

LEROY SPRINGS & COMPANY, INC. CHILD & YOUTH PROTECTION POLICY

Purpose

Leroy Springs & Company, Inc. ("LSC") is committed to maintaining a safe environment in which children and youth are protected from sexual abuse, physical abuse and/or neglect. The purpose of this policy is to protect children and youth in all settings and programs, to educate employees and volunteers concerning abuse issues, and to protect staff and volunteers, as well as LSC, from potential allegations of abuse and neglect.

Scope

This policy applies to all programs, activities, and services provided by all departments of LSC, volunteer groups, and by non-LSC groups on LSC-owned property or using LSC facilities. Programs covered under this policy include, but are not limited to, afterschool programs, summer camps, clinics/classes, guided programs, mentorship or internship opportunities, or other programs and activities intended for minors, regardless of the frequency or duration of program activities, and regardless of whether the program involves an overnight stay as part of the program or course. This Policy does not apply to events that are open to the general public (such as weddings, festivals, concerts, or community events) or private events hosted at LSC facilities where parents or guardians are expected to provide supervision of minors in their care.

LSC's Youth & Child Protection Policy is contained in three parts, consisting of (i) safety requirements, (ii) hiring practices, background check and training requirements, and (iii) reporting requirements.

I. Safety and Well-Being of Minors:

All members of the LSC community, employees, and volunteers are expected to be positive role models in their interactions with minors by behaving in a caring, honest, respectful, and responsible manner. LSC has adopted the following policies for the safety and well-being of minors consistent with the Purpose set forth above. While these policies primarily protect minors, they also serve to protect employees, volunteers, and independent contractors who work with minors.

1. **One-on-one contact between adults and minor youths is prohibited.** In situations requiring a personal conference, the meeting is to be conducted with the knowledge and in view of other adults and/or youths.
2. **No one-on-one contact between adults and minor youths includes telephonic/digital communications.**
 - a. **Social Media:** LSC employees, volunteers, and/or independent contractors may not engage with minor youths through private online gaming or privately on any form of social media. For purposes of this policy, the term "social media" means websites and applications that enable users to create and share content of any kind, type or quality (except texting/messaging which is addressed below), or to participate in social networking through online interactions. Nothing herein prohibits the use of social media in public or group interactions.
 - b. **Texting:** Texting or messaging apps (including Snapchat, WeChat, WhatsApp, Facebook Messenger and similar instant messaging apps) may not be utilized to communicate one-on-one with minor youths; *provided, however*, that such applications may be used for one-on-one communications (i) in the event of an emergency; or (ii) by LSC employees (or their delegates)

who need to communicate with minor youths in order to perform the essential functions of their jobs.

- c. Emails: Emailing one-on-one with minor youths is prohibited except by LSC employees (or their delegates) who need to communicate with minor youths in order to perform the essential functions of their jobs. All other email communications with minor youths shall be copied to either a parent or other adult LSC employee.
 - d. Telephone: Private telephone conversations with minor youths are prohibited except (i) in the event of an emergency; (ii) by LSC employees (or their delegates) who have a need to communicate with minor youths in order to perform the essential functions of their jobs.
3. **Inappropriate use of smart phones, cameras, imaging, or digital devices is prohibited.** The use of any device capable of recording or transmitting visual images in or near showers, restrooms, or other areas where privacy is expected is inappropriate. Recording visual images in or around such areas is prohibited.
 4. **No bullying/abusive behavior.** Engaging in any abusive conduct of any kind toward or in the presence of a minor, including but not limited to verbal abuse, cyberbullying, striking, hitting, punching, poking, spanking, or restraining is prohibited. If restraint is necessary to protect a minor or others from harm, all incidents must be documented and immediately disclosed to the person in charge of the program and the minor's parent/legal guardian. This policy extends to youth-on-youth behavior.
 5. **Socializing.** Socializing with minor program participants outside the program or inviting minors to one's home is not permitted. Engaging in any sexual activity, making sexual comments, telling sexual jokes, or sharing sexually explicit material (or assist in any way to provide access to such material) with minors or in the presence of minors is prohibited. Additionally, engaging in or allowing minors to engage you in conversations regarding your romantic, sexual, or related matters, is prohibited unless required in your professional capacity.
 6. **Drugs, Alcohol & Tobacco Products; Other Prohibited Behaviors.** Using, possessing, or acting/working under the influence of alcohol, tobacco products or illegal drugs while on duty or when responsible for a minor's welfare is not permitted. Facilitating a minor's access to alcohol, tobacco products or illegal or prescription drugs, pornography, or gambling is prohibited.

Occasionally, an individual in charge of a program or event may find it necessary to provide additional guidance regarding appropriate and inappropriate behaviors specific to the program. In such case, the program supervisor should contact the appropriate LSC Director for assistance in formulating additional guidance under this policy.

II. Hiring Practices, Background Checks and Training

1. Criminal Background Checks

All individuals who work with minors in LSC activities that involve interaction with minors must successfully complete a criminal background check. LSC requires a criminal and civil background check of state and national criminal records and sexual offender registries. The background check requirement does not pertain to individuals interacting with minors in programs/events open to the public where the minor remains under the supervision of a parent, guardian, teacher or other third-party adult. When background checks are required, it is the responsibility of the program supervisor to ensure that all program staff, paid or unpaid, including but not limited to employees, volunteers, or other third parties who work directly with minors have successfully completed a criminal background check acceptable to the LSC Human Resources Department.

2. Reference Checks

Reference checks will be conducted for all full-time and part-time LSC employees and may be required for volunteers.

3. Youth Protection Training for LSC Employees

- a. All LSC employees, regardless of their job function, role, or location of employment, are required to complete the Darkness to Light, Stewards of Children, Youth Protection Training within their first 90 days of employment. This training program provides helpful information on preventing and reporting suspected child abuse and steps that should be taken to protect the wellbeing of minors.

4. Youth Protection Training for LSC Volunteers

- a. Darkness to Light, Stewards of Children Youth Protection Training may be required for specific volunteer roles based on, but not limited to, three factors:
 1. The program or event the volunteer will be assisting with.
 2. The potential for interaction between the volunteer and minors attending programs without their parent or legal guardian.
 3. The expected level of direct and continual supervision of another LSC employee.
- b. Determination on the need for volunteers in specific roles to complete this training will be made by the appropriate Department Director and/or Program Supervisor in consultation with the Human Resources Department.
- c. If the determination is made that a specific volunteer role does require the Darkness to Light, Stewards of Children Youth Protection Training then this training must be completed by the volunteer prior to beginning their hours with the specified program or event.

5. Mandated Reporter Training

- a. Completion of the Recognizing and Reporting Child Abuse and Neglect Training, found on the SC Department of Social Services website, may be required for specific employees based on their job function and/or responsibilities.
- b. Determination on the need for employees in specific roles to complete this training will be made by the appropriate Department Director and/or Program Supervisor in consultation with the Human Resources Department.

III. Reporting

There are two types of youth protection–related reporting procedures that LSC employees, independent contractors, and volunteers must follow:

- When you witness or suspect any child has been abused or neglected – See “Mandatory Report of Child Abuse” below.
- When you witness a violation of the LSC’s Child & Youth Protection Policy – See “Reporting Violations of LSC’s Child & Youth Protection Policy” below.

1. Mandatory Reporting of Child & Youth Abuse

- a. South Carolina law requires certain professionals who are at least 18 years old to report suspected child abuse and neglect. Because they have unique opportunities to observe and interact with children, individuals subject to this reporting obligation include, but are not limited to physicians, nurses, emergency medical professionals, mental health professionals, school teachers, counselors, principals, and childcare workers in childcare centers. S.C. Code § 63-7-310.

- b. When to Report: Mandated reporters must report suspected child abuse or neglect when, in their professional capacity, they receive information giving them reason to believe that a child’s physical or mental health or welfare has been or may be adversely affected by abuse or neglect.
 - 1. Reporting to a supervisor or person in charge of an institution, school, facility, or agency does not relieve a mandated reporter of his or her individual duty to report, and the duty to report is not superseded by an internal investigation within an institution, school, facility, or agency.
 - 2. Although state law does not specify a time frame for reporting, it is best to make a report as soon as reasonably possible in order to protect the child. If a mandated reporter fails to report when required, that person is guilty of a misdemeanor and upon conviction, may be fined up to \$500 or imprisoned up to 6 months, or both. S.C. Code § 63-7-410.
 - c. Where to Report: South Carolina law allows mandated reports to report to either the Department of Social Services or law enforcement in the county where the child resides or is found.
 - d. Confidentiality: South Carolina law requires the Department of Social Services and law enforcement to keep the identity of the reporter confidential.
 - e. Immunity from Liability: Mandated reporters are protected from civil and criminal liability provided they have acted in good faith in reporting suspected abuse and neglect. S.C. Code § 63-7-390.
 - f. For more detailed information regarding recognition of child abuse and neglect and Mandated Reporter requirements, see the South Carolina Law Center’s Mandated Reporter Guide at <https://dss.sc.gov/media/1903/dss-brochure-1955-jan-19.pdf>.
- 2. Reporting Violations of LSC’s Youth Protection Policies**
- a. Any LSC employee, volunteer, independent contractor, guest, participant, or user who witnesses a violation of the LSC’s Youth Protection Policy are required to immediately report the violation to their supervisor or the appropriate program supervisor.
 - b. LSC will not tolerate retaliation against persons who report suspected child abuse or neglect. Any such retaliation, or encouragement of another to retaliate, is a serious violation of LSC policy, independent of whether the particular report is substantiated, and could result in discipline, up to and including termination. If you believe you have been subjected to retaliation in violation of this rule, you should contact the LSC Vice President of Human Resources.

REPORTS OF SUSPECTED CHILD ABUSE OR NEGLECT MUST BE MADE IN GOOD FAITH AND NOT OUT OF MALICE OR ILL-WILL. KNOWINGLY MAKING A FALSE OR FICTITIOUS ALLEGATION OF CHILD ABUSE OR NEGLECT IS A CLASS A MISDEMEANOR UNDER SOUTH CAROLINA LAW PUNISHABLE BY A FINE OF UP TO \$5,000 OR 90 DAYS IMPRISONMENT (S.C. Code § 63-7-410). ADDITIONALLY, A FALSE OR MALICIOUS ALLEGATION OF CHILD ABUSE OR NEGLECT WILL BE TREATED AS A SERIOUS OFFENSE BY LSC AND MAY RESULT IN DISCIPLINE, UP TO AND INCLUDING TERMINATION. IF YOU BELIEVE YOU HAVE BEEN THE SUBJECT OF SUCH A REPORT, YOU SHOULD CONTACT THE VICE PRESIDENT OF HUMAN RESOURCES.

SIGNATURE: _____

DATE: _____