

ELI WHITNEY MUSEUM YOUTH PROTECTION POLICY

The Eli Whitney Museum (the “Museum”) is committed to providing a safe environment for minors placed in its care, apprenticeship, or employ. The Museum prides itself on its unique model of experiential and experimental learning, and considers it an absolute priority to create a safe and respectful environment in which to learn. The physical safety and emotional wellbeing of the children in the Museum community are our most important responsibility.

The purpose of this policy is to establish the Museum’s expectations for the protection of minors engaged in Museum programming and/or who are apprenticed or employed by the Museum and to define the parameters for reporting suspected abuse or neglect of the members of the Museum community who are minors. This includes but is not limited to the use of the reporting mechanisms described in this policy by minors to report conduct they may have experienced directly in connection with their Museum activities.

This policy does not supersede stricter standards set by the Museum or by state or federal law. The Compliance Committee of the Museum’s Board of Directors, together with the Executive Director, are responsible for the enforcement of this policy in all aspects of Museum programming. Information regarding the current members of the Compliance Committee may be found [on the Museum’s website](#), and the Committee may be collectively contacted by email at concerns@eliwhitney.org.

This policy will be reviewed at least annually, and may be updated from time-to-time.

DEFINITIONS

Minor:

Any person under eighteen years of age

Abuse:

The term “abuse” encompasses the following types of abuse:

- Physical Abuse:

Physical abuse occurs when a minor

- Has been inflicted with physical injury or injuries other than by accidental means,
- Is in a condition which is the result of maltreatment such as, but not limited to, malnutrition, sexual molestation, deprivation of necessities, emotional maltreatment or cruel punishment, and/or
- Has injuries at variance with the history given of them.

- Sexual Abuse/ Exploitation:

Any incident involving a minor’s non-accidental exposure to sexual behavior.

- Emotional Maltreatment – Abuse:

Any act, statement, or threat which has had, or is likely to have, an adverse impact on the minor and/or interfere with a minor's positive emotional development.

Neglect:

The term "neglect" encompasses the following types of neglect:

● Physical Neglect:

Physical neglect occurs when a minor

- Has been abandoned,
- Is being denied proper care and attention physically, educationally, emotionally, or morally
- Is being permitted to live under conditions, circumstances, or associations injurious to his wellbeing, or
- Has been abused.

● Medical Neglect:

The unreasonable delay, refusal or failure on the part of the person responsible for the minor's health, welfare, or care or the person entrusted with the minor's care to seek, obtain, and/or maintain those services for necessary medical, dental or mental health care when such person knows or should reasonably be expected to know, that such actions may have an adverse impact on the minor.

● Educational Neglect:

Educational neglect occurs when, by action or inaction, the parent or person having control of a school-aged minor who is not a high school graduate

- Fails to register the minor in school,
- Fails to allow the minor to attend school or receive home instruction in accordance with the requirements of Connecticut law,
- Fails to take appropriate steps to ensure regular attendance at school if the minor is registered.

● Emotional Neglect:

The denial of proper care and attention, or failure to respond, to a minor's affective needs by the person responsible for the minor's health, welfare or care; by a person given access to the minor; or by a person entrusted with the minor's care which has an adverse impact on the minor or seriously interferes with a minor's positive emotional development.

● Moral Neglect:

Exposing, allowing, or encouraging the minor to engage in illegal or reprehensible activities by the person responsible for the minor's health, welfare or care or person given access or person entrusted with the minor's care.

ZERO-TOLERANCE POLICY

The Museum has a zero-tolerance policy for any form of abuse or neglect perpetrated against a minor by its employees, apprentices, volunteers, or other adult members of the Museum community (collectively “Museum Representative”). Employees or apprentices found to be in violation of this policy will be subject to discipline up to and including termination, and may be subject to criminal and civil penalties. Volunteers or other adult members of the Museum community found to be in violation of this policy will be prohibited from further engagement with the Museum and its programs, and may be subject to criminal and civil penalties. Employees and apprentices who are sixteen and over and who fail to report violations of this policy as set forth herein will also be subject to discipline up to and including termination. Violations of this policy may also constitute violations of the Museum’s sexual harassment policy.

BEST PRACTICES FOR INTERACTING WITH MINORS

The following are best practices for adult Museum Representatives (including apprentices who are sixteen and over) interacting with and creating a safe environment for minors engaged in Museum programming, or employed or apprenticed by the Museum. While the applicability of each practice may vary based on the age of the minor and the nature of the minor’s relationship to the Museum, these practices are meant to provide a general guide for Museum Representatives’ interactions with minors.

Should any questions arise about the propriety of a particular interaction or relationship, please contact the Executive Director or Summer Camp Director for further clarification.

- Avoid one-on-one interactions with a minor as much as possible, as the situation allows. Should a one-on-one meeting with a Minor be necessary, it 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. In addition, a supervisor or another member of the EWM staff should be notified about the meeting at the same time as the interaction or as soon as is reasonably practicable thereafter;
- Avoid one-on-one physical contact with a minor as much as possible, as the situation allows;
- Avoid conduct that might lead a reasonable person to question your motivations and/or intentions;
- Do not make any kind of sexually suggestive comment or innuendo to a minor or in the presence of a minor;
- Avoid any physical contact that is unwanted or unwelcome or might be misinterpreted (e.g., back rubs, massages, tickling, horseplay, caressing, etc.);
- Do not photograph or otherwise record a minor without the prior written consent of the minor’s parent or guardian and never photograph or record a minor other than for official Museum business;
- Museum Representatives may share or repost posts from the Museum’s official social media account, but otherwise may not post photographs or recordings of minors on

- personal social media accounts. The Museum’s official social media account will not post photographs or recordings of minors without the prior written consent of the minor’s parent or guardian pursuant to the Museum’s Media Release Form;
- Use words with care: never berate, harass, intimidate, degrade, or belittle a minor;
 - Issue praise appropriately: avoid excessive praise or excessive criticism of any minor;
 - Keep unused rooms locked and secured;
 - When it is necessary to email a minor, such messages should be sent from a Museum email account only and should not include a copy to a personal account. Keep communications strictly professional and where possible include other Museum Representatives on the message. Text messaging or voice calls should be used only as a last resort when the topic is time-sensitive or email is not an available option, and only after communicating with the minor’s parent or guardian in advance to secure permission;
 - Adult Museum Representatives should not “friend” or otherwise engage with minors on social media platforms;
 - Never use alcohol or drugs, including tobacco products, around minors, other than responsible consumption of alcohol if over the age of 21 at a Museum event where alcohol is being served;
 - Never provide minors with alcohol or drugs, including tobacco products;
 - Should not give gifts outside the context of sanctioned Museum activities.
 - Should it be necessary to discipline a minor, the discipline must be constructive and reflect the Museum’s values. Corporal punishment is never permitted, and discipline may not involve isolation, humiliation, or ridicule;
 - Be aware of “red flags” that may be “grooming behavior” designed to break down barriers of resistance by someone who is intent on harming a minor. Avoid and be on the lookout for the following examples of potential grooming behavior:
 - Holding an older child in your lap;
 - Wrestling/horseplay;
 - Suggestive comments or innuendo;
 - Massages;
 - Tickling;
 - Repeatedly bumping or brushing up against a minor;
 - Inappropriate hugging; or
 - Excessive attention, whether positive or negative.

Museum Representatives are expected to be aware of the implications of power dynamics in all supervisory relationships, including with individuals over the age of 18, and consider the above-described best practices, as applicable, in all relationships in which they have supervisory authority. Employees should also refer to the Museum’s Harassment policy for additional expectations with regard to conduct toward coworkers.

REPORTING

The Museum's Executive Director and Summer Camp Director are statutory mandated reporters of child abuse and neglect. **While not all Museum Representatives are statutory mandated reporters, all Museum Representatives are required to monitor for signs of abuse or neglect and internally report any suspicion that a minor has been or is being abused or neglected, or otherwise mistreated, whether it be in a Museum program or elsewhere. For the purposes of these reporting obligations, Museum Representatives refers to employees, apprentices who are sixteen and over, volunteers, or other adult members of the Museum community. Museum Representatives share responsibility for ensuring the safety for minors engaged in Museum programming, and those employed or apprenticed by the Museum.**

Statutory Mandated Reporters. The Museum's Executive Director and Summer Camp Director are statutory mandated reporters of child abuse and neglect. This means that in the event the Museum Executive Director or Summer Camp Director become aware of actual or suspected abuse or neglect of a minor—whether by way of a formal report, informal discussions, or otherwise—they are legally obligated to make a report to the Connecticut Department of Children and Families.

Within twelve hours of learning of actual or suspected abuse of a minor, statutory mandated reporters will call DCF's 24-hour reporting line at 1-800-842-2288 to determine if the report meets Connecticut's statutory criteria for child abuse or neglect. Additionally, within forty-eight hours of making the oral report, the Executive Director and/or Summer Camp Director will submit a written report via DCF Form 136. Reports that meet the statutory criteria for abuse or neglect will be referred to a DCF case investigator for prompt and appropriate action.

Reporting By All Other Employees and Apprentices Sixteen and Over. Any suspicion of abuse or neglect or other violation of this Policy must be immediately reported through any of the following channels:

- Executive Director (Executive.Director@eliwhitney.org);
- Summer Camp Director (Camp.Director@eliwhitney.org);
- Director of Programming (Programming@eliwhitney.org); or
- Compliance Committee of the Board (Concerns@eliwhitney.org). *Note that the Executive Director and Summer Camp Director are ex officio members of the Compliance Committee.*

In no event will an employee or apprentice be required to report such suspicions to an individual believed to be implicated by the allegations of abuse or neglect and/or other violations of this Policy. In the event the issue involves the Executive Director, Summer Camp Director, and the Director of Programming or a member of the Compliance Committee, then the report may be made directly to the Secretary of the Board Of Directors if the Chair of the Board Of Directors is on the Compliance Committee.

When an employee or apprentice makes a report through any of the above channels, the Compliance Committee will be tasked with collecting all relevant information; provided,

however, that in the event that the Executive Director or Summer Camp Director or a member of the Compliance Committee is believed to be implicated by the allegations of abuse or neglect and/or other violations of this Policy, they will not be involved in the investigation, review, or resolution of the report.

In addition to the above channels, should an employee or apprentice who is not a mandated reporter wish to report suspected abuse or neglect directly to DCF, the employee or apprentice may do so by calling the 24-hour reporting line at 1-800-842-2288. In the event of a direct report to DCF without prior notice to the Museum, the employee or apprentice must notify the Executive Director immediately unless the allegations of abuse or neglect involve the Executive Director, in which case the employee must notify the Summer Camp Director immediately. All reports, DCF-136 forms, and staff statements submitted to DCF shall be documented and kept on file by the Museum.

No employee or apprentice will be terminated or otherwise retaliated against for making a good faith report of suspected child abuse or neglect or for participating in any investigation of suspected child abuse or neglect. Conversely, failure to report suspected abuse or neglect or other violations of this Policy (other than failure to self-disclose abuse or neglect) may result in discipline up to and including termination.

Reporting by Other Members of the Museum Community. All members of the Museum Community, including non-employees and apprentices under the age of sixteen, who are not required under this Policy to report are nonetheless strongly encouraged to report all forms of actual or suspected mistreatment, whether or not they rise to the level of abuse or neglect as defined in this Policy. This includes but is not limited to reporting by any apprentice regarding conduct that the apprentice experienced directly. Such reports may be made through any of the following channels:

- Executive Director (Executive.Director@eliwhitney.org);
- Summer Camp Director (Camp.Director@eliwhitney.org);
- Director of Programming (Programming@eliwhitney.org); or
- Compliance Committee of the Board (Concerns@eliwhitney.org). *Note that the Executive Director and Summer Camp Director are ex officio members of the Compliance Committee.*

The Museum will not tolerate retaliation against a volunteer or member of the Museum Community who has made a good faith report of suspected child abuse or neglect or other violation of this Policy, or who has participated in any investigation of suspected child abuse or neglect. Conversely, volunteers or other adult members of the Museum Community who fail to report suspected abuse or neglect or other violations of this Policy may be prohibited from further engagement with the Museum and its programs.

EMPLOYEE, APPRENTICE, and VOLUNTEER SCREENING

All employees, apprentices over the age of 18, and volunteers will be required to submit to a background check in compliance with the requirements of the Office of Early Childhood.

TRAINING

All employees, apprentices, and volunteers who have direct contact with minors will be required to review and sign this policy on an annual basis as appropriate for age and responsibility.

Employees will also be required to complete DCF's Mandated Reporter Training for Community Providers, https://www.proprofs.com/training/course/?title=communitymrt2022_6282bfc17cb23 annually.

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