

CURRY COLLEGE

Procedures for the Protection and Safety of Minors

I. OVERVIEW

These Procedures accompany Curry College's Policy on the Protection of Minors ("Policy"), and are intended as more detailed guidance and support for members of the Curry College ("College") community who sponsor, operate, or participate in programs which include contact with Minors. The Procedures are reviewed and updated periodically by the Office of Human Resources, the Office of Finance, the Conference Center, and other administrative units, as necessary. They establish expectations for interactions with Minors, and apply to College Programs that take place both on- and off- Campus as well as Service Programs. These Procedures also apply to owners, operators, employees, agents, and volunteers of Non-College Programs. Terms used in these Procedures are defined in the Policy.

II. TRAINING

Members of the College community who participate in College Programs that include Minors are expected to receive training in the following areas:

- College Recommended Guidelines for Interacting with Minors
- Warning signs for child abuse or neglect
- A review of the process for reporting potential harm to Minors, including obligations of mandated reporters
- All Authorized Adults participating in College- or Non-College Programs should receive such training prior to being permitted to participate in programs that include Minors

Two levels of training are available: (1) online and (2) policy/document review. The appropriate level of training will vary depending on the type of program, and the level of interaction with the Minor(s).

Owners/Operators are responsible for determining which type of training to provide, and for ensuring the appropriate training is delivered (the Office of Human Resources is available to work with Owners/Operators).

Minimum Training Recommendations:

Type of Service, Program, or Activity	Minimum Training Recommended and Timing Examples
Non-College Program	<p>Policy/Document Review Content: All Authorized Adults should review the Policy and complete the acknowledgement form to confirm their completion of review of the Policy thirty (30) days prior to start of the Non-College Program.</p> <p>Non-College Owners/Operators should maintain a copy of the acknowledgement form.</p>
Off-Campus College Program Examples: outreach or community service programs, projects and activities that involve working with Minors required for academic credit.	<p>Policy/Document Review Content: All Authorized Adults should review the Policy and complete the acknowledgement form to confirm their completion of review of the Policy thirty (30) days prior to start of the College Program.</p> <p>Training: All Authorized Adults should complete a training program about working with Minors and a test of the Authorized Adult's knowledge of the material. The Authorized Adult should sign a training certification form (<i>see</i> Appendix A of the Procedures) thirty (30) days prior to start of the College Program.</p> <p>Minors Program Coordinator should maintain a copy of Authorized Adult certifications.</p>
Service Program Examples: volunteer activities of students, student club activities, activities to support student research projects.	<p>Policy/Document Review Content: All Authorized Adults should review the Policy and complete the acknowledgement form to confirm their completion of review of the Policy thirty (30) days prior to start of the service, program, or activity.</p> <p>Owners/Operators should maintain a copy of the acknowledgement form.</p>

<p>On-Campus College Programs</p> <p>Examples – campus childcare programs, child development programs, orientation programs, summer school programs for high school students, overnight camps operated by the College on campus, internships, and student or other programs that bring Minors to Campus.</p>	<p>Policy/Document Review Content: All Authorized Adults should review the Policy and complete the acknowledgement form to confirm their completion of review of the Policy thirty (30) days prior to start of the College Program.</p> <p>Training: All Authorized Adults should complete a training program about working with Minors and a test of the Authorized Adult's knowledge of the material. The Authorized Adult should sign a training certification form (<i>see Appendix A of the Procedures</i>) thirty (30) days prior to start of the College Program.</p> <p>Minors Program Coordinator should maintain a copy of Authorized Adult certifications.</p>
<p>Minor visitors to campus who are not part of formal services, program, activities or who are accompanied by their parents or teachers.</p> <p>Examples – Minors who attend campus events or visit an “open” campus.</p>	<p>None</p>

III. CRIMINAL AND SEX OFFENDER BACKGROUND CHECKS

Criminal and sex offender background checks are required of the following groups participating in a service, program, or activity involving Minors unless an exemption is obtained from the Associate Vice President of Finance. This includes:

- Authorized Adults participating in College Programs
- Authorized Adults participating in Non-College Programs
- College students, faculty, staff participating in Service Programs

A. College Programs and Service Programs

The Office of Human Resources administers the processing of criminal and sex offender background checks. Certain Owners/Operators may be authorized by Human Resources to process these background checks directly. Owners/Operators are responsible for 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 or Service Programs.

Background checks must be conducted by the College, or other external source approved by the College,

and consist of a social security number trace, address locator for seven years, a search of federal and state/county databases for criminal history for the past seven years, and a sex offender registry check. If a background check reveals adverse information or unfavorable results, the College's Vice President of Human Resources will make a final determination regarding participation in the activity.

Once a satisfactory background check has been received, members of the College community who participate in College Programs or Service Programs must promptly disclose any new felony or misdemeanor conviction(s) to the Office of Human Resources. College faculty and staff who have a break in service of more than six (6) months, unless it is an approved leave of absence, and students who withdraw, are suspended or dismissed, or take leaves of absence of more than six (6) months, must undergo a new background check if they reengage in College Programs or Service Programs. Except where required by law, the results of criminal and sex offender background checks are kept confidential by the College.

Criminal and sex offender background checks are required for the following populations, if they will have direct and unmonitored contact with Minors (contact with Minors when there is no background check cleared employee or volunteer present):

Category	Frequency of Background Check
College Student – Full-Time or Part-Time Matriculated	Every three (3) years
College Student – Part-Time Non-Degree	Annually
Faculty/Staff Full-Time	Every three (3) years
Faculty/Staff Part-Time	Annually
Volunteers (excluding College faculty, staff, students)	Annually

Programs (such as summer camps and others) that are required by law to conduct criminal and/or sexual offender background checks on a more frequent or different basis may have obligations that supersede this Policy.

B. Non-College Programs

Owners/Operators of Non-College Programs must conduct criminal and sex offender background checks of owners, operators, employees, agents, and volunteers who will participate in Non-College Programs. A certification that background checks have been completed will be required. No Non-College Program owner, operator, employee, agent, or volunteer may participate in a Non-College Program until a cleared status has been received by the Owner/Operator. The College may request any additional information from Non-College Programs it deems necessary to meet the requirements of the Policy and these Procedures.

IV. REPORTING SUSPECTED ABUSE OR NEGLECT OF MINORS

A. Reporting Obligations

Any member of the College community must immediately report any instance of known or suspected

abuse or neglect of a Minor to the College Department of Public Safety, the Minors Program Coordinator, or the Office of Human Resources.

In addition, members of the College community who are considered mandated reporters under Massachusetts law must also report to the Massachusetts Department of Children and Families (DCF) and College officials any known or suspected mental/physical abuse or neglect of a Minor they have come into contact with through their professional role. Mandated reporters under Massachusetts law include but are not limited to:

- Physicians
- Psychologists
- Clinical social workers
- Medical interns
- Dentists
- Teachers
- Counselors
- Police officers
- Allied mental health and licensed human services professionals
- Early childhood education and childcare staff
- Clergy members

Questions about who is a mandated reporter under Massachusetts laws should be directed to the Office of Human Resources at 617-333-0500.

B. Reporting Suspected Abuse or Neglect of a Minor

Notify College Department of Public Safety. Immediately contact the College Department of Public Safety at 617-333-2232 or dial 911 if off campus. Remain with the Minor until they are safe. A member of College Department of Public Safety team is available 24 hours a day to respond. The College Department of Public Safety will coordinate with other areas within and outside the College to investigate the alleged abuse or neglect, and notify parents or guardians, if appropriate. All actions will be handled in a manner that safeguards minors, protects the interests of victims and reporters, and meets relevant legal requirements.

Mandated reporters must also report directly to the DCF by calling the local DCF office (weekdays, from 9:00 a.m. to 5:00 p.m.) or the Child-At-Risk Hotline at (800) 792-5200 (evenings and weekends) and as additionally required by that agency.

Notify Appropriate College Official. 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.

Questions. Questions about obligations or what to do in an uncomfortable situation may be discussed with the Office of Human Resources.

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

V. COMPLIANCE WITH LAWS

There are several Massachusetts and local laws that apply to services, activities, and programs involving Minors. Ensuring compliance is the responsibility of the College Program, Service Program, or Non-College Program. Questions concerning the applicability of these laws or regulations to a particular service, program, or activity may be directed to the Office of General Counsel.

- Massachusetts Department of Public Health's "Minimum Sanitation and Safety Standards for Recreational Camps for Children" at 105 CMR 430.000
- Massachusetts Mandated Reporter Law, at M.G.L. c. 119, § 51A
- Department of Early Education and Care (EEC) regulations at 606 CMR 7.00

VI. LIABILITY RELEASE

Prior to the start of each College Program or Non-College Program, Owners/Operators or Minors on Campus Coordinators will require the parents/guardians of participating Minors to execute the College Parental Acknowledgment, Consent, and Release from Liability form (Appendix B), unless an exemption is obtained from the Associate Vice President of Finance.

Non-College Programs may require the parents/guardians of Minor participants to execute an alternative waiver form provided such form contains substantially all of the same terms as those included in the College's form (Appendix B), including, but not limited to, specifically releasing the College from any and all liability arising out of the operation of the Non-College Program.

VII. NON-COLLEGE PROGRAMS

Owners/Owners of Non-College Programs are responsible for:

- Ensuring any employee, agent, or volunteer that participates in the Non-College Program receives training
- Ensuring that cleared criminal and sex offender background checks are secured prior to permitting any employee, agent or volunteer to participate in a Non-College Program
- Reporting known or suspected abuse or neglect of a Minor to College Department of Public Safety and College officials, as outlined in Section IV(B) (and to DCF, for mandated reporters)
- Ensuring compliance with federal and state laws, including 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
- Entering into a contract with the College prior to operating program involving Minors. If not the Non-College Program does not use the College's standard contract template, the Non-College Program must include contract addendum (Appendix D)
- Obtaining waivers of liability from parents/guardians of all Minor participants (Appendices B and C)

- Carrying appropriate insurance that meets requirements designated by the College's Office of Finance

Date of Initial Procedure: February 2026

[Signature of Signature of Jay Gonzalez, President]