

# **Staff Policy Handbook**

**The Green Wall Group LLC d/b/a Medley Music Access & Inclusion Effective Date:**

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## **About This Handbook**

**This handbook contains the policies and procedures that apply to all employees, contractors, and volunteers of Medley Music Access & Inclusion. Read it in full and sign the Policy Acknowledgment Form before beginning any work with Medley.**

Medley provides professional development for music educators and adaptive music instruction for students, including minors and individuals with disabilities. These policies exist to protect the people we serve and to maintain the professional standards our work requires.

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# **Part 1: Abuse Prevention**

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## **1.1 Zero-Tolerance Statement**

Medley maintains a zero-tolerance policy toward any form of abuse, neglect, molestation, or exploitation of any client, student, or program participant. Any staff member who engages in, conceals, or fails to report such conduct will be subject to immediate termination and referral to law enforcement.

## **1.2 Definitions**

**Abuse** includes but is not limited to:

- **Physical abuse:** Any non-accidental physical injury or act that creates a substantial risk of physical injury
- **Sexual abuse:** Any sexual contact or interaction with a minor or vulnerable individual, including but not limited to inappropriate touching, exposure, exploitation, or solicitation
- **Emotional abuse:** A pattern of behavior that impairs a person's emotional development or sense of self-worth, including constant criticism, threats, intimidation, or rejection
- **Neglect:** Failure to provide adequate supervision, safety, or care when responsible for a minor or vulnerable individual

## **1.3 Appropriate Behaviors**

- Maintaining professional boundaries at all times
- Using positive, respectful language with all students and participants
- Providing instruction in observable, accessible settings
- Communicating with families through official channels
- Redirecting behavior using positive, non-physical techniques
- Using professional judgment around physical contact to support student participation (see Section 2.3 for full guidelines)

## **1.4 Prohibited Behaviors**

- Being alone with a minor in a closed, unobservable space
- Any form of physical discipline or punishment
- Any sexual, romantic, or intimate contact or communication with a minor or vulnerable individual
- Sharing personal contact information (personal phone, social media) with minor students
- Transporting a minor alone without written parental/guardian consent
- Giving personal gifts to individual students
- Photographing or recording students without written consent from parent/guardian
- Using alcohol, tobacco, or controlled substances in the presence of students

- Making demeaning, degrading, or sexually suggestive comments
- Grooming behaviors, including: building secretive relationships with students (“this is our special thing”), excessive personal attention or favoritism, sharing personal problems with students, testing boundaries incrementally, or any attempt to isolate a student from peers or other adults

## **1.5 Supervision Requirements**

- When providing direct instruction to minors, at least one other adult (Medley staff or host-site staff) must be present or the instruction must take place in an observable setting (open door, windowed room, or visible to other adults).
- No employee or volunteer may be alone in a closed, unobservable space with a minor.
- When Medley operates within a host school or facility, Medley staff will comply with the host site’s supervision policies in addition to this policy. Where the host site’s policies are stricter than Medley’s, the stricter policy applies.
- If a suitable observable space is not available at a host site, the staff member must request a different location or arrange for another adult to be present before beginning a session.

## **1.6 Transportation**

Staff may not transport students in personal vehicles under any circumstances. All Medley services occur at host school facilities. Students remain under school custody before and after Medley instruction.

## **1.7 Investigation and Law Enforcement Cooperation**

Medley will promptly investigate all reports of suspected abuse. If at any point during an investigation there is reason to believe abuse has occurred, Medley will:

1. Immediately report to the Massachusetts Department of Children and Families (DCF) via 51A filing
  2. Cooperate fully with law enforcement and DCF investigations
  3. Not interfere with, obstruct, or attempt to influence any external investigation
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## Part 2: Code of Conduct

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### 2.1 Professional Boundaries

All staff will:

- Treat every student, participant, and colleague with dignity and respect
- Maintain clear professional boundaries in all interactions
- Use identity-first, respectful language when discussing disability (e.g., “disabled students,” “autistic students,” “nonspeaking students”)
- Recognize that our role is to serve learners, not to fix them
- Defer to families and caregivers on matters of personal care, medical needs, and behavioral support outside the scope of music instruction

### 2.2 Communication

- All communication with families of minor students must go through official Medley channels (organizational email, official phone number)
- Staff may not exchange personal phone numbers, social media handles, or private messaging information with minor students
- Staff may not communicate with minor students through any private or personal channel
- Communication with adult PD participants may use standard professional channels

### 2.3 Physical Contact and Professional Support

Medley provides adaptive music instruction to students with physical, sensory, and developmental disabilities. In this context, instructional and therapeutic physical contact is a necessary and professionally recognized component of effective instruction.

All physical contact is provided by credentialed professionals — including a board-certified music therapist (MT-BC) and music educators with specialized training in autism and inclusive practice — and is goal-directed, task-specific, and guided by established standards of professional practice.

#### Permitted Contact

Physical contact is limited to actions that directly support a student’s participation, learning, or safety. Permitted forms of contact include:

- **Instrumental assistance:** Hand-over-hand or hand-under-hand guidance to facilitate instrument playing (e.g., mallet grip, keyboard fingering, strumming)
- **Postural and positioning support:** Physical assistance to help a student sit, hold an instrument, or maintain a stable position for safe participation
- **Motor prompting:** Brief, targeted physical prompts to guide a student’s movement during a structured music activity

- **Safety stabilization:** Momentary support to prevent injury during active movement or transitions

All staff-initiated contact is directly related to an instructional objective, limited to the duration necessary for the task, and consistent with the practitioner's training and scope of practice.

### **Student-Initiated Contact**

Students with developmental, sensory, and physical disabilities frequently initiate physical contact with trusted adults. This is a well-documented characteristic of this population and an expected part of the therapeutic and educational relationship. Students may seek physical closeness, lean against an instructor, reach for or grasp an instructor's hands or body, or sit in close physical proximity during instruction.

When a student initiates contact, staff respond with professional judgment:

- Staff do not reject or abruptly remove a student who seeks physical closeness, as this can be harmful to the student's sense of safety and trust
- Staff use their clinical and educational training to determine the appropriate response — which may include allowing the contact, gently redirecting, or using the moment as an instructional opportunity
- Patterns of student-initiated contact are communicated to parents/guardians and the school team as part of ongoing collaboration about the student's needs and behaviors
- All sessions, including those where student-initiated contact occurs, take place in observable environments

### **Safeguards**

- Staff narrate their actions during physical contact ("I'm going to help guide your hand to the drum") and monitor for the student's verbal and non-verbal responses throughout
- Staff immediately cease contact upon any sign of discomfort, distress, or refusal
- Physical support strategies are discussed with parents/guardians and the student's school team in advance when appropriate, and aligned with the student's existing educational or therapeutic plans (IEP, 504, etc.)
- All instruction involving physical contact takes place in observable environments (open doors, windowed rooms, or other adults present)

### **Scope Limitations**

Medley staff provide music instruction only. Staff do not perform:

- Personal care or activities of daily living (restroom assistance, feeding, hygiene, clothing adjustment)
- Medical or nursing interventions
- Physical interventions beyond the scope of music instruction

These are the responsibility of school personnel or the student's designated support team.

### **Prohibited**

- Physical discipline or punitive contact of any kind
- Physical restraint (staff defer to designated school or crisis intervention personnel)

- Any sexual, romantic, or exploitative contact
- Contact unrelated to an instructional or safety purpose
- Continuation of contact when a student communicates refusal or distress through any means

## **2.4 Digital and Social Media**

- Staff may not follow, friend, or connect with minor students on personal social media accounts
- Staff may not privately message minor students on any platform
- Photographs or video of students may only be taken with prior written consent from the parent/guardian and must be used only for authorized Medley purposes
- Staff may not post images of students to personal social media accounts

## **2.5 Gifts and Favoritism**

- Staff may not give personal gifts to individual students
- Organizational items (e.g., certificates, group treats for a class) are permitted
- Staff must avoid any appearance of favoritism toward individual students

## **2.6 Substance Use**

- Use of alcohol, tobacco, cannabis, or any controlled substance is prohibited during any Medley activity or while supervising students
- Staff may not be under the influence of any intoxicating substance during Medley activities

## **2.7 Consequences**

Violations of this Code of Conduct will be addressed based on severity and may include:

- Verbal or written warning
- Suspension from Medley activities pending investigation
- Immediate termination
- Referral to law enforcement

Any conduct involving suspected abuse of a minor will result in immediate suspension pending investigation and mandatory reporting to DCF.

## **2.8 Host School Compliance**

When working at host schools or facilities, Medley staff must:

- Comply with all host site safety, security, and conduct policies
- Follow the host school's visitor and contractor procedures (sign-in, badge requirements, etc.)
- Coordinate with host site staff on supervision and emergency procedures
- Report any incidents to both the host site administration and the Medley Director

## **Part 3: Training**

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### **3.1 Initial Training**

All new staff must complete the following before any contact with students:

- Full review of this Staff Policy Handbook
- Mandated reporter training (available free through Massachusetts DCF)
- Abuse prevention training covering: recognizing signs of abuse, grooming behaviors, appropriate boundaries, and reporting procedures
- Orientation to Medley's mission, values, and approach to inclusive music education

Training must be completed and documented before the staff member's first session with students.

There are no exceptions.

### **3.2 Annual Refresher Training**

All active staff must complete an annual refresher covering:

- Review of this handbook (including any updates)
- Mandated reporter obligations
- Abuse prevention and boundary awareness
- Any new policies or procedures

### **3.3 Documentation**

All training is documented with:

- Date and topics covered
  - Staff member's signature confirming completion
  - Retained in the staff member's personnel file for the duration of association plus 7 years
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## Part 4: Background Check Policy

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### 4.1 Required Checks

Prior to beginning any work that involves contact with minors or vulnerable individuals, the following checks must be completed:

Check	Required
CORI (Criminal Offender Record Information) — Massachusetts	Yes
SORI (Sex Offender Registry Information) — Massachusetts	Yes
National criminal background check (name-based)	Yes
National Sex Offender Public Website (NSOPW) search	Yes
Fingerprint-based national criminal history check (FBI/CHSB)	Yes, for all staff entering school facilities
Verification of identity (government-issued photo ID)	Yes
Professional license/certification verification (where applicable)	Yes

If an individual has resided outside Massachusetts in the past 5 years, an out-of-state criminal records check is also required.

Staff who hold current, valid fingerprint-based clearances through another Massachusetts employer (e.g., a school district) may provide documentation of that clearance. The Director will verify the clearance is current and will run Medley's own CORI/SORI checks in addition. The Green Wall Group LLC is registered as a CORI requester with the Massachusetts Criminal History Systems Board (CHSB).

### 4.2 Timing

- All required checks must be completed and reviewed **before** the individual has any contact with minors or vulnerable individuals
- No individual may begin working with students until background check results have been received and reviewed by the Director
- There are no exceptions to this requirement

#### **4.3 Renewal**

- Background checks (CORI and SORI at minimum) will be renewed **every 3 years** for all active employees, contractors, and regular volunteers
- If Medley becomes aware of a new criminal charge or conviction for any active staff member, an updated check will be conducted immediately

#### **4.4 Review and Disqualification**

The following result in automatic disqualification:

- Any conviction for a crime against a child or vulnerable person
- Any conviction for a sexual offense
- Registration on any sex offender registry
- Any pending charges for the above

Other criminal history will be reviewed on a case-by-case basis, considering the nature and gravity of the offense, time elapsed, and the nature of the position.

#### **4.5 Applicant Rights**

- All applicants will be informed in writing that a background check is required
- Applicants will provide written consent for all checks
- If an adverse decision is made based on results, the applicant will be notified in writing and given an opportunity to dispute the accuracy, consistent with Massachusetts CORI law

#### **4.6 Confidentiality**

- Background check results are confidential, stored securely and separately from general personnel files
- Access is limited to the Director
- Results are retained for the duration of association plus 7 years after separation

#### **4.7 Owner Status**

Philip Silva (Owner/Business Manager) and Jessica Corwin (Owner/Director) are excluded from workers' compensation and payroll as LLC owners. However:

- **Jessica Corwin** provides direct adaptive music instruction to minors and is fully covered under all liability and abuse & molestation insurance. She is subject to all policies in this handbook and maintains current CORI/fingerprint clearance through her position as a Massachusetts public school teacher, in addition to Medley's own checks.
- **Philip Silva** serves as Business Manager with no direct student contact. He is subject to the Code of Conduct and reporting obligations in this handbook but does not require the same level of background screening as client-facing staff.

## **Part 5: Incident Reporting Procedure**

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### **5.1 Mandated Reporter Designation**

All Medley staff who work with minors or vulnerable individuals are designated as **mandated reporters** under this policy. Massachusetts law specifically designates teachers, counselors, and certain other professionals as mandated reporters (M.G.L. c. 119, Section 51A). Medley extends this designation to all staff as a matter of organizational policy.

### **5.2 What Must Be Reported**

#### **Suspected Abuse or Neglect of a Minor (51A)**

Any staff member who has **reasonable cause to believe** that a child under 18 is suffering from abuse or neglect must report. This includes:

- Physical injury not consistent with an accident
- Sexual abuse or exploitation
- Emotional abuse or chronic neglect
- Disclosure by a child that they are being abused or neglected
- Observations of unexplained injuries, fear of a caregiver, or other warning signs

**You do not need to be certain.** Reasonable suspicion is sufficient and required.

#### **Other Reportable Incidents**

- Any injury to a student or participant during a Medley activity
- Any allegation of inappropriate conduct by a staff member
- Any safety hazard or near-miss during a Medley activity
- Any violation of this handbook

### **5.3 Reporting Suspected Abuse of a Minor (51A)**

#### **Step 1: Immediately call DCF**

Massachusetts Department of Children and Families Child Abuse Hotline: **1-800-792-5200** (24 hours, 7 days)

Do not wait. Do not investigate on your own first.

#### **Step 2: Notify the Director**

Immediately after contacting DCF, notify the Director (Jessica Corwin) by phone or in person. If the allegation involves the Director, notify the Business Manager (Philip Silva) instead.

#### **Step 3: Written report within 48 hours**

File a written 51A report with DCF including: name, age, and address of the child; name and address of parent/guardian; nature and extent of suspected abuse or neglect; how you became aware; any actions taken; and any other relevant information. The Director will assist with this process.

#### **Step 4: Cooperate with investigation**

Cooperate fully with DCF and law enforcement. Do not contact the alleged perpetrator or the child's family to discuss the report. Do not discuss the report with other staff except as necessary for the investigation.

### **5.4 Reporting Other Incidents**

1. Address any immediate safety concerns
2. Notify the Director verbally as soon as possible, and in writing within 24 hours
3. Document: date, time, location, individuals involved, witnesses, description, actions taken, follow-up needed

### **5.5 Response to Allegations Against Staff**

1. The staff member is **immediately suspended** from all student contact pending investigation
2. If a minor is involved, a 51A report is filed with DCF
3. The Director conducts an internal review
4. Actions may include reinstatement, additional training, termination, or referral to law enforcement
5. No student contact is permitted until the investigation is complete

### **5.6 Protections**

- **Good faith reporters are protected.** Massachusetts law shields mandated reporters from liability for reports made in good faith, even if later determined to be unfounded
- **Retaliation is prohibited.** Medley will not retaliate against any individual who makes a good-faith report
- **Failure to report is a crime.** Under Massachusetts law, mandated reporters who fail to report suspected abuse may face criminal penalties

### **5.7 Record Retention**

All incident reports, 51A filings, and related documentation are retained **permanently** in a secure, confidential file. Access is limited to the Director and, when necessary, legal counsel or law enforcement.

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## **Part 6: Photo and Media Policy**

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### **6.1 Consent Requirements**

**Adults (18+):** Written consent must be obtained before their likeness or words are used in any Medley materials. Consent must specify the types of use authorized. Individuals may revoke consent at any time in writing.

**Minors (under 18):** Written consent must be obtained from the parent or legal guardian. If the minor is old enough to understand (generally age 12+), their assent should also be obtained.

**Individuals under guardianship:** Consent must be obtained from the legal guardian.

### **6.2 Standards**

- Medley will use respectful, identity-first language and framing in all media featuring disabled individuals
- Images and descriptions will center the individual's participation and musicianship, never their disability as a subject of inspiration or pity
- No image or recording will be used in a way that is demeaning, exploitative, or misrepresentative
- No image or recording will be sold to third parties

### **6.3 Staff Responsibilities**

- Staff may not photograph or record students on personal devices
- All photographs and recordings must be taken on Medley-authorized devices or by an authorized photographer
- Staff may not post images of students to personal social media accounts
- Staff must confirm that a signed release is on file before submitting photos for any Medley use

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**This handbook will be reviewed annually and updated as needed.**

**All staff must sign a Policy Acknowledgment Form confirming they have read and understood this handbook.**