

CHECKLIST FOR THE POLICY FOR THE PROTECTION OF CHILDREN

Please initial in the spaces below and return to Heather Como at hcomo@holycross.edu.

I. REGISTERING YOUR PROGRAM

1. ____ You have read and understand the “Policy for the Protection of Children.”
2. ____ No later than ninety days prior to the start of the program, you have completed and submitted the [Registration Form for the Policy for the Protection of Children](#).
3. ____ The Program Director has submitted an [Authorized Adult Background Check Registration Form](#), completed a successful criminal background check, and has signed and submitted an [Authorized Adult Agreement](#).

II. PLANNING YOUR PROGRAM

1. ____ You have thought about the specific program you want to host, the types of children you would like to participate and the nature of activities you want to provide. You have considered all potential risks associated with these activities and have taken steps to mitigate and/or otherwise address these risks.
2. ____ You have identified a programmatic budget that incorporates the cost of these risk management measures, including but not limited to the cost of background checks for each Authorized Adult, additional risk management measures (e.g., the hiring of a lifeguard for aquatic events), and other costs required to implement a safe program. If you would like assistance developing this budget, please contact Pat Maher at pmaher@holycross.edu or (508) 793-3492.

III. IDENTIFYING, SCREENING, AND HIRING AUTHORIZED ADULTS AND OTHER INDIVIDUALS WITH ACCESS TO CHILDREN

1. ____ You have identified the number of Authorized Adults you need, based on the number and age of the children participating, using the [Ratio Chart](#).
2. ____ You have confirmed that all Authorized Adults have completed the Background Check Process:
 - a. All Authorized Adults have completed the [Authorized Adult Background Check / Registration Form](#).
 - b. The Authorized Adult has authorized Human Resources to complete a background check **and** you have been informed by Human Resources that they have successfully completed their background check.
3. ____ Prior to working with Children or in the Program, each Authorized Adult has signed and submitted an [Authorized Adult Agreement](#).

IV. DEVELOPING PROGRAM MATERIALS FOR PARENTS AND PARTICIPANTS

1. ____ You have created and disseminated registration and program materials for parents and Children that include:
 - a. Information that generally explains the nature of your program, the activities that will take place, and the (physical, academic, emotional, etc.) requirements of the children.
 - b. A registration form that includes: (a) the Child's name, birth date, age, parent(s) or guardian(s)' names and contact information, (b) a question seeking information on parent or guardian's marital status and custody, (c) the names and phone numbers of two additional emergency contacts who could arrive to the Program within thirty (30) minutes, (d) the list of individuals permitted to transport the Child home from Program; and (e) signed waiver/assumption of risk from all Children and parents/guardians prior to allowing any participation in the Program.
 - c. The [Standard Assumption of Risk](#), which has been adapted for your program and have sent it to those applying to take part in your program.
 - d. The standard [Medical Treatment Authorization Form](#), which has been adapted for your program and have sent it to those applying to take part in your program.

2. ____ You have created and disseminated a Code of Conduct for parents and Children that includes:
 - a. A list of permitted and prohibited conduct.
 - b. A statement that participants are subject to discipline, up to and including removal from, or suspension of participation in, the Program, without refund, for any violation of the Code of Conduct or any other College or Program rule.
 - c. A statement that Children may not transport other Children. (Note: This does not address whether Children are permitted to transport Children to or from home and camps, which is a parental/guardian decision.)
 - d. Rules and procedures governing when and under what circumstances Children may leave College property during the program.
 - e. The additional requirements, if the Program is a residential program:
 - i. An age-appropriate curfew time for Children;
 - ii. A statement that children will be separated by floor based on gender.
 - iii. Guests of participants (other than a parent/legal guardian and other program participants) are restricted to visitation in the building lobby and/or floor lounges, only during approved hours specified by the Program, and only with prior written permission of the parent/guardian.
 - iv. A statement that Children may not enter another Child's bedroom without prior invitation of the Child.

- v. A communications to parents or legal guardians of Children to report any suspected violations of the College's child safety practices and policies.
3. _____ You have created and communicated designated drop-off and pick-up locations for the participants.

V. DEVELOPING INTERNAL OPERATING PROCEDURES AND OTHER DOCUMENTS

1. _____ You have implemented policies and procedures that inform Authorized Adults about their mandatory reporting obligations, including:
 - a. **Actual or suspected incidents of Child Abuse or Neglect to the Department of Public Safety, as further defined in Massachusetts state law M.G.L. c. 119, §51A and Section V. of the [Policy for the Protection of Children](#).**
 - b. Injuries or Fatalities to a Child to the Department of Risk Management, using the College's [Injury Report Form](#).
2. _____ You have consulted with the Chief Risk Officer regarding any high-risk activities, including but not limited to, horseback riding, hiking, scuba diving, rock climbing, firearms, archery, watercraft, canoeing and aquatic events.
3. _____ You have created a general process by which you will review and address violations of the participants' Code of Conduct.
4. _____ You have created a *Code of Conduct for Authorized Adults* that prohibits the specific behaviors identified in the Policy and Procedure and [Authorized Adult Agreement](#).
 - a. A procedure to take attendance throughout the day and report missing Children.
 - b. A procedure whereby the Program Director will make periodic unannounced visits to ensure behavioral standard are being followed.
 - c. A process by which the Program Director will document specific observations about how those under their supervision interact with Children and provide prompt feedback to employees, volunteers, or contractors regarding their adherence to child safety practices and policies.
 - d. A statement that Authorized Adults must make all reasonable efforts to ensure the safety of Children participating in programs and activities covered by this Policy and have an ongoing obligation to remove all Children from potentially suspicious or dangerous situations. If a situation is felt to present immediate danger to a Child, Public Safety should be called as soon as possible.
 - e. A requirement that if a Child discloses and/or an Authorized Adult has reason to suspect that the Child has been subject to any other type of inappropriate conduct during a program, they must inform the Program Director immediately, unless the Authorized Adult believes that the Program Director (Department Manager/Director for non-Program activities) may be involved in the allegations of assault or abuse, in which case they should contact Public Safety immediately.

- f. A disciplinary procedure for Authorized Adults, which includes the requirement that if an allegation of inappropriate conduct has been made against an Authorized Adult participating in a program, the Program Director will (1) remove the Authorized Adult from any further participation in programs and activities covered by this Policy until such allegation has been satisfactorily resolved; and (2) contact the Director of Public Safety and Risk Management. **If the issue deals with any “child abuse and neglect” is to be interpreted broadly to include, but not be limited to, any physical, mental, emotional or sexual abuse or neglect, the reporter must follow Section V. “Mandatory Reporting Requirements”, of the Policy.**
 - g. A contingency plan as to how to cover the gap in the event an Authorized Adult is unable to participate or is asked to leave.
5. ____ You have created a process by which the Program Director, or designee, will obtain and authenticate parental/guardian permission to leave the Program early.
6. ____ If the activity takes place in a Science laboratory or involves theatre design and production, you have met the following Safety Requirements:
 - a. The [Assumption of Risk](#) includes the specific risks associated with the Program, including, but not limited to, injuries associated with the specific equipment to be used and specific hazards to which participants may be exposed.
 - b. Contacted the Director of Laboratory and Studio Safety to arrange for safety training for all participating Children, to take place prior to their entering the environment.
 - c. Information and training for Children regarding the required Personal Protective Equipment (“PPE”).
 - d. The requirement that the Authorized Adults maintain direct supervision at all times of Children taking part in Programs in these environments.
7. ____ You have created *emergency operations procedures* that includes:
 - a. A statement that all Authorized Adults remain responsible for the care of Children in their Program during an emergency.
 - b. The requirement that all Authorized Adults must be familiar with the College’s Emergency Management Plan.
 - c. Additional, specific emergency procedures tailored to the unique risks presented by the Program, if any (e.g., heat stroke for athletic Programs held during the summer).
 - d. The requirement that Program Directors notify the Child’s parent/legal guardian in case of an emergency, including medical or behavioral problem, natural disasters, or other significant program disruptions.
4. ____ You have created *a communications policy* that clarifies that The Vice President for Communication is responsible for the coordination of any media inquiries regarding this policy and any Programs with Children. Anyone who receives a request for

information regarding a Program with Children must contact the Vice President for Communications, who will consult, guide and coordinate the appropriate response.

5. _____ If you have a residential programs, you have reviewed and created a system for implementing and enforcing those provisions of the policy that deal with residential programs.

VI. TRAINING OF AUTHORIZED ADULTS

1. _____ You have arranged for and/or conducted training for the Authorized Adults, which includes information on the following areas:
 - a. Program-Specific Information, which includes:
 - i. Information about the Program;
 - ii. Information on the age and interests of the Children;
 - iii. Authorized Adults' Code of Conduct, as defined in Section V.I, above.
 - iv. Information on the Program's other *Internal Operating Procedures*, outlined in Section V, above.
 - v. Specific information regarding any participants that may impact their participation in the program (including but not necessarily limited to medical information).
 - b. Training Specific to Working with Children, including: ¹
 - i. Training on the nature of child abuse; signs and symptoms of child abuse; laws, policies and procedures to report child abuse allegations; and strategies for protecting children from potential abuse. (All Authorized Adults who are paid must be informed that they are mandatory reporters under Massachusetts General Laws, chapter 119, section 51A.)
 - ii. Information on the Mandatory Reporting Requirements, found in Section V. of the [Policy for the Protection of Children](#).
 - iii. Title IX training on prohibited discrimination, harassment and retaliation.
 - iv. Campus Security Authority training.

VII. PRIOR TO PROGRAM START

1. _____ You have confirmed that each participant has submitted a signed and completed:
 - a. Registration form
 - b. Assumption of Risk (which contains the photo release)
 - c. Medical Treatment Consent Form

¹ This training will be provided by the College. Please contact Heather Como at (508) 793-2394 to find out the training schedule.

2. ____ You have reviewed the Medical Treatment Consent Forms and, if you have any questions regarding the participants' health histories, you have consulted with the Chief Risk Officer or the Director of Student Health Services, or designee.
3. ____ You have confirmed that every All Authorized Adults who will transport Children for any reason at any time become "Certified Drivers" through the College's Transportation Program.
4. ____ You have conducted a safety inspection, including:
 - a. Inspecting all facilities, buildings, equipment, tools and other items that will be used during the Program and/or by children participating.
 - b. Identifying any damages, risks, nuisances or any other conditions that might present a risk to your participants, Authorized Adults or others on premises. This includes, but is not limited to tripping hazards, construction work, overgrown shrubbery, inadequate security, unsafe conditions, damaged equipment and defective equipment.
 - c. [Contacting Facilities](#) for assistance in eliminating such risks and/or contacting local building inspectors, as necessary and appropriate, to inspect any temporary structures, such as tents, etc.,
 - d. Maintaining all documentation related to such work.
5. ____ You have provided a list of all children participating in the program and a directory of Program staff to the Department of Public Safety and, as applicable, Residential Life. This list shall include participant's name; local room assignment (if applicable); gender, age, address, and phone number(s) of parent or legal guardian, as well as emergency contact information.
6. ____ You have contacted Risk Management with any questions regarding your Program or working with Children.

FORMS AND DOCUMENTATION

- [Policy and Procedure](#) (same link to policy)
- [Registration Form for Program Involving Minors](#) (fillable PDF)
- [Ratio Chart](#) (PDF)
- [Authorized Adult Background Check / Registration Form](#) (Word or fillable PDF)
- [Authorized Adult Agreement](#)(fillable PDF)
- [Standard Assumption of Risk](#)(fillable PDF)
- [Medical Treatment Authorization Form](#) (Word or fillable PDF)
- [Injury Report Form](#)(fillable PDF)

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