Massachusetts Department of Correction **POLICY**	Effective Date 7/24/2026 Annual Review Date 10/7/2026	Responsible Division Deputy Commissioner, Human Resources
Policy Name 103 DOC 225 PROFESSIONAL BOUNDARIES	M.G.L. Reference: M.G.L. c. 268 § 21A DOC Policy Reference: 103 DOC 224; 103 DOC 519; 103 DOC 522 ACA/PREA Standards:	
Attachments Yes ☐ No ☒ / Library Yes ☐ No ☒ Public Access Yes ☒ No ☐	Applicability: All Department Employees; All Contractors; All Volunteers Location: Department's Central Policy File Each Institution's Policy Files Department's Personnel Policy Manual	

PURPOSE:
To establish a Department of Correction (Department) policy regarding establishment and maintenance of professional boundaries between employees, contractors, and volunteers, with incarcerated and civilly committed individuals, and the family members and friends of incarcerated and civilly committed individual; to discourage and prevent violations of professional boundaries with incarcerated and civilly committed individuals; to identify risk factors and warning signs of possible professional boundary violations by employees, contractors, and volunteers; and to establish uniform procedures for identifying, reporting, investigating, and resolving incidents of professional boundary violations with incarcerated and civilly committed individuals in the Department.

RESPONSIBLE STAFF FOR IMPLEMENTATION AND MONITORING OF POLICY:
Deputy Commissioner, Human Resources
Assistant Deputy Commissioners
Director, Division of Staff Development
Chief, Professional Standards Unit
Executive Director of Human Resources
Superintendents/Division Heads

CANCELLATION:
103 DOC 225 cancels all previous Department policy statements, bulletins, directives, orders, notices, rules or regulations regarding professional boundaries which are inconsistent.

SEVERABILITY CLAUSE:
If any part of 103 DOC 225, is for any reason, held to be unconstitutional, contrary to statute, in excess of the authority of the Commissioner, or otherwise inoperative such decision shall not affect any other part of this policy.

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225.01 POLICY STATEMENT

It is the Department's policy to ensure that all employees, contractors, and volunteers maintain professional boundaries with incarcerated and civilly committed individuals. Any act by an employee, contractor, or volunteer that violates professional boundaries is prohibited. All allegations and incidents involving the violations of professional boundaries shall be reported and fully investigated and may result in action ranging from discipline, including termination, to criminal prosecution. As part of its continuous effort to prevent violations of professional boundaries, the Department is committed to providing all staff with training regarding this policy.

225.02 DEFINITIONS

Intimacy: Any behavior between individuals which does not rise to the level of sexual abuse or harassment, but which is close, personal and creates/maintains an emotional and/or sexual connection, including, but not limited to,touching parts of the body not included under the definition of sexual abuse, sending/receiving personal letters/cards/gifts, or engaging in phone calls. Intimacy and intimate relationships between staff members and incarcerated or civilly committed individuals are expressly prohibited, as they are a violation of professional boundaries.

Professional Boundaries: Relationships and interpersonal interactions by employees, contractors, and volunteers with incarcerated and civilly committed individuals and the family members and friends of incarcerated and civilly committed individuals that are impartial, limited to fulfill official duties, and that are within the boundaries of applicable federal and state laws, regulations, and other Department policies. Such relationships and interpersonal interactions are those that a person would willingly have made known to a superior and any official authorized to inquire about and investigate them and ensure compliance with applicable laws, regulations, and policies. Professional boundaries are the space between a staff member's power and control over an incarcerated or civilly committed individual and the incarcerated or civilly committed individual's vulnerability to the misuse of that power and control. Violations of professional boundaries include but are not limited to misuse of power and control over an incarcerated or civilly committed individual; giving to or receiving from an incarcerated or civilly committed individual any unauthorized item; granting special privileges of any kind to an incarcerated or civilly committed individual; spending excessive time with an incarcerated or civilly committed individual that is not warranted by official duties; discussing the personal life or issues of any employee, including one's self, with an incarcerated or civilly committed individual or in the presence of an incarcerated or civilly committed individual; discussing the personal life or issues of another incarcerated or civilly committed individual with an incarcerated or civilly committed individual or in the presence of an incarcerated or civilly committed individual; engaging in any act that may

undermine the ability of any employee to effectively manage an incarcerated or civilly committed individual. Similar behavior with the family member or friend of an incarcerated or civilly committed individual may also be a violation of a professional boundary. Staff sexual misconduct with incarcerated and civilly committed individuals, which is a violation of professional boundaries, is prohibited by M.G.L. c. 268 § 21A and 103 DOC 519, *Sexual Harrassment/Abuse Response Prevention Policy (SHARPP)*.

225.03 GENERAL GUIDELINES

A. Violations of professional boundaries may occur between an employee, contractor, or volunteer and an incarcerated or civilly committed individual with whom that person is interacting.

While some violations of professional boundaries may be viewed as minor deviations from acceptable practices, such violations can contribute to careless practices, incompetence, and negligence that compromise the Department's core values and its ability to fulfill its mission.

B. It is the personal responsibility of each individual Department employee, contractor, and volunteer to maintain professional boundaries with incarcerated and civilly committed individuals with whom they interact. Employees shall not develop or participate in relationships with incarcerated or civilly committed individuals other than what is deemed necessary in the normal course of business.

Furthermore, each individual supervisor and manager is responsible for identifying subordinates whose job duties or life circumstances may place them at a greater risk for violating professional boundaries; providing supervision and direction to those subordinates so that incidents of professional boundary violations can be prevented; and reporting violations of professional boundaries when they occur.

C. When boundaries are blurred or non-existent incarcerated and civilly committed individuals may develop inappropriate relationships with staff, which may compromise staff's professionalism and significantly jeopardize the operation of the Department's institutions and divisions.

D. Undue familiarity with an incarcerated or civilly committed individual may lead to violations of professional boundaries which may also be violations of criminal law and place the violator at risk of criminal prosecution. Such violations may include giving to or receiving gifts or other unauthorized items of value from an incarcerated or civilly committed individual or the family member of an incarcerated or civilly committed individual, or engaging in sexual misconduct with an incarcerated or civilly committed individual.

E. Employees, contractors, and volunteers from every discipline and rank who work within a Department correctional institution are at potential risk for violating professional boundaries.

F. Individual life circumstances may make some employees, contractors, and volunteers more vulnerable and at higher risk than others for violating professional boundaries. Risk factors for violations of professional boundaries include but are not limited to:

1. Life crises such as the death of a family member or divorce;
2. Personal or family illness;
3. Financial difficulties;
4. Major life transitions such as retirement or demotion;
5. Low self-esteem;
6. Job dissatisfaction or poor relationships with peers and coworkers;
7. Physical and/or social isolation from other staff.

G. There may be warning signs or "red flags" that an employee, contractor, or volunteer may be at risk of violating or has violated professional boundaries. These warning signs may include:

1. Sudden changes in appearance or dress;
2. Spending excessive time with a particular incarcerated and civilly committed individual;
3. Self-disclosure of personal problems or intimate details of one's life to an incarcerated and civilly committed individual;
4. Asking an incarcerated and civilly committed individual about personal information except on a "need to know" basis;
5. Giving to or receiving unauthorized items from an incarcerated and civilly committed individual;
6. Inappropriate communication with an incarcerated and civilly committed individual such as excessive joking or sexual talk;
7. Inappropriate communication with an incarcerated and civilly committed individual's family member or friend outside of a professional capacity;
8. Touching an incarcerated and civilly committed individual, such as patting, pinching, or repeated brushing up against the person;
9. Relaxing enforcement of rules with a certain incarcerated and civilly committed individual;
10. When being guarded, sensitive or defensive interactions with a particular incarcerated and civilly committed individual are brought into question;
11. Doing or receiving favors for or from an incarcerated and civilly committed individual;

12. Responding to routine requests in a different manner for different incarcerated and civilly committed individuals.

H. The attire of employees, contractors, and volunteers who are assigned to a correctional institution is important in establishing professional boundaries with incarcerated and civilly committed individuals. For this reason it is important that a professional appearance be maintained at all times.

NOTE: This section also pertains to Central Headquarters staff members at Central Headquarters and while they are conducting business in Department correctional institutions.

Staff who are required to wear a uniform must meet the standards in 103 DOC 224, *Uniforms*. Non-uniformed staff must wear clothing that is clean, pressed, and in good repair. This clothing must not be overly casual or inappropriate for wearing in a correctional environment. It is not the intention of this section to dictate fashion or taste but to provide a framework within which professional attire is attained. Clothing that is not appropriate for wearing in a correctional environment includes but is not limited to:

a. Jeans or any clothing made of denim of any color
b. Sweat clothing, to include hooded sweatshirts
c. Warm up suits
d. Tee shirts
e. Transparent or sheer clothing and low cut clothing tops
f. Shorts
g. Tank tops and halter tops
h. Slogans on clothing except for discrete manufacturer's logos
i. Visible underwear
j. Footwear to include:
   - Sneakers*;
   - Work boots*;
   - Beach sandals;
   - Shoes that have a division or thong between the toes;
   - Shoes that are not secured to the back of the foot (e.g., mules); and,
   - Shoes with a heel greater than four (4) inches in height
k. Extremely tight or loose fitting clothing
l. Short skirts and dresses
m. Shirts and blouses which leave any portion of the midriff exposed

*Direct care medical staff such as LPN's, RN's, and Certified Nursing Assistants shall be permitted to wear sneakers. Additionally, the Mental Health Workers at the Bridgewater State Hospital are permitted to wear sneakers. Storeroom staff are

permitted to wear work boots and/or sneakers. Sneakers may be aauthorized to be worn by non-uniformed staff with prior written approval by the Superintendent/Division Head. Be mindful that footwear should be professional and business-like.

I. While employees, contractors, and volunteers may be able to recognize that they are at high risk for violating professional boundaries, those staff who have the most interaction with them, such as their peers and first line supervisors, are more likely to make this identification. First line supervisors play an especially key role in the identification of a staff member or volunteer who may be at risk for violating professional boundaries. Because prevention of boundary violations is so important, first line supervisors shall be aware of the risk factors and warning signs and shall intervene when they believe that a staff member is at potential risk for violating professional boundaries. Such proactive intervention may include informal counseling of the staff member; providing training regarding professional boundaries; suggesting that the employee seek the assistance of the Employee Assistance Unit; or consultation by the first line supervisor with their immediate supervisor.

225.04 REPORTING

A. All allegations and incidents of professional boundary violations with incarcerated and civilly committed individuals shall be immediately reported verbally by an employee or contractor to the Superintendent or Division Head and followed up with a Confidential Incident Report prior to the end of their shift. During non-business hours these allegations and incidents shall be reported to the Shift Commander, who shall then immediately notify the Superintendent. Failure of any employee or contractor to report these allegations may result in disciplinary action, up to and including termination.

B. Depending upon the seriousness of the incident or allegation, the Superintendent or Division Head may need to notify their manager immediately and follow-up with an Urgent Matter Report.

225.05 CORRECTIVE ACTION FOR CONTRACTORS AND VOLUNTEERS WHO VIOLATE SEXUAL HARASSMENT AND ABUSE POLICIES

A. Any contractor or volunteer who engages in sexual abuse shall be prohibited from contact with incarcerated and civilly committed individuals and shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies.

B. The institution shall take appropriate remedial measures, and shall consider whether to prohibit further contact with incarcerated and civilly

committed individuals, in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer.

225.06 INVESTIGATION

A. All allegations of professional boundary violations that may violate any Department regulation, policy, or rule and may require investigation shall be reported to the Professional Standards Unit pursuant to 103 DOC 522, *Professional Standards Unit*.

B. The Chief of Professional Standards Unit or designee shall review and assess all reports and allegations of professional boundary violations and determine what course of action shall be taken regarding the investigation of those alleged violations as required by 103 DOC 522, *Professional Standards Unit*.

225.07 SELECTION AND HIRING

A. As part of the process by which employees and contractors are selected and hired, the Executive Director of Human Resources shall ensure that the pre-employment background investigation shall include an appropriate inquiry regarding any professional boundary violation problems with incarcerated and civilly committed individuals, patients, clients, students, or similar persons in their care that the prospective employees or contractors may have had in their current or previous jobs.

B. The Director of Re-Entry and Program Services Division shall develop a procedure that provides for volunteer applicants, prior to their actual selection as a volunteer, being asked as part of the selection process if they have had difficulties regarding professional boundary violations in current or former employment or volunteer situations.

C. Information obtained as a result of these inquiries shall be used as part of the selection and hiring decision-making process.

225.08 STAFF TRAINING

A. The Department is committed to educating all staff members on the issues of professional boundary violations. This training shall be conducted during all basic recruit training classes, orientation training for new employees who do not attend basic recruit training, in-service training, and all volunteer orientation programs.

B. In addition, all staff members who are newly promoted to supervisory and management positions shall receive training about the important role that supervisors and managers play in the prevention and identification of

professional boundary violations. This training shall occur as scheduling allows. Training shall include but not be limited to recognizing, preventing, reporting, and investigating incidents of professional boundaries with incarcerated and civilly committed individuals. The important role of supervisors and managers in the prevention of professional boundary violations shall be emphasized in this training.

C. All newly assigned employees to a specialized unit (e.g. BAU, SAU, BRAVE Unit) shall receive specialized training in addition to their instituion orienetation and/or in-service training prior to undertaking their job assignment.

225.09 OPERATIONAL ISSUES

A. Incarcerated and civilly committed individual workers, especially in situations that involve cross gender supervision, shall be rotated periodically.

B. The prevention of professional boundary violations may require the reassignment of incarcerated and civilly committed individuals from certain health care, program, and classification staff to other staff for provision of those services.