



Guidelines for Identifying and Reporting Child Abuse & Neglect



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A. Purpose

Headfirst Companies are committed to taking meaningful action to protect the safety and wellbeing of all campers through policies and practices which not only comply with applicable federal, state, and local law, but also meet or exceed industry standards. Our Guidelines for Reporting Child Abuse and Neglect establish organizational protocol and procedures for protecting against, identifying, and responding to suspected incidents of child abuse and neglect. The aim of the Guidelines is to help foster an understanding of child abuse factors, signs, and laws which may help prevent abuse or neglect, and to ensure all employees, agents, independent contractors, and vendors of Headfirst Companies (our “Staff”) are as prepared as possible to recognize abuse and potential abuse, and know how to respond to any incident, allegation, or suspicion that may arise.

B. Preventing & Identifying Abuse

All Headfirst Staff are expected to remain constantly vigilant against any activities or conditions which might threaten the safety of campers and – irrespective of whether there is a legal obligation – to take action if they suspect that a child with whom they are in contact through a program operated by Headfirst Companies is being or has been abused. All Headfirst Staff who will be working on-site over the summer are required to complete training on preventing and recognizing abuse prior to arriving at camp. All Staff should also be sure to read and keep a copy of these Guidelines as an additional resource on common indicators of child abuse and neglect, and on how and where to report suspected abuse. Additional information on Headfirst Companies policies and procedures is available by contacting our Human Resources Departments at hr@headfirst.com.

<i>Recognizing Child Abuse & Neglect</i>	
Source: Child Welfare Information Gateway	
Child Welfare Information Gateway’s web page on child abuse and neglect provides additional information on identifying abuse, risk and protective factors, statistics, and more: https://www.childwelfare.gov/can/	
<i>Signs of Physical Abuse</i>	
Consider the possibility of physical abuse when the child :	<ul style="list-style-type: none"> • Has unexplained burns, bites, bruises, broken bones, or black eyes • Has fading bruises or other marks noticeable after an absence from school • Seems frightened of the parents and protests or cries when it is time to go home • Shrinks at the approach of adults • Reports injury by a parent or another adult caregiver • Abuses animals or pets
Consider the possibility of physical abuse when the parent or other adult caregiver :	<ul style="list-style-type: none"> • Offers conflicting, unconvincing, or no explanation for the child’s injury, or provides an explanation that is not consistent with the injury • Describes the child as “evil” or in some other very negative way

	<ul style="list-style-type: none"> • Uses harsh physical discipline with the child • Has a history of abuse as a child • Has a history of abusing animals or pets
<i>Signs of Neglect</i>	
Consider the possibility of neglect when the child :	<ul style="list-style-type: none"> • Is frequently absent from school • Begs or steals food or money • Lacks needed medical or dental care, immunizations, or glasses • Is consistently dirty and has severe body odor • Lacks sufficient clothing for the weather • Abuses alcohol or other drugs • States that there is no one at home to provide care
Consider the possibility of neglect when the parent or other adult caregiver :	<ul style="list-style-type: none"> • Appears to be indifferent to the child • Seems apathetic or depressed • Behaves irrationally or in a bizarre manner • Is abusing alcohol or other drugs
<i>Signs of Sexual Abuse</i>	
Consider the possibility of sexual abuse when the child :	<ul style="list-style-type: none"> • Has difficulty walking or sitting • Suddenly refuses to change for gym or to participate in physical activities • Reports nightmares or bedwetting • Experiences a sudden change in appetite • Demonstrates bizarre, sophisticated, or unusual sexual knowledge or behavior • Becomes pregnant or contracts a venereal disease, particularly if under age 14 • Runs away • Reports sexual abuse by a parent or another adult caregiver • Attaches very quickly to strangers or new adults in their environment
Consider the possibility of sexual abuse when the parent or other adult caregiver :	<ul style="list-style-type: none"> • Is unduly protective of the child or severely limits the child's contact with other children, especially of the opposite sex • Is secretive and isolated • Is jealous or controlling with family members
<i>Signs of Emotional Abuse</i>	
Consider the possibility of emotional abuse when the child :	<ul style="list-style-type: none"> • Shows extremes in behavior, such as overly compliant or demanding behavior, extreme passivity, or aggression • Is either inappropriately adult (parenting other children, for example) or inappropriately infantile (frequently rocking or head-banging, for example) • Is delayed in physical or emotional development • Has attempted suicide • Reports a lack of attachment to the parent
Consider the possibility of emotional abuse when the parent or other adult caregiver :	<ul style="list-style-type: none"> • Constantly blames, belittles, or berates the child



	<ul style="list-style-type: none"> • Is unconcerned about the child and refuses to consider offers of help for the child’s problems • Overtly rejects the child
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C. Responding to a Suspicion of Abuse or Neglect

If a member of the Headfirst Staff has knowledge of or reason to believe that child abuse or neglect has occurred, he or she must report their suspicions as soon as possible, and in all cases within 24 hours, to the appropriate camp program’s Site Leader/Site Director. The Site Leader/Site Director will document their belief or knowledge by completing the Suspected Child Abuse and Neglect (SCAN) Report and following the instructions on the report to communicate with the designated HQ intake manager, the VP of Talent & Legal Counsel Katherine Bernert, at 202-625-1921 x1220 or at kbernert@headfirst.com, who will assist in facilitating any appropriate report to Child Protective Services or local authorities. If for any reason the reporter is uncomfortable discussing the matter with, or is not able to reach, the Site Leader/Site Director, it is the reporter’s duty to communicate their concern directly to Ms. Bernert. If for any reason the reporter is uncomfortable discussing the matter with, or is not able to reach, Ms. Bernert, they are directed to report the matter to the President of the Company, Brendan Sullivan, at 202-625-1921 x1020 or at bsullivan@headfirst.com.

A circumstance may arise where there is substantial ambiguity as to whether a sign of *potential* abuse is in fact a sign of *actual* abuse (for instance, if a child who has otherwise not exhibited any sign of abuse comes to camp with a bruise they cannot easily explain). Should this situation occur, the Site Leader or Program Coordinator will document the potential sign of abuse and immediately notify Headfirst Companies President and/or the Director of Talent and Legal Affairs, following the above procedure if/when they have knowledge of or a reasonable belief that child abuse or neglect has occurred.

All individuals involved in responding to a suspicion of child abuse or neglect must adhere to all rules related to confidentiality and privacy set forth by state law and Headfirst policy.

Where the report of abuse or neglect involves a member of Headfirst Staff, the individual in question will not be permitted to work with campers while the investigation into the incident is being completed.

To protect the wellbeing, security, and privacy of all involved, the reporter should not confront a suspected abuser or accuse them of child abuse, nor should they discuss suspicions or allegations with other staff members except as set forth above.

<i>Child Abuse & Neglect Reporting Information by State</i>	
Source: Child Welfare Information Gateway	
Each State designates specific agencies to receive and investigate reports of suspected child abuse and neglect. Typically, this responsibility is carried out by Child Protective Services (CPS) within a Department of Social Services, Department of Human Resources, or Division of Family and Children Services. In some states, police departments may also receive reports of child abuse or neglect. For more information or assistance with reporting, please call Child Help USA ®, 800-4-A-CHILD (800-422-4453), or the local CPS agency. If a child is in immediate danger, call 911 as well as the appropriate services agency.	
<i>District of Columbia</i>	
Child & Family Services Agency	(202) 671-SAFE



Georgia	
Division of Family & Children Services	(855) 422-4453
Illinois	
Department of Children & Family Services	(800) 252-2873
Maryland Department of Social Services (By Relevant County)	
Calvert County	200 Duke Street Prince Frederick, MD 20678 (443) 550-6969 (24 hours) (410) 286-2100 (after hours)
Charles County	200 Kent Avenue La Plata, MD 20646 (301) 392-6739 (301) 934-2222 (after hours)
Frederick County	100 East All Saints Street Frederick, MD 21701 (301) 600-2464 (301) 600-2100 (after hours, police dept.)
Montgomery County	1301 Piccard Drive Rockville, MD 20850 (240) 777-4417 (24 hours)
Prince George's County	805 Brightseat Road Landover, MD 20785 (301) 909-2450 (301) 699-8605 (after hours)
Massachusetts	
Department of Health & Human Services	(800) 792-5200
New Jersey	
Division of Child Protection & Permanency State Central Registry	(877) 652-2873
New York	
Office of Children & Family Services	(800) 342-3720
Pennsylvania	
Department of Human Services	(800) 932-0313
Virginia Department of Social Services (By Relevant County)	
Arlington County	3033 Wilson Boulevard Arlington, VA 22201 (703) 228-1550
Fairfax County	12011 Government Ctr. Parkway; Suite 200B-3 Fairfax, VA 22035 (703) 324-7500
Loudoun County	102 Heritage Way, NE; Suite 200 Leesburg, VA 20176 (703) 777-0353
Prince William County	7987 Ashton Avenue; Suite 200 Manassas, VA 20109 (703) 792-7500
Virginia Department of Social Services Hotline	(800) 552-7096



D. Taking Action Following a Report

If there is reason to believe the child would be in imminent danger when released back into the custody of their parent/guardian, the child protective services authorities should be consulted on whether there are any options for immediate action, and if there is reason to believe the child or anyone else is in immediate danger while on site at camp, the Site Leader/Site Director should follow Headfirst Emergency Action Plan protocol to contact the local authorities. All arrangements for placement of a child away from their parent or guardian can only be made by law enforcement and/or child protective services; depending on the seriousness, such instruction from local law enforcement or child protective services may include but not be limited to, medical attention, counseling services, removal or protective placement, contacting relatives, etc.

If a Headfirst employee is named as an alleged offender in a SCAN report, they will immediately be removed from contact with or control over all children. Such removal can be addressed in one of two options, Re-assignment or Administrative Leave. An employee/alleged offender can be re-assigned to another location away from contact with children for the duration of the investigation where possible, however where reassignment is not possible, the employee/alleged offender can be placed on Administrative Leave until the appropriate clearance is established. A non-employee such as a contractor, volunteer, consultant, or service provider who is named as the alleged offender will immediately be removed from and remain away from contact with or control over all children until the incident is resolved. When an employee/alleged offender is placed on Administrative Leave or a non-employee is removed from site, they will be advised that they must be available at all times for contact by local law enforcement or child protection services as part of the post report process, and as such, they must provide contact information to Headfirst.

An employee against whom an allegation of child abuse has been raised must be notified in writing at the time a SCAN report is filed of the allegation and the resulting actions. The notification should include the following: (a) Date of the SCAN Report, (b) Type of abuse alleged, and (c) Brief summary of the allegation. The employee will sign the notification document acknowledging he/she was informed of the report's filing. Non-employees who are named alleged offenders must also be notified in writing of the allegation and meet the same requirements of above.