



EMPLOY MILWAUKEE POLICY 21-01 CHANGE 2

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POLICY: 21-01, CHANGE 2

SUBJECT: CHILD PROTECTION

ISSUANCE DATE: 08/29/24

EFFECTIVE DATE: 08/29/24

REVIEWED DATE: Not applicable

REFERENCES:

- WI Chap 48
- United Way Policy of Protecting Children July 1, 2011
- A to Z Youth Center Child Abuse Prevention Policy

POLICY SCOPE

- EMPLOY MILWAUKEE AGENCY
- WIOA WDA 2 SYSTEM
- WIOA TITLE I-B PROGRAM(S)
 - ADULT PROGRAM
 - DISLOCATED WORKER PROGRAM
 - YOUTH PROGRAM
- NON-WIOA PROGRAMS
- RE ENTRY PROGRAMS

I. BACKGROUND

Employ Milwaukee, Inc. (EMI) is committed to protecting the safety of its employees and program participants. Employ Milwaukee encounters numerous youths throughout its' programs, from In School and Out of School Youth to the Summer Earn and Learn program. It has become imperative that we set forth a Child Protection Policy.

II. PURPOSE

The purpose of this policy is to empower staff members and community partners to prevent, recognize, and react responsibly about all forms of child abuse and act as mandated reporters. It is the expectation that EMI's programs take place in safe environments that foster healthy relationship building between adults and youth and between youth and youth. All youth and their parents or caregivers, including EMI staff and board members must be confident that a positive environment exists.

III. POLICY

- A. To reduce the risk and foster a positive environment for youth, EMI:
 1. Screens and selects EMI employees through rigorous process. All employee and applicants complete the following prior to working with youth:
 - i. Professional Reference Checks
 - ii. Criminal Background Check
 - iii. Interview – conducted in person whenever possible
 2. Fosters positive youth development that serve as protective factors for youth. In promoting and ensuring such positive interactions, EMI identifies behaviors that fall into the categories of appropriate and inappropriate/harmful. While no list can be all inclusive, the following guidelines are provided to ensure positive and appropriate interactions among youth and between staff set general behavioral expectations.
 - i. Verbal Communication

EMPLOY MILWAUKEE POLICY 21-01 CHANGE 2

1. Appropriate: praise; positive reinforcement for good work or behavior.
 2. Inappropriate/harmful: sexually provocative or degrading comments or put downs; risqué jokes; or use of obscene language.
 - ii. Physical Behavior
 1. Appropriate: pats on the back or shoulder or high fives. Note that the use of any physical contact should be used with discretion.
 2. Inappropriate/harmful: patting the buttocks; intimate/romantic/sexual contact; corporal punishment (involving physical contact or inflicting pain or discomfort); or involving youth in any pornographic activities.
 - iii. Additional Interaction Guidelines (This is not an all-inclusive list of appropriate and inappropriate actions.)
 1. EMI promotes activities that help youth develop socially, emotionally, and cognitively.
 2. Adults are encouraged to help safeguard youth from all types of inappropriate situations.
 3. The youth must also be clearly instructed on how to promote positive interactions and what constitutes inappropriate or harmful interactions.
 4. EMI requires that, whenever possible, more than one adult is present with one or more youth. The policy discourages one-on-one interactions.
 5. In the event that one of the two adults temporarily leaves a room in which there are youth, the door must be fully open and, when possible, another EMI screened adult will be made available.
 6. In the case of an organized activity or fieldtrip, two or more adults will be required for chaperoning youth and ratio of adult to youth will be at least 1:10. Additional adult supervision may be expected based on the activity, ages of youth, and the level of risk of the activity. Off-site adult supervision is enforced with an assigned staff coordinator.
 - iv. EMI requires that two or more youth will not be left without adult supervision. This helps to reduce the risk of unsupervised youth emotionally (bullying), physically, or sexually abusing other youth.
3. Ensure safe environments
- i. Monitor behavior. Through formal and informal supervision EMI staff prevent, recognize, and respond to inappropriate and harmful behaviors, document concerns, and reinforce appropriate behaviors.
 - ii. Encourage staff to engage in ongoing, active interaction with youth to ensure higher level of youth supervision and monitoring.
 - iii. Conduct periodic, unscheduled observation of these interactions as a quality control measure. When warranted, unusual, or questionable behaviors occur, there will be a review which will be recorded.
 - iv. Consider the location and time of day of each activity
 - v. Uses spaces that are open and visible to multiple people, with no concealment, and are well-lit.
 - vi. Allow for privacy, when appropriate (e.g. toileting, showering, changing clothes etc.)
 - vii. Secure areas not used for programming to prevent youth from being isolated.
 - viii. Keep computers in an open lab area.

EMPLOY MILWAUKEE POLICY 21-01 CHANGE 2

1. Staff will closely monitor youth's use of the Internet.
 2. Youth are:
 - a. instructed on not sharing personal information with strangers, posting on websites, and cautioned about the use of social networking.
 - b. required to advise Employ Milwaukee staff if he or she receives emails or messages that are sexual in nature.
 - c. Required to sign an agreement that they will comply with all Internet safety guidelines established by Employ Milwaukee.
 - ix. Conduct academic assistance onsite at the partner agency unless authorized by the (partner) agency's Program Director.
 - x. Prohibit the transportation of any client. Details are provided in the Employ Milwaukee Employee Handbook.
- B. Responding to Inappropriate Behavior, Breaches in Policy, and Allegations and Suspicions of Child Abuse.
1. Any time EMI staff have reasonable cause to suspect that a child seen in the course of their professional duties has been threatened with or is being abused or neglected shall report their suspicion to the local child protective services entity or law enforcement in cooperation with their supervisor.
 2. Staff will act immediately to address imminent, clear and present dangers to the safety and well-being of persons served and themselves.
 3. Reports of inappropriate/harmful behaviors, regardless of the severity, must be made as soon as it is safe to do so by the staff who first learn of the alleged abuse to Employ Milwaukee Complaint Coordinator and their supervisor. In non-emergency situations, reports are made to EMI prior to reporting to authorities. Reports are confidential and need to include the nature and extent of the abuse, the alleged perpetrator, and other relevant information including:
 - i. Alleged perpetrator
 1. Names, phone numbers, and address
 2. Current location including potential dangers in the environment (i.e. weapons, animals)
 3. Current access to youth
 4. Relationship to youth
 5. Abuser's current mental, emotional or physical state if known
 - ii. Youth information
 1. Name, age, and address of the youth
 2. Current location including potential dangers in the environment (i.e. weapons, animals)
 3. Specific allegations including description of injuries when applicable
 4. Current condition of the youth (i.e.: youth is alone, in need of medical treatment)
 - iii. Other
 1. Actions already taken by you or other professionals
 2. Reporting person's name, phone numbers, and address
 3. Names, phone numbers, and addresses of parents and other caregivers (if

EMPLOY MILWAUKEE POLICY 21-01 CHANGE 2

- not the alleged perpetrator)
4. Names, phone numbers, and addresses of witnesses
 4. EMI representatives do not investigate nor make a determination as to whether or not abuse or neglect has occurred.
 5. If an allegation appears to have reasonable cause:
 - i. A summary will be submitted to the EMI CEO
 - ii. A formal report will be completed by Employ Milwaukee, who is professionally and legally accountable for ensuring that all cases of abuse are reported to the proper authorities to Child Protective Services or local law enforcement.
 6. Confidentiality shall be maintained throughout the process.
- C. Responses to Cases of Child of Abuse - An allegation does not equate to guilt. However, Employ Milwaukee must take steps to protect the youth in its care.
1. If the alleged offender is an employee, they will be placed on suspension immediately following the report of the case to external authorities. Disciplinary procedures up to and including termination may be applied. See the Employee Handbook for disciplinary and appeal details.
 2. The youth and their family may be referred to
 - i. Social and emotional support services including but not limited to:
 1. Prevent Child Abuse America, 1-312-663-3520, www.preventchildabuse.org
 2. Childhelp USA® National Child Abuse Hotline, 1-800-422-4453, www.childhelpusa.org
 3. U.S. Department of Health & Human Services, 1-800-394-3366, <http://nccan.ch.acf.hhs.gov>
 - ii. Restorative justice support such as:
 1. Wisconsin Community Services, Inc. at 414-290-0400
 2. Marquette University Law School at 414-288-7090
 3. Community Conferencing Program at 414-278-4644
- D. Employ Milwaukee staff are required to know the policies and procedures for reporting suspected abuse, including to whom and in what format reports are made. Training is provided during staff orientation and annually.

IV. ACTION REQUIRED

- Signed acknowledgement form for each employee.
- Distribution of this policy to all Employ Milwaukee staff.
- Posting of this Policy to the Employ Milwaukee website for open access to all personnel

REVISIONS: Policy 12.01, Change 1, Eff 02.25.21

BOARD APPROVAL DATE: 08/29/24

EMPLOY MILWAUKEE POLICY 21-01 CHANGE 2

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