

CURRY COLLEGE

Policy on the Protection and Safety of Minors

I. POLICY STATEMENT

Curry College (“College”) is committed to the safety of all individuals in its community. The College has particular concern for those who are potentially vulnerable, including minor children, who require special attention and protection. This Policy and the accompanying Procedures for the Protection of Minors (“Protection”) establishes requirements for those in the College community who may work or interact with individuals under 18 years of age (“Minors”), with the goal of promoting the safety and wellbeing of Minors.

II. SCOPE

This Policy provides guidelines that apply broadly to interactions between Minors and College students, faculty, staff, interns, and volunteers in College Programs and Service Programs. This Policy also establishes requirements for Non-College Programs involving Minors on campus, and College agreements with such organizations and entities shall reflect these requirements. All College students, faculty, staff, interns, and community members are responsible for understanding and complying with this Policy.

III. DEFINITIONS

Authorized Adult means an individual, age 18 and older, paid or unpaid, who supervises, chaperones, or otherwise works with Minors in College Programs, Service Programs, or Non-College Programs. Authorized Adults include but are not limited to

- College students, faculty, staff, interns, volunteers, temporary employees, independent contractors/consultants; and
- Non-College staff, interns, volunteers, temporary employees, independent contractors/consultants.

The role of Authorized Adult may include positions such as counselors, chaperones, coaches, instructors, and other similarly situated people.

College Programs means any program or activity that the College operates or sponsors or in which College students, faculty, staff, or volunteers engage through their College roles. Examples of College Programs include:

- Residential and Non-Residential programs operated by the College on campus;
- Off-Campus programs operated or formally facilitated by the College; and

- Programs which the College does not operate, sponsor, or formally facilitate but in which College students, faculty, or staff participate in their capacity as students, faculty, or staff.

This term does not include programs or activities in which one may engage that are unrelated to one's status as College student, faculty, staff, or volunteer.

Mandated Reporters for the purposes of this Policy includes all employees including faculty and student employees. Mandated Reporters are defined at M.G.L. c.119 51A and include, but are not limited to, the following professions: any physicians; medical interns; hospital personnel engaged in the examination, care or treatment of persons; medical examiners; psychiatrists, psychologists and clinical social workers, drug and alcoholism counselors; emergency medical technicians; dentists; nurses; chiropractors; podiatrists; optometrists; osteopaths; public or private school teachers; educational administrators; school or family counselors; day care worker or any person paid to care for or work with a Child in any public or private facility, or home or program funded by the state, which provides day care or residential services to Children or which provides the service of child care resource and referral agencies, voucher management agencies, family day care systems and child care food programs; probation officers; clerks/magistrate of the district court; parole officers; firefighters; police officers; office for Children liscensor, school attendance officers, human services professionals.

Minor for purposes of this policy means any person under the age of 18. College undergraduate students who are under the age of 18 are treated by this Policy similarly to all other students for purposes of their interactions with Minors in College Programs, Non-College Programs, and Service Programs and are subject to the requirements that apply to other students.

Minors Program Coordinator means the individual within each College school, department, or administrative unit sponsoring, operating, or participating in a College Program or Service Program who is primarily responsible for coordinating that school, department, or administrative unit's obligations under this Policy.

Non-College Program means any program or activity that is offered by a third-party organization, group, or entity through a contract or other written agreement with the College that potentially will include Minors as participants and will occur on College property or use College facilities. Examples of Non-College Programs include:

- Youth Programs hosted by outside organizations on campus:
 - A summer sports camp run by a private athletics company using College fields
 - A day camp operated by an external education nonprofit
 - A music or theater camp run by a community arts organization
 - A coding bootcamp hosted by a private tech-education vendor
- School-Sponsored Visits to campus:
 - Field trips to science labs
 - College access programs run by high schools or guidance departments
 - Band or choir festivals hosted in campus performance spaces

- Rental or Use of Campus Facilities by any outside group renting space:
 - A summer day camp
 - A youth group renting dorms or meeting rooms
 - Girl Scouts or Boy Scouts using campus facilities
 - A youth sports league renting the gym or pool
- Programs Using Campus Housing:
 - Summer enrichment programs run by private companies
 - Leadership camps hosted by national youth organizations

Owner/Operators means any College student, faculty, staff, that operates or sponsors a College Program or Service Program that will potentially include Minors as participants; or any Non-College Program that operates or sponsors a Non-College Program that will potentially include Minors as participants.

Service Program means any services, programs or activities not operated by the College but in which members of the College community participate in their capacity as students, faculty, or staff. Examples of Service Programs are volunteer activities of students, student club activities, activities to support student research projects.

IV. PROHIBITED CONDUCT

No Curry- or Non-Curry Program including Minors shall involve any of the following:

- Unobserved or unsupervised one-on-one contact between a Minor and any Authorized Adult;
- Corporal punishment, inappropriate touching, horseplay;
- Hazing or bullying of any kind;
- Presence or consumption of tobacco, alcohol, or illegal drugs;
- Presence or use of or sexually explicit literature or other media of any kind;
- Presence or use of firearms or weapons of any kind;
- Gifts between Authorized Adults and Minors exceeding a price of more than \$25.00;
- Inappropriate use of cameras, audio or video equipment, or computers;
- Any private communication not pertaining to Program matters between adults and Minors by email, text messaging or social media; or
- Transportation of Minors by adults.

V. PROGRAM REQUIREMENTS

A. College Programs

Each Owner/Operator of a College Program is responsible for ensuring that Authorized Adults who participate in College Programs comply with all applicable aspects of this Policy and accompanying Procedures.

Reporting	<ul style="list-style-type: none">• Immediately reporting instances of known or suspected abuse or neglect of a Minor to appropriate College and Massachusetts officials in accordance with this Policy and accompanying Procedures
Criminal and Sex Offender Background Checks	<ul style="list-style-type: none">• Ensuring that a cleared criminal and sex offender background check status has been received prior to permitting any member of the College community to participate in College Programs
Training	<ul style="list-style-type: none">• Ensuring that members of the College community who participate in College Programs receive training (Review of the Policy and/or Training)• Complete Policy Acknowledgement and Agreement (attached hereto) and Training Certification (Appendix A of the Procedures)
Waivers	<ul style="list-style-type: none">• Obtaining waivers of liability from parents/guardians of all Minor participants that specifically release the College, unless exemption obtained from the Associate Vice President of Finance (Appendix B of the Procedures)
Minors Program Coordinator	<ul style="list-style-type: none">• Provide the name and contact information for the Minors Program Coordinator to the Office of Human Resources prior to commencing any College Program
Information/Documentation	<ul style="list-style-type: none">• Submitting information as requested by the College on programs• Complete Self-Disclosure Form for Authorized Adults (Appendix B)• Maintaining documentation of compliance with the requirements of this Policy and Procedures and any applicable Federal or State Laws
Compliance with Federal and State Laws	<ul style="list-style-type: none">• Complying with any federal or state requirements applicable to services, programs and activities involving Minors, including, but not limited to, the Massachusetts Minimum Standards for Recreational Camps for Children, 105 CMR 430.00, the Massachusetts Mandated Reporter

	law, M.G.L. c. 119, § 51A, and the Massachusetts Department of Early Education and Care regulations
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B. Service Program

Each Owner/Operator of a Service Program is responsible for ensuring that Authorized Adults who participate in Service Programs comply with all applicable aspects of this Policy and accompanying Procedures.

Reporting	<ul style="list-style-type: none"> Immediately reporting instances of known or suspected abuse or neglect of a Minor to appropriate College and Massachusetts officials in accordance with this Policy and accompanying Procedures
Criminal and Sex Offender Background Checks	<ul style="list-style-type: none"> Ensuring that a cleared criminal and sex offender background check status has been received prior to permitting any member of the College community to participate in Service Programs
Training	<ul style="list-style-type: none"> Ensuring that members of the College community who participate in Service Programs receive training (Review of the Policy and/or Training) Complete Policy Acknowledgement and Agreement (attached hereto) and Training Certification (Appendix A of the Procedures)
Minors Program Coordinator	<ul style="list-style-type: none"> Provide the name and contact information for the Minors Program Coordinator to the Office of Human Resources prior to commencing any Service Program
Information/Documentation	<ul style="list-style-type: none"> Submitting information as requested by the College on programs Complete Self-Disclosure Form for Authorized Adults (Appendix B) Maintaining documentation of compliance with the requirements of this Policy and Procedures and any applicable Federal or State Laws
Compliance with Federal and State Laws	<ul style="list-style-type: none"> Complying with any federal or state requirements applicable to services, programs and activities involving Minors, including, but not limited to, the Massachusetts Minimum Standards for Recreational Camps for Children, 105 CMR 430.00, the Massachusetts Mandated Reporter law, M.G.L. c. 119, § 51A, and the Massachusetts Department of Early Education and Care regulations

C. Non-College Programs

Owners/Operators of Non-College Programs are responsible for ensuring that their employees, agents, and volunteers comply with all applicable aspects of this Policy and accompanying Procedures.

Reporting	<ul style="list-style-type: none">Immediately reporting instances of known or suspected abuse or neglect of a Minor to appropriate College and Massachusetts officials in accordance with this Policy and accompanying Procedures
Criminal and Sex Offender Background Checks	<ul style="list-style-type: none">Ensuring cleared criminal and sex offender background check status has been received prior to permitting any employee, agent or volunteer to participate in a program that includes Minors
Training	<ul style="list-style-type: none">Ensuring that members of the College community who participate in Non-College Programs receive training (Review of the Policy)Complete Policy Acknowledgement and Agreement (attached hereto)
Contract With College / Required Elements	<ul style="list-style-type: none">Entering into a contract with the College prior to operating a Non-College ProgramObtaining waivers of liability from parents/guardians of all Minor participants that specifically release the College, unless exemption obtained from the Associate Vice President of Finance Carrying appropriate insurance that meets requirements designated by the Associate Vice President of FinanceMaintaining documentation of compliance with requirements of this Policy and accompanying Procedures and applicable Federal and State Laws
Compliance With Federal and State Laws	<ul style="list-style-type: none">Complying with additional federal or state requirements applicable to services, programs, and activities involving Minors, including, but not limited to, the Massachusetts Minimum Standards for Recreational Camps for Children, 105 CMR 430.00, and the Massachusetts Mandated Reporter law, M.G.L. c. 119, § 51A.

D. Other Interactions with Minors

College faculty, staff, students, and volunteers on Campus are exempt from training and background check requirements only in circumstances described below.

College Classes and Typical Academic Settings (including College Students Under Age of 18)	<ul style="list-style-type: none">• No training or background checks required by College• Required to immediately report instances of known or suspected abuse or neglect of a Minor to appropriate College or the Department of Children and Families in accordance with this Policy and accompanying Procedures
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E. Training Program

All Authorized Adults who participate in College Programs and Service must complete a training program prior to being permitted to participate. The elements of such training must include:

- College Recommended Guidelines for Interacting with Minors;
- Warning signs for child abuse or neglect; and
- A review of the process for reporting potential harm to Minors, including obligations of mandated reporters.

F. Background Checks

The College's general requirements for conducting background checks are described below. Specific College requirements and procedures for conducting background checks are set forth in the accompanying Procedures.

1. College Programs and Service Programs

Each Owner/Operator of a College Program or Service Program is responsible for ensuring compliance with the College's requirements concerning criminal and sexual offender background checks, as set forth in the Procedures. No Authorized Adult who is required to undergo a background check should participate in a College Program or Service Program until a cleared status has been received by the operator of the College Program or Service Program.

2. Non-College Programs

Owners/Operators of Non-College Programs involving Minors must conduct criminal and sexual offender background checks of their Owners/Operators, employees, volunteers, and agents in compliance with College standards, as set forth in this Policy and the Procedures.

No Owners/Operators, employee, volunteer, or agent of a Non-College Program who is required by this Policy or the Procedures, or applicable law, to undergo a background check should participate in a Non-College Program until a cleared status has been received by the Owners/Operator of the Non-College Program.

G. Reporting of Abuse, Neglect or Any Inappropriate Activity Involving a Minor

Any Authorized Adult who knows, suspects, or receives information indicating that a Minor participating in such program or activity has been abused or neglected, or who has other concerns about the safety of Minors MUST report such suspected abuse or neglect in accordance with accompanying Procedures. *See Appendix A for the Definitions Related to Reporting of Abuse, Neglect or any Inappropriate Activity.* This includes abuse or neglect occurring during College Programs, Service Programs, and Non-College Programs, as well as any abuse or neglect occurring outside of a Program (such as in the Minor's home or any other location outside of Campus).

State regulations require a Mandated Reporter report suspected child abuse when the Mandated Reporter has “reasonable cause to believe” that a Minor is being or has been abused in some way. State regulations do not require the Mandated Reporter to provide conclusive proof that abuse occurred. Educators and other school personnel are neither expected to be, nor should they act as investigators. The benefit of the doubt is always given to the Minor. Waiting for conclusive proof may put a Minor at risk. Failure to make a report can result in criminal penalties. Failure to make a report may also subject a College employee to discipline up to and including termination of employment. Filing a mandated oral and written report in good faith protects the Mandated Reporter from civil and criminal action even if the report is deemed unfounded after investigation.

Massachusetts law allows Mandated Reporters who are members of public or private educational institutions to notify a “Designated Agent” at the institution who then becomes responsible for notifying the appropriate governing agency. The College has designated the College Office of Public Safety as our Designated Agent(s), and Mandated Reporters should report suspected Child Abuse and Neglect immediately to the College Office of Public Safety Emergency Line at 617-333-2222. In addition, promptly notify the Minors Program Coordinator or, if none, the Owner/Operator, dean, or vice president responsible for the area the program falls under when it is safe and appropriate to do so. If applicable, reports should also be made to the College Director of Title IX and Equity Compliance at 617-333-2212 or College Deputy Director of Title IX and Equity Compliance at 617-333-2365.

The College will not retaliate or discriminate against any person who, in good faith, suspects and submits a report of Child Abuse or Neglect.

VI. GUIDELINES FOR INTERACTIONS WITH MINORS

These Guidelines are intended to promote a safe and supportive environment for interactions with Minors and College students, faculty, staff, interns, volunteers, as well as personnel provided by temporary agencies and independent contractors/consultants. All members of the College community as well as independent contractors/consultants, including but not limited to Authorized Adults, are expected to understand and comply with these Guidelines.

Be Mindful of Boundaries: Minors can be particularly vulnerable and require thoughtful, respectful interactions. When engaging with Minors, you must maintain appropriate physical, emotional, and professional boundaries at all times. Under no circumstances should any individual engage in behavior, including speech, gestures, visual materials, or physical contact—that exploits, abuses, harasses¹, or is

¹ “Exploits” refers to taking unfair or unethical advantage of a Minor for personal, financial, sexual, or professional gain,

otherwise inappropriate toward a Minor.

Physical Contact: Physical contact can be easily misinterpreted. Therefore, such contact should be limited, infrequent, and occur only when necessary and appropriate. Individuals must exercise sound judgment and be aware of how physical touch may be perceived or received. Physical contact should never be intrusive, inappropriate, or done in a way that could be misunderstood—even when intended as a form of greeting, care, instruction, or celebration.

Acceptable forms of physical contact with a Minor include:

- High fives
- Handshakes
- Fist bumps
- Pats on the back or shoulder
- Side hugs

Unacceptable forms of physical contact with a Minor include:

- Tickling
- Rough housing
- Wrestling
- Piggyback rides
- Any type of massage
- Any form of unwanted affection.

Discipline: While setting limits with Minors may sometimes be necessary for safety or behavioral reasons, physical discipline is strictly prohibited. In addition, speech, gestures, or other behavior that is bullying, demeaning, belittling, hurtful, intended to embarrass, or that makes gratuitous reference to a Minor's physical development or appearance is never appropriate and will not be tolerated.

One-on-one Interactions: One-on-one meetings with a Minor should be avoided, but, if necessary, should be held in a public area, in a room where the interaction can be (or is being) observed, or in a room with the door left open. College community members should make a reasonable effort to have another adult colleague present when meeting with a Minor. If a private, one-on-one meeting with a Minor cannot otherwise be avoided, a supervisor or another staff member should be notified about the meeting at the same time as the interaction or as soon as is reasonably practicable thereafter.

Drug and Alcohol Use; Other Prohibited Items: All individuals are prohibited from providing a Minor with alcohol, drugs, tobacco products, inappropriate materials (including materials accessed digitally or virtually) or other such items.

including through coercion or manipulation; "abuses" refers to actions or omissions that cause physical, emotional, psychological, or sexual harm to a Minor, including neglect, assault, or other forms of maltreatment; "harasses" refers to subjecting a Minor to repeated or severe unwelcome conduct—verbal, physical, or written—that causes fear, distress, humiliation, or interferes with their sense of safety and well-being.

Gifts: All individuals are prohibited from accepting or giving gifts to Minors without the knowledge of their parents or guardians, and in no case should the value of such gifts exceed \$25.

Communicating with Minors: Communication with Minors should be limited to matters directly related to the operation of the College Program, Service Program, or Non-College Program. Personal communication—such as calling, texting, emailing, or interacting via social media using personal accounts or devices—is not permitted. Discussions of a personal nature are also prohibited unless clearly aligned with the College Program, Service Program, or Non-College Program’s mission and objectives and conducted in an appropriate, professional context.

VII. VIOLATIONS OF POLICY

Violations of this Policy and the accompanying Procedures may result in suspension, termination, other corrective action, and, where appropriate, exclusion from Campus. The College may also take necessary interim actions before determining whether a violation has occurred.

The College may terminate relationships with Non-College Program operators or take other appropriate actions, including contract termination or non-renewal, based on violations of the Policy or Procedures.

VIII. RESPONSIBLE PARTIES REGARDING THIS POLICY

The **Office of Human Resources** is responsible for the following aspects of this Policy and the Procedures:

- Answering questions about the interpretation or application of the Policy and the Procedures
- Maintaining list of Minors Program Coordinators
- Conducting criminal and sex offender background checks (or authorizing Owners/Operators to do so)
- Developing and updating online training that is available to all members of the College community who participate in College Programs and Service Programs

The **Associate Vice President of Finance** is responsible for the following aspects of this Policy and the Procedures:

- Reviewing requests for exemptions from liability waiver and background check requirements
- Answering questions regarding Non-College Program Operators

Each **Owner/Operator of College Programs or Service Programs** is responsible for the following aspects of this Policy and the Procedures:

- Identifying a Minors Program Coordinator for the Office of Human Resources who will be primarily responsible for meeting that school, department, or administrative unit’s obligations
- Ensuring that a cleared criminal and sex offender background check status has been received prior to permitting any member of the College community to participate in College Programs and Service Programs
- Ensuring that every member of the College community who participate in College Programs and

Service Programs certifies that they have completed training (either Policy/document review or online training) and will immediately report instances of known or suspected abuse or neglect of a Minor

- Obtaining waivers of liability from parents/guardians of all Minor participants unless exempted by the Associate Vice President of Finance

The **Director of Conference Services** is responsible for the following aspects of this Policy and the Procedures:

- Serving as the Minors Program Coordinator for the Office of Human Resources who will be primarily responsible for ensuring that the Non-College Program meets their obligations
- Ensuring that the Non-College Program has conducted criminal and sex offender background check status on any Authorized Adult who will participate in Non-College Program
- Ensuring that any Authorized Adult who will participate in Non-College Programs certifies that they have completed training (either Policy/document review or online training) and will immediately report instances of known or suspected abuse or neglect of a Minor
- Obtaining waivers of liability from parents/guardians of all Minor participants unless exempted by the Associate Vice President of Finance
- Ensuring that appropriate contracts are in place with any Non-College Programs Operators

Date of Initial Procedure: September 2021

Date of Policy Revision: February 2026

[Signature of Jay Gonzalez, President]