

**TOWN OF LOCKEPORT
POLICY STATEMENT**

**Child Protection Standard
Procedures Policy**

Policy # GG-045

POLICY

Effective Date:

**Revision Date:
February 22, 2024**

Purpose:

To support our daily operations with a deep commitment to ensuring all children are protected and safe. The safety, rights and wellbeing of children served by the Town of Lockeport is fundamental to our goals.

Maintaining personal boundaries is integral to developing healthy relationships with children and families. Behavior that presents risk often begins by breaking boundaries with children and teens. To help caring adults understand what is expected, these Standard Procedures include information about the type of behavior expected, and it provides clear direction to those who either directly observe behavior of concern, or who learn about behavior of concern from others.

The intent of the Child Protection Standard Procedures is to guide caring adults in developing healthy relationships with the children involved in activities delivered by the Lockeport Recreation Department. We believe that by providing caring adults with the guideposts against which they can measure their own behavior and the behavior of those around them, they will be empowered to identify and address behavior of concern at an early stage to help better protect children.

Guidelines for Treating Children with Dignity and Maintaining Boundaries:

All caring adults are responsible for treating children with respect and dignity, and for maintaining appropriate boundaries. Caring adults must monitor their own behavior towards children, and be aware of the behavior of their colleagues, to ensure that behavior is appropriate and respectful, and will be perceived as such by others. If at any time you are in doubt about the appropriateness of your own behavior or the behavior of others, you should discuss it with your supervisor. Refer to the Reporting Requirements section for further guidance.

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Before engaging in any behavior or activity with a child, and when considering how your behavior or the activity may be perceived by the child and by others, you should consider whether:

- The activity or behavior you are engaging in with a child is known to, and approved by, your supervisor and/or the parents of the child. All interactions with a child should be transparent;
- The activity or behavior you are engaging in would raise concerns in the mind of a reasonable observer as to its appropriateness;
- The activity or behavior is directly and objectively tied to your job function;
- The Lockeport Recreation Department may be detrimentally affected by the activity or behavior.
- The activity or behavior may be reasonably regarded as posing a risk to the child;
- The activity or behavior may contribute to a child's discomfort;
- The activity or behavior may appear inappropriate to the organization's, the child's family, or the public.

In addition, always consider the child's reaction to any activities, conversations, behavior, or other interactions, and avoid criticizing, embarrassing, shaming, blaming, or humiliating a child. Do not place inappropriate expectations on a child. Use your instincts as a guide.

Ask yourself; "Whose needs are being met by the activity or behavior?" The purpose of an activity or behavior should always be to meet the child's needs, not the adult's needs.

Tip: If the child seems uncomfortable with the activity or behavior, it is a good indication that the activity and/ or behavior is unwelcome and should stop. You need to assess the activity or behavior and consult with your supervisor before continuing.

General Rules of Behavior:

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Lockeport Recreation Department Leaders Must:

- Treat all children with respect and dignity;
- Establish, respect, and maintain appropriate boundaries with all children involved in activities or programs delivered by the organization;
- Always adhere to the organization’s policies and procedures in dealing with children;
- Treat all disclosures, allegations, or suspicions of sexual or other unlawful or inappropriate behavior involving a child seriously-a caring adult must report all disclosures, allegations, or suspicions of inappropriate or unlawful behavior as set forth in these Child Protection Standard Procedures.

Lockeport Recreation Department Leaders Must Not:

- Engage in any sort of physical contact with a child that may make the child, or a reasonable observer feel uncomfortable, or that may be seen by a reasonable observer to be violating reasonable boundaries;
- Engage in any communication with a child within or outside of work that may make the child uncomfortable or that may be seen by a reasonable observer to be violating reasonable boundaries.
- Engage in any behavior that goes against (or appears to go against) the organizations’ mandates, policies, Code of Conduct, or Child Protection Standard Procedures, regardless of whether they are serving the organization at that moment.
- Conduct their own investigation into allegations or suspicions of inappropriate behavior – it is a caring adult’s duty to report the matter to his/her supervisor or child welfare, not to investigate.

Ranges of Inappropriate Behavior:

It is important for all Recreation Department leaders to understand that behaviors, as they relate to the safety and protection of children, fall into a continuum.

At one end of the continuum are those behaviors that are unlawful. Unlawful behaviors are those that are criminal or that breach child welfare or related legislation, and include such things as child abuse, sexual assault, sexual interference, invitation to sexual touching, sexual

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exploitation, procurement, luring child pornography offences, corrupting morals, indecent acts, voyeurism, etc.

Unlawful behaviors need to be reported to the child welfare agency and/or law enforcement for investigation.

At the other end of the continuum are those behaviors that are inappropriate but are of such a nature that it is believed they can be addressed and corrected through additional training, supervision, and monitoring.

Inappropriate behavior could range from one-time behaviors to multiple instances and could include behavior that is repeated even after it has been brought to the attention of the employee. It includes such things as telling inappropriate jokes to or in earshot of a child, confiding in a child with personal stories, and having unauthorized contact with a child outside of work duties.

Inappropriate behavior needs to be brought to the attention of management so it can be followed up formally and internally. The Recreation Department will determine if the behavior is inappropriate and how it will be addressed.

In the middle of the continuum are those behaviors that may be unlawful or inappropriate, depending on the overall circumstances. Or, it may be behavior that is initially seen as behavior that could be corrected through additional training, supervision, and monitoring, but upon following up and learning more information, it is determined the behavior is more serious and warrants a formal investigation.

For the protection of children in our care, all instances of inappropriate behavior will be followed up on. Behaviors of concern will be reported to the child welfare agency, law enforcement or the licensing body for the individual for further investigation whenever we deem such action be warranted.

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What constitutes Inappropriate behavior:

Inappropriate behavior will not be tolerated, especially as it relates to the well-being of the children involved in programs of the Lockeport Recreation Department.

Behavior considered inappropriate is that which may be seen by a reasonable observer to be violating reasonable boundaries, and includes, but is not limited to, the following:

- Favouring one or more children to the exclusion of others (for example, paying a lot of attention to, or giving or sending personalized gifts*, or allowing privileges that are excessive, unwarranted or inappropriate, *Note* It is not inappropriate behavior to give a contextually appropriate thank-you card, birthday card, or other nominal gift to the child, where such a gesture would be considered reasonable under the circumstances, provided that all gestures taken together are not excessive in number and that such exchanges are carried out within a work context, in the presence of other adults and with the full knowledge and consent of the organization.*
- Using a personal cell phone, camera, or video to take pictures of a child or youth who has not given consent and whose parents have not given consent. Pictures taken in a work related setting, with prior written consent from the parent/guardian, and in circumstances in which the parent/guardian and your supervisor is aware that pictures are being taken may be permissible provided the organization has approved the activity in advance and has put procedures in place to ensure the pictures will be stored in a location only accessible to those with a need to access and removed when no longer required for the purpose for which they were taken;
- Offering or providing rides to a child in your personal vehicle, or in the organization's vehicle, except when your supervisor is aware of and has approved it, and express parental consent has been granted, or in emergency situations. *You must report all rides you give to a child, whether in your own vehicle or in the company vehicle, to your supervisor.*

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In addition to the foregoing, the following behavior is considered serious and may trigger a report to child welfare in addition to any other internal disciplinary procedures:

- Telling sexual jokes to a child or making comments to a child that are in any way suggestive, explicit or personal;
- Showing a child material that is sexual in nature, including signs, cartoons, graphic novels, calendars, literature, photographs, and screen savers, displaying, or keeping such material in a location where it is reasonably possible that a child may see it, or making such material available to a child;
- Physically or emotionally harming a child;
- Intimidating or threatening a child;
- Making fun of a child.

Whether or not a particular behavior or action constitutes inappropriate behavior will be a matter determined by the organization having regard to all of the circumstances, including past behavior, and allegations or suspicions related to such behavior.

Reporting Requirements:

All caring adults are required to report unlawful behavior to police/child welfare and inappropriate behavior or incidents to their supervisor. This requirement applies not only to behavior or incidents that you personally witness, but also to those that you hear about.

Adults often worry that they may be overreacting and misreading a situation, and this may cause them to minimize concerning behavior they witness or hear about. There is also a fear of damaging a working relationship by raising a concern about a work colleague. It can be hard to believe that someone you work with or someone you met through your work duties could harm a child, and it can be tempting to downplay a transgression in the hopes it will not be repeated.

Keep in mind that the focus always must be on the behavior, not the person. A person's character or their position in the organization has nothing to do with whether that person's behavior is appropriate or inappropriate in each situation. It cannot be about whether you are "right" or "wrong," it must be about doing the best you can to identify behavior of concern so it can be dealt with appropriately.

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Categories of incidents that need to be addressed by staff/volunteer under these Child Protection Standard Procedures include the following:

1. Reports of Unlawful Behavior from a child involving a caring involved in the Lockeport Recreation Department a Third Party. Disclosures or allegations of unlawful behavior reported to an employee by a child regarding either;
 - a. Another employee/volunteer of the organization; or
 - b. Someone other than a staff member, volunteer, or mentor of the organization (e.g., parent, teacher, babysitter, coach);**Must be reported** to child welfare and/or police in accordance with the Reporting and Documenting Complaints Policy re: Potentially Unlawful Behavior.

2. Unlawful Behavior witnessed by a caring adult involved in the Lockeport Recreation Department programs. Any incident of alleged unlawful behavior either;
 - a. Witnessed by a staff member, volunteer or mentor regarding another coach, volunteer, or mentor of the organization; or
 - b. Witnessed by a coach, volunteer, or mentor regarding someone other than a coach, volunteer, or mentor of the organization (e.g. parent);**Must be reported** to child welfare and/or police. If you do not know the identity of the child, take steps to find out who the child is – depending on the situation, steps may need to be taken to protect that child from additional harm, the child may need to make a statement to the police, etc.

Note If you are a witness to abuse in progress, it is expected that in addition to reporting what you see, you will also do what you reasonably can to stop or disrupt the interaction. The steps may vary according to what you are witnessing and what personal safety considerations may exist for you and/or the child being abused. If you do not feel you can intervene safely, you should immediately get additional help, whether by calling the police, involving other employees, etc.*

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3. Inappropriate Behavior Involving a Caring Adult. Inappropriate behavior that is either:
- a. Reported to the caring adult by a child or third party regarding another staff member, coach, volunteer, or mentor of the organization: or
 - b. Witnessed by a staff member, coach, volunteer, or mentor and involving another coach, volunteer or mentor;
- Must be Reported to the organization. In addition to reporting, if you witness inappropriate behavior, you should take steps that can safely be taken to stop or disrupt the interaction, as outlined in #2 above.

IMPORTANT NOTE* If you are not sure whether the issue you have witnessed or heard about involves unlawful behavior, or inappropriate behavior, discuss the issue with your supervisor who will guide you through the process. Remember: You have an independent duty to report all unlawful behavior directly to child welfare.

Consequences of Failing to Adhere to these Child Protection Standard Procedures:

Depending on the circumstances, failure to adhere to these Child Protection Standard Procedures by a Lockeport Recreation Department leader adult may result in:

- Follow-up by the organization to (1) gather information about what happened and (2) determine what, if any, disciplinary action is required; and/or
- A report to child welfare or law enforcement (or both).

Consequences, disciplinary or corrective actions will be determined by the Community Coordinator for the Town of Lockeport and will be based on the nature and severity of the incident, as well as information learned during follow-up and any past behavior of concern.

If, in following up on a concern, we believe the behavior exhibited by an employee, volunteer or third party may constitute unlawful behavior, we will report the behavior to child welfare and possibly law enforcement.

In addition, in circumstances where multiple behaviors are reported, where inappropriate behavior is recurring, or where one instance of inappropriate behavior is of critical concern, the organization may refer the matter to child welfare, law enforcement or the employee's licensing body for investigation. Failure to adhere to the Code of Conduct to Protect Children

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by any caring adult will result in follow-up to investigate the situation and disciplinary action if necessary. Appropriate consequences/disciplinary actions are to be determined by management and will be based on the nature and severity of the incident.

I, _____ agree to comply with the Child Protection Standard Procedures for the Lockeport Recreation Department.

Leader's Signature

Witness' Signature

Witness' Printed Name

Date

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Town Clerk/Treasurer's Annotation for Official Policy Book

Date of Notice to Council Members
Of Intent to Consider (7 days minimum): February 2, 2024

Date of Passage of Current Policy: February 12, 2024

I certify that this Policy was adopted by Council as indicated above.

June Harding
Town Clerk/Treasurer

Nov. 19/24
Date

February 22, 2024
Revision Date