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Youth Program Participant Protection Policy

Purpose

The National Federation of the Blind (NFB) understands the importance of protecting all individuals especially minors that participate in programs controlled by the national organization. This includes any program directly managed by a Federation employee or by a Federation leader with authorization to commit resources. These programs may take place at the NFB Jernigan Institute or other locations utilized by the program. This policy affirms our commitment to taking the necessary steps to provide a safe and secure environment for program participants.

Definitions

Youth program participants (participants)—Minors 17 years of age or younger, and other vulnerable individuals (as defined by relevant laws and regulations) who participate in our programs and events.

Program workers (workers)—Volunteers (members and non-members), employees, and contractors who are directed by the program coordinator to interact with our youth program participants.

Program coordinator—The NFB staff lead or designated Federation leader who is responsible for the oversight and coordination of program workers and program-related activities.

Screening Program Workers

Background Checks

All program workers will be screened in accordance with this policy prior to being eligible to serve. Screening will include at least the following:

An internal conflict review will be conducted by designated NFB staff to discover circumstances that would exclude a potential program worker from the program due to investigations or violations related to the organization’s code of conduct.

Criminal background checks will be conducted for all potential program workers after they’ve completed an

application. The background checks will comply with applicable federal and state regulations governing programs. Applicants will not be considered for positions when checks show evidence of convictions for an offense involving children, violence, or any other conduct contrary to the mission of the NFB.

The NFB will use a well-known reputable third party service to conduct a screening and criminal background check that allows the performance of monthly updates to the extent permitted by law. The information obtained will be stored on a secured server, and only made accessible to authorized NFB personnel.

Personal Interview

A personal interview will be conducted with the applicant by an NFB staff member or authorized designee to discuss the position and the applicant's talents, qualifications, and abilities. Multiple and/or group interviews may be conducted as appropriate. Individuals who have previously passed NFB's screening process may not be required by NFB to be personally interviewed again unless they have not worked in an NFB program for three or more years.

References

All applicants must provide at least three (3) references. References may be personal or professional and presented in written form or by providing phone and email contact information. All references will be confirmed by appropriate program workers and documented in the applicant's file. At least one reference will be from a personal contact if available.

Training and Education

In addition to specific training related to the particular goals and objectives of the program, all program workers will receive an orientation training that includes:

- Review of NFB Code of Conduct
- Review of NFB Sexual Abuse and Molestation (SAM) policy
- Anti-discrimination
- How to recognize consent problems and create appropriate interventions
- Mandatory reporting responsibilities
- Emergency procedures

Program worker trainings and orientations will be updated and refreshed each year.

The NFB will offer the training and orientation through workshops, programs, and the use of Braille, print, and/or audiovisual resources.

Supervision

Supervision of youth program participants, programs, facilities, and program workers will be designed to protect program participants and program workers at all times. Practices to ensure a safe and caring environment will include:

A minimum of two program workers should be assigned to each program and program location.

Program workers will never be alone with an individual program participant where they are not observable by others.

Classroom doors should remain open unless there is a window in the door or a side window beside it. Doors should never be locked while persons are inside the room unless there are emergent safety needs or imminently threatening health demands.

There will be access to a telephone at all program locations during operating hours.

Program participants will never be left unsupervised.

Program workers will never release program participants to anyone other than the authorized parent(s), guardian(s), or an individual authorized by parents in writing or verified by phone.

Program workers will utilize constructive methods for maintaining group control and managing program participants' behavior.

Program workers will appear and behave in a manner consistent with the mission and values of NFB at all times; including electronic, written, and verbal communications.

Parent/Guardian Communications

The NFB will inform parents of our youth program participant protection strategies. All parents will be provided with a link to the current NFB Code of Conduct and a link to the current NFB Sexual Abuse and Molestation (SAM) policy.

Parents will be introduced to the program workers and will receive regular communication about the program's content and schedules and feedback regarding their child's participation in the program, including behavior and general health.

Parents or guardians will be allowed to observe the program as deemed appropriate by the program coordinator without disruption to the program.

Reporting Requirements

For purposes of this policy, “child abuse” is any action (or lack of action) that endangers or harms a child’s physical, psychological, or emotional health and development. All NFB program workers are recognized as mandated reporters. The NFB will follow current regulations and guidelines for the reporting of abuse.

Program workers will follow an internal chain of command for the reporting of abuse and may report directly to local authorities if appropriate.

If an incident of abuse or neglect is alleged to have occurred at or during NFB programs or activities, the following procedure shall be followed:

- The parent or guardian of the child will be notified.
- The appropriate authorities will be notified; consistent with local, state, and/or federal regulations.
- The NFB will cooperate with any investigation of the incident by state or local authorities. In the event there is no investigation of the incident by state or local authorities, a management team will be formed to investigate the circumstances of the incident.
- The alleged perpetrator of the abuse or misconduct will immediately be placed on leave from NFB pending an investigation, and consequences will be administered consistent with the Federation’s policies and practices related to code of conduct.
- An incident report will be completed.
- As deemed appropriate by the program coordinator and NFB Board of Directors, other program workers, participants, and families of participants will be notified of the incident and resulting actions taken.

Monitoring

This policy will be reviewed and updated as needed by the National Federation of the Blind Board of Directors or its designee on an annual basis.

Adopted on June 10, 2021, by the National Federation of the Blind Board of Directors.



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National Federation of the Blind
200 East Wells Street at Jernigan Place
Baltimore, Maryland 21230

Phone 410-659-9314 (tel:+14106599314)

Email nfb@nfb.org (mailto:nfb@nfb.org)



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