

### General Purpose Statement

The Community Creative Center (“CCC”) seeks to provide a safe and secure environment for the children who participate in our programs, classes, and activities. By implementing the below practices, our goal is to protect the children from incidents of misconduct or inappropriate behavior.

### Definitions

For purposes of this policy, the terms “child” or “children” include all persons under the age of eighteen (18) years. The term “CCC staff,” includes both paid and unpaid persons who work with or around children. The term “employee” refers to paid persons who work for the CCC. The term “Volunteer” refers to unpaid persons who are assisting with programs, classes, and activities.

## I. Screening

### A. Hiring Employees

1. All persons who work with the children participating in CCC programs, classes, and activities will be screened. This screening includes the following:

- b) Written Application**

All persons seeking to work with children must complete and an online application supplied by the CCC for the purpose of screening. If the online application is approved, the CCC will require the applicant to complete a written application that will request basic information from the applicant and will inquire into previous experience with children, previous CCC affiliation, reference and employment information, as well as disclosure of any previous criminal convictions. The application form will be maintained in confidence on file at the CCC

- c) Personal Interview**

Upon completion of the application, a face-to-face interview may be scheduled with the applicant to discuss his/her suitability for the position.

- d) Reference Checks**

Before an applicant is permitted to work with children, at least two of the applicants’ references will be checked. These references should be of an institutional nature as opposed to personal or family references, preferably from organizations where the applicant has worked with children in the past. Documentation of the reference checks will be maintained in confidence on file at the CCC.

- e) Criminal Background Check**

A national criminal background check is required for all employees (regardless of position) and volunteers.

- f) Experience Requirement**

Teaching artists are required to have six (6) months of prior, verifiable teaching experience, and assist with classes at the CCC for a minimum of 5 classes. At the

discretion of the Education Program Manager, the CCC will permit applicants with no prior teaching experience to assist teaching artists for 10 classes before that applicant is permitted to teach a class at the discretion of the EPM.

2. Before a background check is performed, prospective workers will be asked to sign an authorization form allowing the CCC to run the check. If an individual declines to sign the authorization form, s/he will be unable to work or volunteer at the CCC.

#### B. Disqualifying Offenses:

1. A disqualifying offense that will prevent an individual from working or volunteering with the CCC will be determined by the Education Program Manager on a case-by-case basis in light of all the surrounding circumstances. Convictions for an offense involving children and/or for offenses involving violence, indecency, dishonesty, illicit substances, any other conduct contrary to our mission will preclude someone from being permitted to work at the CCC. Failure to disclose a criminal conviction on the application form will also be a disqualifying event.
2. The background check authorization form and results will be maintained in confidence on file at the CCC and subject to state and federal privacy law requirements.

#### C. Volunteers

We recognize that there may be times when it is necessary or desirable for volunteers to assist in the instruction of children during programs, classes, or activities. The following guidelines apply to volunteers:

1. Must be at least age 18.
2. Must be screened as specified above for employees.
3. Must be under the supervision of CCC staff.
4. Must be trained on the CCC Child Protection Policy.
5. Must never be left alone with children.

#### D. Training & Education

The CCC will provide training on this child protection policy to all existing and new CCC Staff, whether employees or volunteers, and will provide annual training classes for CCC staff. The Education Program Manager and the Personnel Committee will establish training protocols for initial training and establish updates. A record of completed training will be maintained in each employee's personnel file. Training protocols should adhere to the following principles:

1. The induction process for all representatives shall include child protection policy principles and procedures, and provide learning about recognizing and responding to child abuse

2. The CCC's organizational atmosphere should encourage opportunities to question and learn about child protection issues
3. Training on behavior guidelines must be available for those with direct contact with children
4. Orientation should be provided to children themselves, as well as their parents/legal guardians on all relevant aspects of the CCC's Child Protection Policies and Procedures.
5. CCC Staff will receive child protection training (within 30 days of hire, and prior to working with children).
6. Existing representatives will receive child protection training as soon as possible after implementation of new or updated policies (within 30 days at the latest).
7. Part-timers and volunteers will be trained before they work with children.
8. Training and training-updates will occur at the beginning of each session (Winter, Spring, Summer, Fall).
9. Training availability should be flexible and may be provided online.
10. The Education Program Manager, Executive Director and the Personnel Committee are responsible for oversight and to ensure implementation.

## II. Child Protection Policies

### 1. Classroom Behavior Policy

- a. To maintain a safe environment when students are using art materials, teachers will:
  - i. Store surplus materials away from children
  - ii. Monitor distribution of supplies to minimize spills and mishaps
  - iii. Supervise children closely to prevent unintended uses of art materials
  - iv. Mix powdered and/or dusty materials for students
  - v. Use recommended protective gear (goggles, gloves, mask), depending on the product used in the specific program
  - vi. Interact safely with any potentially-dangerous materials, including washing hands (avoiding using solvents to clean the skin), watching for unusual reactions to chemicals, and covering cuts and sores with bandages before using materials.
- b. Teachers will not engage in any behavior that endangers or appears to endanger a student. This includes being alone with a student, transporting the student in a private vehicle, or administering any form of physical discipline.
- c. Teachers will be conscientious to remain above reproach in their interactions with students, particularly in regard to appropriate physical contact

### 2. Open Door Policy

Classroom doors should remain open. Doors should never be locked while persons are inside the room.

### 3. Two Adult Policy

It is our goal that a minimum of two unrelated adult staff/volunteers will be in attendance at all times when children are being supervised during our programs, classes, and activities. Some youth classes may have only one adult teacher in attendance during the class session; in these instances, interior doors to the classroom should remain open and there should be no fewer than three students with the adult teacher. We do not allow minors to be alone with one adult on our premises or in any sponsored activity. Staff and Volunteers should at all times avoid separating children from other classmates in the Kiln Room, Glaze Room, unoccupied classrooms, and storage closets.

### 4. Private Automobile Policy

No CCC Staff, Employee, or Volunteer should ever take a child in their private vehicle without the express, written consent of a parent or legal guardian. In cases of medical emergencies, staff will call an ambulance.

### 5. Sick Child Policy

a. It is our desire to provide a healthy and safe environment for all of the children at the CCC. Parents are encouraged to be considerate of other children when deciding whether to place a child under our care. In general, children with the following symptoms should NOT be dropped off:

- 1) Fever, diarrhea, or vomiting within the last 48 hours;
- 2) Green or yellow runny nose;
- 3) Eye or skin infections; and/or
- 4) Other symptoms of communicable or infectious disease.

b. If CCC Staff observe children who are ill, these children will be separated from other children and the parent or guardian will be contacted to request that the child be picked up for the day.

### 6. Medications Policy

a. It is the policy of the CCC not to administer either prescription or non-prescription medications to the children in our programs, classes, or activities. Medications should be administered by a parent at home. Parents are reminded of our sick child policy.

b. Exceptions to the medications policy may be granted to parents of children with potentially life-threatening conditions (such as asthma, diabetes, or severe allergic reactions). Parents of such children should address their situation with the CCC Executive Director to develop a plan of action.

#### 7. Corporal Punishment Policy

It is the policy of the CCC not to administer corporal punishment, ever, even if parents have suggested or given permission for it. There shall be no spanking, grabbing, hitting, or other physical discipline of children. CCC Staff should consult with the Executive Director if assistance is needed with disciplinary issues and follow the CCC Disciplinary Reporting Policy.

#### 8. Restroom Guidelines

- a. Children under five years of age are typically supervised by their parents/guardians. Children five years of age and younger who are not supervised by a parent or legal guardian should be escorted as a group to the hallway bathroom. They should always go in a group; no CCC Staff should ever take a child to the bathroom alone. CCC Staff should check the bathroom first to make sure that it is empty, and then allow the children inside. The CCC Staff should then remain outside the bathroom door and escort the children back to the classroom. If a child is taking longer than seems necessary, the CCC Staff should open the bathroom door and call the child's name. If a child requires assistance, the CCC Staff should prop open the bathroom door, and leave the stall door open as they assist the child.
- b. For children over the age of five but under the age of 10, at least one adult should escort children to the bathroom. The worker should check the bathroom first to make sure that the bathroom is empty, and then allow the children inside. The adult should then remain outside the bathroom door and escort the children back to the classroom.
- c. For the protection of all, CCC Staff should *never* be alone with a child in a bathroom with the door closed and under no circumstances shall CCC staff ever be in a closed bathroom stall with a child. Parents are strongly encouraged to have their children visit the bathroom prior to arriving at the CCC.

#### 9. Accidental Injuries to Children

In the event that a child or youth is injured while under our care, the following steps should be followed:

- a. For minor injuries, scrapes, and bruises, CCC Staff will provide First Aid (Band-Aids, etc.) as appropriate and will notify the child's parent or guardian of the injury at the time the child is picked up from our care.
- b. For injuries requiring medical treatment beyond simple First Aid, the parent and/or guardian will immediately be summoned in addition to the Executive Director. If warranted by circumstances, an ambulance will be called.
- c. Once the child has received appropriate medical attention, an incident report will be completed in the case of injuries requiring treatment by a medical professional.

### III. Responding to Allegations of Abuse or Harassment

For all reported child-abuse incidents, the CCC requires that the child's best interest be the first priority. In addition, all incidents must be dealt with promptly, and they must be handled in a confidential manner that does not harm the victim or the person reporting the abuse.

#### 1. Definitions

For purposes of this policy, the terms "abuse" and "harassment" are any actions (or lack of actions) that endanger or harm a child's physical, psychological or emotional health and development. Child abuse and/or harassment occurs in different ways and includes the following:

- a. **Physical abuse** – any physical injury to a child that is not accidental, such as beating, shaking, burns, biting, scratching or similar physical contact.
- b. **Emotional abuse** – emotional injury when the child is not nurtured or provided with love and security, such as an environment of constant criticism, belittling and persistent teasing.
- c. **Sexual abuse** – any sexual activity between a child and an adult or between a child and another child, including activities such as fondling, exhibitionism, intercourse, incest, and pornography.
- d. **Sexual harassment** - unwelcome sexual advances, requests for sexual favors, sexually motivated physical contact, or other verbal or physical contact or communication of a sexual nature between a child and an adult or between a child and another child.

Sexual harassment may include, but is not limited to, the following:

- Leering at someone else's body
  - Making comments, gestures, or jokes of a sexual nature
  - Sexual advances/propositions/suggestions
  - Sexual "dirty" jokes
  - Touching, grabbing, and/or pinching
  - Spreading rumors about another's sexual activity
  - Talking about one's own sexual activities in front of others
  - Showing offensive/sexual pictures, stories, objects
- e. **Neglect** – depriving a child of his or her essential needs, such as adequate food, water, shelter, and medical care.

## 2. Reporting Abuse or Harassment

- a. When CCC Staff become aware of abuse, harassment, or neglect of the children who participate in CCC programs, classes, and activities, they are required to report it immediately to the Reporting Authority for further action, and that may include reporting the incident to authorities as may be mandated by Arkansas law.
- b. The Designated Reporting Authorities (“DRA”): The Executive Director and the Educational Program Manager are the DRA for the purposes of this policy. If the Executive Director and the Educational Program Manager are involved parties, the Chair of the Board of Directors becomes the DRA.
- c. In the event that an incident of abuse or neglect is alleged to have occurred at the CCC or during a sponsored program, class, or activity, the following procedure shall be followed:
  - 1) **Mandatory Reporting:** Reports, verbal or written, should be made to the DRA. If act has occurred that is clearly criminal, the DRA will immediately contact Law Enforcement Authorities
  - 2) **Acknowledge:** Within 24 hours of receiving a complaint, DRA will acknowledge the receipt of the complaint with a written response to complainant’s parent or legal guardian.
  - 3) **Report Preparation:** The DRA will prepare a written summary of the complaint, if verbally reported, and secure the signature of the complaining witness, parent or guardian within 48 hours. A copy of the report will be forwarded the personnel committee, which will oversee the investigation.
  - 4) **Review and Forward:** The DRA will undertake an initial review of the complaint and determine what, if any, additional information or documentation may be required to complete an investigation. The DRA may need to contact the complainant (his or her parents or legal guardians) to clarify the details or request additional information where necessary. Complaints involving serious allegations shall be immediately forwarded to all members of the Personnel Committee.
  - 5) **Investigate:** Within 10 business days of receiving the complaint the DRA will investigation the complaint objectively and impartially by considering the information provided, the action[s] of the complainant (parents or legal guardians) in relation to his/her dealings with the CCC, and any other information that may be available that could assist the CCC in investigating the complaint. All findings will be reported to the Personnel Committee.
  - 6) **Respond:** Within 12 business days from the receipt of the complaint, the Personnel Committee (or the DRA at the direction of the Personnel Committee) will notify the Complainant (parent or legal guardian) of the CCC’s findings and any actions the CCC has taken in regards to the complaint. If further investigation is necessary, or if an independent investigation is warranted, the Personnel Committee will provide written notice to the parent/legal guardian of such and provide the identity of that third party. The timeliness of Independent investigations are beyond the control of the CCC,

but the Personnel Committee, the DRA, and CCC Staff will make reasonable efforts to cooperate in a timely manner with the investigation and provide written updates every 30 days to the parent/legal guardian until the investigation is completed.

- 7) **Action:** Where appropriate the CCC will amend its practices and/or policies as necessary to protect the entire CCC community. All ongoing complaints and investigations will be presented to the Board of Directors during the next scheduled board meeting. The final disposition of any complaints will be reviewed by the Board of Directors, consistent with the policies stated herein.
- 8) **Record:** The Personnel Committee will keep a record of complaints for continuous improvement, and will monitor progress through regular review.

### 3. Parental Reporting

One cannot assume that the CCC will automatically know when conduct in violation of this policy is occurring or has occurred. Individuals with knowledge of inappropriate conduct have the responsibility to bring that to the attention of the DRA within 48 hours of the occurrence, or their discovery of that occurrence.

### 4. Zero Tolerance and Informing the Personnel Committee

All acts identified or reported as violations of this policy will be fully and impartially investigated. The DRA is required to inform the Personnel Committee and Executive Committee of the Board of Directors of alleged violations within 48 hours from receiving the complaint. In no instance will substantiated policy violations go unaddressed. Where appropriate, employee dismissal, volunteer removal, or contract termination actions will occur. Any acts rising to the level of criminal conduct will be referred to local law enforcement authorities or Child Protective Services as required by law.

### 5. Sanctions

- a. Employees or volunteers found to have engaged in non-sexual harassment or intimidation or sexual harassment shall be disciplined. Such discipline may include employee probation, suspension, or dismissal, volunteer removal, or contract termination. A written record of any proven violation will be placed in the offender's personnel file. In cases where a criminal investigation is pending, the Executive Director or Chair of the Board of Directors has full authority to suspend an employee or volunteer.
- b. If a student or parent engages in behavior in violation of this policy on CCC premises or at any CCC-sponsored event, that person may be subject to suspension or exclusion from CCC property or activities and will forfeit all fees and tuition paid.

6. Retaliation

Retaliatory or intimidating conduct directed against anyone who files a harassment complaint or against anyone who has assisted in an investigation is prohibited and shall be considered a policy violation as serious as the harassment itself.

7. Confidentiality

Confidentiality will be maintained throughout the investigation to the extent practicable and appropriate under the circumstances to protect the privacy of persons involved. This means that the people investigating the complaint will discuss it or the underlying behavior only with persons who are involved in the case **on a need to know basis**. This policy shall be weighed at all times with the safety of the CCC Community taking top priority.