minors), program volunteers will complete an online child abuse prevention training prior to the start of employment/volunteer engagement. This includes components of abuse prevention, mandated reporting, grooming (manipulation) training.
- All staff (including minors), program volunteers working with children and any 20+/hour per week staff will participate in a comprehensive child abuse prevention training during time of hire. This includes further components of abuse prevention, mandated reporting, grooming (manipulation) training.
- 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.

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 staff will receive additional training on identification and prevention of

child abuse throughout the year through various platforms including both online and in-person training.

2.5 Train the Trainer

- All staff responsible for hiring needs to be trained in the organization's policies. 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 BGCMS Programs

- In order to protect BGCMS staff (including minors), program volunteers, non-programmatic volunteers, and policy volunteers, at no time during a BGCMS program should a staff member (including minors), program volunteers, non-programmatic volunteers, and policy volunteers be alone with a single child where they cannot be observed and/or interrupted by others.
 - One-to-one contact between adults and children or young people is not permitted under any circumstances. All interactions must take place in open, visible, and supervised settings. Any breach of this rule will be treated as a serious safeguarding concern and managed in line with this policy.
 - The only exceptions to this policy are our Youth Resource Directors (YRD's) who provide 1:1 counseling and support services to youth in need of emotional or behavioral counseling. Our YRD's have specific training and credentials that permit them to do so.
 - The offices of our YRD's are equipped with a camera and a windowed door for additional safety.
- All children who are participating in programs will be monitored by BGCMS staff during the period/activity time. This includes bathrooms, locker rooms and changing areas.
- The BGCMS 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 (including minors), program volunteers, non-programmatic volunteers, and policy volunteers should not place themselves in a situation where someone may misjudge their actions.
- Every staff (including minors), program volunteers, non-programmatic volunteers, and policy volunteers, is required to maintain appropriate physical and verbal contact with minors. Appropriate and inappropriate interactions include but are not limited to the following:

Appropriate	Inappropriate
Side hugs Handshakes High-fives and hand slapping Holding hands (with young children in escorting situations)	Full-frontal hugs or kisses Showing affection in isolated area Lap sitting Wrestling or piggyback/shoulder rides Tickling Allowing youth to cling to an adult's leg
Appropriate	Inappropriate
Positive reinforcement Child-appropriate jokes (no adult content) Encouragement Praise	Name calling Inappropriate jokes (adult-only content) Discussing sexual encounters or personal issues Secrets Profanity or derogatory remarks Harsh language that may frighten, threaten, or humiliate youth

3.3 Babysitting and Outside Contact

- Staff (including minors), program volunteers, non-programmatic volunteers, and policy volunteers may not have contact with children (under the age of 18) they meet in BGCMS programs outside of the BGCMS. 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 BGCMS 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-BGCMS 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.

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 BGCMS programs. It is expected that children who are participating in BGCMS 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.
- Use of bathrooms located in program spaces will be limited to program participants.
- Staff/volunteers are required to use designated restrooms at all times during program operations. No staff/volunteer should use the same restroom as BGCMS members.
- 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 Locker Room Policy

- Programs must have at least one responsible screened and trained adult (which may include staff, coaches, managers or other volunteers) within eye shot or ear shot at all times and monitoring the locker room during all programming to assure that only participants, approved personnel, and family members are permitted in locker rooms and to supervise the conduct in the locker room.
- While it is not always possible, two locker room monitors are preferable.
- Preferred locker room monitoring includes having locker room monitors inside the locker room while participants are in the locker room; at a minimum, locker room monitors must be in the immediate vicinity outside the locker room (near the door within arm’s length and so that the monitor can sufficiently hear inside the locker room) who also regularly and frequently enters the locker room to monitor activity inside.
- The responsible adult(s) who monitors and supervises the locker room shall have completed Child Protection training and completed a background check.
- If the monitor(s) are inside, then it is strongly recommended that there be two monitors, as having a second monitor may help prevent allegations of impropriety by a monitor alone in the locker room.

- At no time are unrelated applicable adults permitted to be alone with a minor participant in a locker room or changing area when at a facility, except under emergency circumstances.
- Any individual meetings between a minor participant and a coach or other adult in a locker room shall require that a second responsible adult is present.
- Cellphones are not permitted in locker rooms.

4.3 Ratio Expectations

- At minimum, state guidelines for licensed programs will be followed.
 - Those ratios are prescribed by the Massachusetts Department of Early Education and Care which include a 1:13 ratio for all licensed school-age programs and will be adhered to during all program operations in licensed programs.
- At minimum, all licensed except programs will follow approved BGCA ratios.
 - Those ratios are prescribed by Boys & Girls Clubs of America which include a 1:20 ratio for licensed exempt programs and will be adhered to during all program operations in licensed exempt programs.

4.4 Program Audits

- Announced and unannounced audits will be conducted of all programs as prescribed and necessary. Any audit findings will be reviewed with Senior Leadership.
- Nightly building supervisors will complete site audits using IAuditor.

4.5 Social Networking

- Staff (including minors), program volunteers, non-programmatic volunteers, and policy volunteers will not exchange personal email addresses or phone numbers with youth participants. Electronic communication will be approved and transparent; staff (including minors), program volunteers, non-programmatic volunteers, and policy volunteers should not be in communication with BGCMS participants through personal web pages and social networking sites/apps. Instead, official BGCMS technology (computers, web pages, etc.) that are monitored by an administrator will be utilized for necessary and approved communication.
- Staff (including minors), program volunteers, non-programmatic volunteers, and policy volunteers will help create and maintain safe and healthy settings that foster children's social, emotional, cognitive, and physical development and that respect their dignity and their contributions. The use of personal cell phones or other electronic devices is prohibited for

use in capturing any photo or video, unless both written and expressed permission is sought as part of a program release or waiver of liability.

4.6 Transportation

- An employee of the BGCMS may be eligible to drive BGCMS authorized vehicles if they are recommended by the member of the leadership team and meet the minimum eligibility requirements.
- 7D Driver Requirement
 - Any individual transporting children or young people on behalf of the Club must hold a valid 7D School Pupil Transport Certificate and meet all associated legal and safety requirements. No staff member or volunteer is permitted to transport children without current 7D clearance and authorization from the Club. Compliance with this requirement is mandatory and subject to verification to ensure the safety and protection of all children and young people.
- If a member of the leadership team deems an employee unfit to drive, he/she may remove the employee from the approved drivers list and that employee will no longer be able to drive BGCMS vehicles.
- **7D Driver:** A 7D driver is any employee recommended to drive BGCMS vehicles to transport children to and from school and or other BGCMS business. These drivers may also drive BGCMS members to field trips and events. They must abide by standards set forth by the BGCMS Licensed Childcare Transportation Policy, EEC Licensed Program Policies, Child Protection Policy, and Trip & Travel Policy. Employees who are recommended to be 7D drivers must have a 7D driver's license in good standing and meet minimum pre-service and in-service training. All 7D Drivers must hold a valid Commonwealth of Massachusetts 7D license.
- **Provisional 7D Driver:** A provisional 7D drivers is any employee recommended to drive BGCMS vehicles to transport children to and from BGCMS (outside of school transportation). These drivers may drive BGCMS members to field trips and events. They must abide by standards set forth by the BGCMS Child Protection Policy & Trip & Travel Policy. Employees who are recommended to be provisional drivers must obtain 7D license within four months of recommendation. Employees, who do not obtain the 7D license within this amount of time, will not be permitted to drive BGCMS vehicles after four months. All provisional 7D drivers must hold a valid Commonwealth of Massachusetts Class D license.
- **Non-Passenger Driver:** A non-passenger driver is any employee recommended to drive BGCMS vehicles that carry no more than one

passenger and at no times transport children. This status driver is mainly associated with maintenance, nutrition, and administration departments. Employees recommended to be a non-passenger driver must have a Commonwealth of Massachusetts license in good standing and meet minimum driver eligibility requirements. All non-passenger drivers must hold a valid Massachusetts Class D license.

Please see the BGCMS Driver Policy for further requirements and responsibilities.

- Staff will spread themselves out in the vehicle and maintain their focus on the children while transportation is occurring.
- Staff (including minors), program volunteers, non-programmatic volunteers, and policy volunteers may not transport BGCMS participants in their own vehicles.

4.7 Trip & Travel

- 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 BGCMS 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.

4.8 Parental Visits

- BGCMS communicates with families about policies/procedures and our 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 BGCMS Executive Director.

4.9 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.

4.10 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.

- Facilities that the BGCMS owns or uses (schools, parks, etc.) are designed and maintained for optimum prevention of abuse.
- New construction and renovations will create secure areas for children.
- Visitors who enter the building will be required to be screened through our Raptor visitor management system including presenting a photo ID and wearing a visible ID badge. A visitor is someone who has a scheduled appointment, performing work or a service, or visiting for purpose of viewing our programs or services.

4.11 Surveillance Monitoring

- The use of surveillance camera equipment for the purpose of ensuring the safety of persons and property at BGCMS aides our operation in the care and protection of our BGCMS youth.
- Surveillance cameras must be used in a professional, ethical and legal manner.
- Only authorized personnel, as determined by the President & CEO or his or her designee will be permitted to access cameras and the images that they produce.
- The video surveillance systems shall not be installed in, or used to monitor or record, areas where there is a reasonable expectation of privacy in accordance with accepted social norms, such as restrooms, locker rooms, or other private areas.
- Information and images obtained through video surveillance systems shall not be accessed, used, or disclosed except as determined by the President & CEO of his or her designee or law enforcement.
- Conspicuous public signage must be displayed at common surveillance locations.
- Surveillance images obtained will be stored in a secure location and configured to prevent their unauthorized access, modification, duplication, or destruction.
- Surveillance images obtained will normally be kept for no shorter than 7 days unless a specific extension is requested.

4.12 Daily Health Check

- It is encouraged that staff 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)

4.13 Staff ID & Uniforms

- All staff will be identifiable by uniform and/or nametag. Everyone will be able to distinguish staff from other adults.

4.14 Facility Safety & Cleanliness

- All club facilities must be maintained in a clean, safe, and fit-for-purpose condition at all times. Premises must be regularly inspected, hazards promptly addressed, and hygiene standards strictly upheld. Unsafe, damaged, or unsanitary conditions will not be tolerated, and any concerns must be reported and acted upon immediately to ensure the health, safety, and wellbeing of all children, young people, staff, and visitors.

5.0 PARENTAL EDUCATION

5.1 BGCMS Child Protection Policy

- The BGCMS will make available its Child Protection Policy to parents and members. Efforts will be made to distribute summaries and interpret information through bulletins, signage, and paper distribution, BGCMS 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 BGCMS 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 BGCMS 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.

5.4 BGCA Safety Posters

- BGCA Safety Posters are available to all Clubs and should be displayed prominently within club premises. These posters provide clear guidance for children and young people on staying safe and outline how to raise concerns or seek help. Clubs are responsible for ensuring the posters are visible, up to date, and accessible to all members, supporting a safe, informed, and child-centered environment.

6.0 RESPONDING TO AN ALLEGATION

6.1 Reporting Suspicious Behavior to a Supervisor

- All staff (including minors), program volunteers, non-programmatic volunteers, and policy volunteers must receive specific training concerning the requirement to report violations of BGCMS policies immediately to their supervisor.
- BGCMS staff (including minors), program volunteers, non-programmatic volunteers, and policy 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.

Reportable Safeguarding Incidents

Any concern, disclosure, observation, or allegation that a child or young person may be at risk of harm must be reported immediately. This includes, but is not limited to:

- Physical abuse: Unexplained injuries, repeated bruising, marks, or signs of physical harm, or concerns about excessive or inappropriate physical force.
- Emotional abuse: Persistent bullying, intimidation, humiliation, threats, or behavior that harms a child's emotional wellbeing or self-worth.
- Sexual abuse: Any behavior, communication, or contact that is sexual in nature and inappropriate for a child's age, including online interactions.
- Neglect: Failure to meet a child's basic needs, including supervision, hygiene, nutrition, medical care, or a safe environment.
- Grooming or exploitation: Attempts to build inappropriate relationships, isolate a child, offer gifts or special treatment, or encourage secrecy.
- Disclosures: Any direct or indirect statement made by a child or young person that raises concern about abuse or harm.
- Concerning behavior by adults or peers: Any conduct that breaches safeguarding policies or professional boundaries.

All concerns must be reported in line with safeguarding procedures, regardless of certainty, with the child's safety and wellbeing as the priority.

6.2 Mandated Reporter

- All BGCMS staff (including minors), program volunteers, non-programmatic volunteers, and policy volunteers 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 (including minors),

program volunteers, non-programmatic volunteers, and policy volunteers, or other child will be reported immediately. Massachusetts law requires mandated reporters to immediately make a report to the Department of Children and Families (DCF) when they have reasonable cause to believe that a child under the age of 18 years is suffering from abuse and/or neglect by:

- STEP 1: Immediately reporting by oral communication to the local DCF Area Office; and
- STEP 2: Completing and sending this written report to the local DCF Area Office within 48 hours of making the oral report. For more information about requirements for mandated reporters and filing a report of alleged abuse and/or neglect please see A Guide for Mandated Reporters available on the DCF website at www.mass.gov/dcf.

6.3 Suspension of Staff or Program Participant Offender

- Any BGCMS staff (including minors), program volunteers, non-programmatic volunteers, and policy volunteers 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

- BGCMS will perform and investigation following any allegation of child abuse or inappropriate behavior by a staff (including minors), program volunteers, non-programmatic volunteers, and policy volunteers, participant, or member.

6.5 Parent Notification

- In the event that the accusation or suspicion of child abuse involves a parent, a decision will be made jointly by the President & CEO and VP and Chief Program Officer 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 (including minors), program volunteers, non-programmatic volunteers, and policy volunteers, 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, BGCMS will notify its insurance company and the Boys & Girls Clubs of America Crisis Hotline.

6.7 Record Retention

- Following an allegation against a staff (including minors), program volunteers, non-programmatic volunteers, and policy volunteers, their personnel/volunteer 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 and the direction of the President & CEO.

6.8 Boys & Girls Club of America

- Our organization shall immediately report any known allegation of abuse or any potential criminal matter to law enforcement or the appropriate authorities. In addition, we shall report the following known critical incidents to BGCA within 24 hours:
 - Any instance or allegation of child abuse, including physical, emotional or sexual abuse; sexual misconduct or exploitation (BGCMS-related or not) against any child by a current employee or volunteer; or any BGCMS-related instance by a former employee or volunteer.
 - Any instance or allegation of child abuse, including physical, emotional or sexual abuse; or sexual misconduct or exploitation by a youth towards another youth at a BGCMS site or during a BGCMS-sponsored activity.
 - Any child who might have been abducted or reported missing from a BGCMS site or BGCMS-sponsored activity.
 - Any major medical emergency involving a child, staff member or volunteer at a BGCMS site or during a BGCMS-sponsored activity leading to extended hospitalization, permanent injury or death; or a mental health crisis with a child requiring outside care
 - Any instance or allegation of abuse, including physical, emotional or sexual abuse; sexual misconduct; harassment; or exploitation (BGCMS-related or not) alleged against any staff member; or any BGCMS-related instance or allegation of abuse, including physical, emotional or sexual abuse; sexual misconduct; harassment; or BGCMS-related exploitation against a volunteer or visitor.
 - Failure of an inspection by a childcare licensing agency or organization.
 - Any instance or allegation of a felony-level criminal act committed at a BGCMS site or during a BGCMS-sponsored activity.
 - Any misappropriation of organizational funds in the amount of \$10,000 or greater; or any amount of federal funds.
 - Any criminal or civil legal action involving the organization, its employees or volunteers, as well as any changes in the status of an open organization-related legal action.

- Negative media attention that could compromise the reputation of the Member Organization or the BGCMS brand.
- Any other incident deemed critical by the Member Organization.

6.9 Counseling

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

Notwithstanding the above, BGCMS will comply with all laws that apply to the Commonwealth of Massachusetts.

Approved January 1, 2026 by Derek Heim, President & Chief Executive Officer