



STATEMENT

The YMCA works hard to ensure a wholesome, safe environment for all those individuals who walk through our doors. These policies and procedures are only one part of our efforts to prevent abuse.

However, it must be noted that no system can guarantee prevention of abuse. When all policies are implemented and maintained, a risk for abuse continues to exist, as the problem of abuse is pervasive and no system to date can assure complete safety.

State and Federal laws are continually evolving, and the YMCA will update this document as necessary.

The CYEDC would like to thank PRAESIDIUM, INC. for their assistance in developing these policies and procedures.

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I. General Definitions

A. Types of abuse

1. Physical abuse is an injury that is intentionally inflicted upon another person.
2. Sexual abuse is any contact of a sexual nature that occurs between a youth/vulnerable member and an adult or between two youths. This includes any activity which is meant to arouse or gratify the sexual desires of the person.
3. Emotional abuse is mental or emotional injury to a person that results in an observable and material impairment in the person's growth, development, or psychological functioning.
4. Neglect is the failure to provide for a person's basic needs or the failure to protect a person from harm.

B. Staff, Volunteers, Third Party Agencies & Children

1. Staff – all paid full or part-time employees including directors, program leaders, teachers, counselors or aides.
2. Volunteers – all non-paid individuals who have contact with youth/members regardless of position.
3. Third Party Agencies – persons who have contact with YMCA members but are scheduled and/or employed by outside agencies such as (Personal Care Assistants, one-on-one support persons, student teachers, specialized therapists/counselors/social workers, etc.)
4. Youth – age 17 years or younger.

High-Access Volunteers

High-Access Volunteers typically interact often or over an extended period with members. Such volunteers may be readily known to members under their supervision and to other volunteers and employees in the program. They may also supervise members with or without an employee present. High-Access Volunteers may carry a substantial amount of responsibility in a program serving consumers and such volunteers may have opportunities to develop relationships with consumers over time. Examples of High-Access Volunteers include a volunteer program instructor, a regularly scheduled volunteer coach, or a mentor for a consumer.

High-Access Volunteer screening process:

In-person interview with behaviorally based interview questions

An application with the Code of Conduct

References; and A multi-state criminal background check and national sex offender registry check.

High-Access Volunteer training process:

Initial Abuse Prevention Training required employees in similar position; and

Annual Abuse Prevention Training requires employees in a similar position.

Low Access Volunteers

Low Access Volunteers typically interact with members only in the line-of-sight of an employee and only infrequently. Such volunteers might be a parent/guardian who is helping at a one-time event, or someone who only works with adults, not members. Low Access Volunteers may not be known by the members in the program or to other

volunteers and employees. Low Access/Occasional Volunteers have limited access to members and have few opportunities to develop relationships with members over time.

Examples of Low Access Volunteers include a one-time event volunteer (such as for a fun run), parents/guardians who assist at a program where their child is a participant, a volunteer who works strictly with adults outside of the association's property, a volunteer who helps with business activities and does not interact with members, or a board member.

Low Access Volunteers are always under direct visual and aural supervision by a YMCA employee. They are never to be left alone with a member.

If not already in ActiveNet, the Low Access Volunteer's name, contact information, date of birth, etc. must be placed into the ActiveNet database.

C. Staff, Volunteer and Third-Party Persons Documentation Requirements

Prior to working in the YMCA, staff, high-access volunteers and third-party people will be required to read, sign and acknowledge these policies and complete the following:

1. Staff
 - a. Employment Application & Required HR Information
 - b. In-person interview
 - c. Three reference checks performed by YMCA staff
 - d. PA State Police Criminal Background Check
 - e. PA Child Abuse Clearance
 - f. FBI Fingerprint Clearance
 - g. Praesidium Foundations: Preventing Abuse training & [ILookOut for Abuse training](#) (on-line)

All criminal convictions are reviewed by Chief People Officer and CEO. If the screening report contains a criminal conviction, an assessment will be made whether any federal, state, or local laws require the candidate to be automatically disqualified. The Chief People Officer and CEO will contact outside resources if necessary to help make a determination of employment.

2. High Access Volunteer –(regular & direct contact with children, Y staff may or may not be present, potential supervision of children, must have recent past/present relationship with YMCA)
 - a. Volunteer Application
 - b. In-person interview
 - c. Three Reference checks performed by YMCA staff
 - d. PA State Police Criminal Background Check
 - e. PA Child Abuse Clearance
 - f. FBI Fingerprint Clearance
 - g. Praesidium Foundations: Preventing Abuse training & [ILookOut for Abuse training](#) (on-line)
 - h. All criminal convictions are reviewed by Chief People Officer and CEO. Nature of job, nature of the crime, and amount of time that has passed since conviction will be analyzed. The Chief People Officer and CEO will contact

outside resources if necessary to help make a determination of volunteer opportunity.

3. Low Access Volunteer - (episodic, Y staff always present, no direct supervision of children, must have recent past/present relationship with YMCA)
 - a. Volunteer Application
 - b. Read and sign the Prevention of Child Abuse Guidelines
 - c. Complete a criminal background check, which includes at minimum:
 - B. Multi-state criminal records search
 - C. A national sex offender registry check
4. Third Party Agencies
 - a. Must ensure required clearances & mandated reporter training are up to date
 - b. Agree to follow all YMCA policies and practices outlined in the Prevention of Child Abuse Guidelines.
 - c. All third-party people must read, sign and adhere to the Prevention of Child Abuse Guidelines Policy prior to participating in YMCA programs.

II. Code of Conduct with Youth

Our YMCA enforces zero tolerance for any type of abuse, and violation is cause for immediate termination.

The following policies are intended to assist staff, volunteers, and third-party agencies in making decisions about interactions with youths. For clarification of any guidelines, or to inquire about behaviors not addressed here, contact your supervisor.

1. To protect YMCA staff, volunteers, and program participants, a staff person, volunteer or third-party person may not be alone with a single child where others cannot observe them at any time during a YMCA program. As staff supervise children, they should space themselves in a way that other staff can see them.
2. Staff, volunteers or third-party people shall never leave a child unsupervised.
3. Restroom, locker room/changing room supervision: Staff or volunteers will make sure suspicious or unknown individuals do not occupy the restroom, locker room or changing area before allowing children to use the facilities. Staff and program volunteers will stand in the doorway while children are using the restroom or changing stalls. This policy allows privacy for the children and protection for the staff and program volunteers (not being alone with a child). If staff or program volunteers are assisting younger children, doors to the facility must remain open. No child regardless of age should ever enter a bathroom alone on a field trip. Always send children in pairs with staff or program volunteers. Locker rooms will be monitored frequently by staff members who are trained to recognize suspicious or inappropriate behavior. Third party people will not be permitted to escort youth to the bathrooms or locker rooms at any time.
4. Supervision in Aquatics environments: All swim lessons will be held in open, viewable swimming areas under the supervision of other employees. When possible, instructors will keep hands above water and visible to others and explain any actions that require use of hands to support a child. All entrances and exits to the pool area will be monitored. Changing on the pool deck is not allowed.
5. Playground and outdoor activity supervision: Blind spots that obstruct the line of sight will be identified and either not utilized or frequently monitored. Every effort will be made to keep

children within their age group. Staff will position themselves in different areas to allow for supervision of children from all angles and will continually scan for attendance when moving between activities. Staff will remain engaged with children rather than socializing with other employees or volunteers.

6. Supervising during transportation activities: No staff member or volunteer may transport a child in their personal vehicle. Bus transportation will be provided as needed to and from Camp and other events as needed. Staff members will take roll upon boarding and when leaving the bus. Staff members will be positioned at the back of the bus and in the middle of the bus. Appropriate ratios will be maintained to ensure there is maximum supervision. Staff, volunteers or third-party people should not share seats with children unless previously authorized.

7. Transition time/free time supervision: Staff will be assigned to monitor specific areas or groups during free time. Established bathroom policies must be followed. Staff, volunteers and third-party people will make sure children remain in sight and only in authorized areas.

8. Staff, volunteers, and third-party people should conduct or supervise private activities in pairs, such as putting on bathing suits, taking showers, etc. When this is not feasible, adults should be positioned so that they are visible to others.

9. Staff, volunteers, and third-party people shall not abuse children including:

- Physical abuse-strike, spank, shake, slap.
- Verbal abuse- humiliate, degrade, threaten.
- Sexual abuse- inappropriate touch or verbal exchange.
- Mental abuse- shaming, withholding love, cruelty.
- Neglect- withholding food, water, basic care, etc.

*Any type of abuse will not be tolerated and may be cause for immediate dismissal.

10. Staff, volunteers, and third-party people must use positive techniques of guidance, including redirection, positive reinforcement, and encouragement rather than competition, comparison and criticism. Staff, volunteers, and third-party people will have age-appropriate expectations and set up guidelines and environments that minimize the need for discipline. Physical restraint is used only in pre-determined situations (necessary to protect the child or other children from harm), is only administered in a prescribed manner and must be documented in writing.

11. Staff and program volunteers will conduct a health check of each child, each day, as they enter the program, noting any fever, bumps, bruises, burns, etc. Questions or comments will be addressed to the parent or child in a non-threatening way. Any questionable marks or responses will be documented.

12. Staff, volunteers, and third-party persons must respond to children with respect and consideration and treat all children equally regardless of sex, race, religion, or culture.

13. Staff, volunteers, and third-party people will refrain from intimate displays of affection towards others in the presence of children, parents, and staff.

14. The YMCA requires that all adults abide by the standards of the conduct set forth by the YMCA.

15. Profanity, inappropriate jokes, sharing intimate details of one's personal life and any kind of harassment in the presence of children or parents is prohibited.

16. Staff, volunteers, and third-party people will have a criminal background check cleared before they start working with members.

17. Staff, volunteers, and third-party people will portray a positive role model for youth by maintaining an attitude of respect, loyalty, patience, courtesy, tact, and maturity.
18. Staff and program volunteers may not be alone with children they meet in YMCA programs outside of the YMCA. This includes babysitting, sleepovers, and inviting children to your home. Any exceptions require a written explanation before the fact and are subject to approval by the President/CEO.
19. Staff, volunteers, and third-party persons may not communicate with participants/members under the age of 18 years of age via telephone, texting or e-mail nor may they date or have any intimate relations with any program participants/members under the age of 18 years of age.
20. Staff and volunteers cannot transport children in their own vehicles.
21. Under no circumstances should staff or program volunteers release children to anyone other than the authorized parent, guardian, or other adult authorized by the parent or guardian (written parent authorization on file with the YMCA).
22. Staff, volunteers, and third-party people are mandated reporters and are required to report suspicions of child abuse, including allegations of sexual abuse or victimization of minors involving Y staff, volunteers, members, or participants to their supervisors and the appropriate authorities.
23. Staff and program volunteers will be required to complete training on Child Abuse Prevention and Peer to Peer abuse training prior to their start date. All staff will be required to complete Child Abuse Prevention and Peer to Peer Abuse Training on an annual basis.

I. Policies

Policy Prohibiting the Abuse or Mistreatment of Members

This organization has **zero tolerance** for abuse and will not tolerate the mistreatment or abuse of members in its programs. Any mistreatment or abuse by an employee, volunteer, or third-party agency employee will result in disciplinary action, up to and including termination of employment or volunteer/third party service, and cooperation with law enforcement.

Abuse or Mistreatment of One Members by Another Members

The YMCA has zero tolerance for abuse, mistreatment, or sexual activity among members within the organization. This Y is committed to providing all members with a safe environment and will not tolerate the mistreatment or abuse of one consumer by another consumer. Conduct that rises to the level of abuse, mistreatment, or sexual activity will result in intervention or disciplinary action, up to and including, dismissal from the program. In addition, our organization will not tolerate any behavior that is classified under the definition of bullying, and to the extent that such actions are disruptive, the organization will take the necessary steps to eliminate such behavior.

Policy Requiring Written Communication of Policy Changes & Training

This organization will communicate changes to organizational policy manuals and/or procedures in writing within seven (7) days of the change. The organization will determine an official mode of communication and will use that to communicate any changes to policy or procedures. The organization will make efforts to communicate changes to consumers, parents/guardians Any training necessary to effectuate policy or procedure changes will be assigned to relevant employees and volunteers and is expected to be completed as soon as practicable.

A. PHYSICAL

Policies define the bandwidth of acceptable behavior in an organization. Because offenders often violate policies to gain access to youths, when staff know and understand policies, they can identify, interrupt, and report policy violations. Simply interrupting a policy violation can prevent a false allegation of abuse or put an offender on notice that no one works in private, the rules apply to everyone, and violations will be detected.

A. Physical Contact

Our organization's physical contact policy promotes a positive, nurturing environment while protecting members, employees and volunteers. Our organization encourages appropriate physical contact with members and prohibits inappropriate displays of physical contact. Any inappropriate physical contact by employees, volunteers, or third-party persons towards consumers in the organization's programs will result in disciplinary action, up to and including termination of employment or access to the YMCA.

The organization's policies for appropriate and inappropriate physical interactions include but are not limited to:

Appropriate Physical Interactions	Inappropriate Physical Interactions
Contact initiated by the members such as: • Side hugs • Shoulder-to-shoulder or "temple" hugs • Pats on the shoulder or back • Handshakes • High-fives and hand slapping • Pats on the head when culturally appropriate • Touching hands, shoulders, and arms • Arms around shoulders • Holding hands (with young children in escorting situations)	• Full-frontal hugs • Kisses • Showing affection in isolated areas or while one-on-one • Lap sitting • Wrestling • Piggyback rides • Tickling • Allowing a consumer to cling to an employee's or volunteer's leg • Allowing consumers, older than kindergarten, to sit on an employee or volunteer's lap • Any type of massage given by or to a consumer outside of accepted and documented medical treatment • Any form of affection that is unwanted by the consumer or the employee or volunteer • Touching bottom, chest, or genital areas that is outside authorized and documented personal care assistance.

B. Verbal Interaction

Employees, volunteers and third-party people are prohibited from speaking to members in a way that is, or could be construed by any observer, as harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning, or humiliating.

Employees, volunteers and third-party people must not initiate sexually oriented conversations with members. Employees, volunteers and third-party people are not permitted to discuss their own sexual activities with members.

Our organization's policies for appropriate and inappropriate verbal interactions include but are not limited to:

<i>Appropriate Verbal Interactions</i>	<i>Inappropriate Verbal Interactions</i>
• Positive reinforcement • Appropriate jokes • Encouragement • Praise • Strength-based conversations • Self-disclosure as a supervised therapeutic tool by licensed clinicians, medical professionals, and pastoral counseling	• Name-calling • Discussing sexual encounters or in any way involving consumers in the personal problems or issues of employees and volunteers • Secrets • Cursing • Off-color or sexual jokes • Shaming, belittling • Oversharing personal history • Derogatory remarks • Harsh language that may frighten, threaten or humiliate consumers • Derogatory remarks about the consumer or his/her family • Compliments relating to physique or body development

C. One-on-One Interaction

Most abuse occurs when an adult is alone with a youth. Our organization aims to eliminate or reduce these situations and prohibit private one-on-one interactions unless approved in advance by the organization administration.

In those situations where one-on-one interactions are approved, employees, volunteers and third-party people should observe the following additional guidelines to manage the risk of abuse or false allegations of abuse:

<i>Additional Guidelines for One-on-One Interactions</i>
• When meeting one-on-one with a youth, you always do so in a public place where you are in full view of others. Third Party Persons are never permitted to be one-on-one with members unless they are visibly always monitored by a YMCA employee. • Avoid physical affection that can be misinterpreted. Limit affection to pats on the shoulder, high-fives, and handshakes. • If meeting in a room or office, leave the door open or move to an area that can be easily observed by others passing by. • Inform other staff and volunteers that you are alone with a youth and ask them to randomly drop in. • To the extent possible, ensure one-on-one interactions occurring behind closed doors are scheduled in advance, take place in a room with windows or glass in the door, and/or are communicated to your supervisor. • Ensure one-on-one interactions are documented, especially if behind closed doors. Keep documentation of these meetings (such as in shared calendar, case notes, etc.) and share with your supervisor. • Document and immediately report any unusual incidents, including disclosures of abuse or maltreatment, behavior problems and how they were handled, injuries, or any interactions that might be misinterpreted.

1. Tutoring/ Private Coaching:

One-on-one situations, such as tutoring and private coaching sessions, introduce additional risks for false allegations. Staff and volunteers should be aware of our policies regarding tutoring and private coaching:

- a. Staff and volunteers must have supervisor approval for any tutoring or private coaching sessions.
- b. Tutoring and coaching sessions with our organization's youths may not occur outside of the organization.
- c. Supervisors must keep a schedule of private tutoring and coaching sessions, which should include times, youths involved, and location of sessions.

D. Off-site Contact

Many cases of organizational abuse occur off-site and outside of regularly scheduled activities. This contact outside of regularly scheduled activities may put staff, volunteers, and our organization at increased risk. Our organization prohibits interactions outside of regularly scheduled program activities. In addition, staff are not permitted to babysit youth who are involved in our YMCAs.

Examples of contact outside of regularly scheduled program activities:

- Babysitting arrangements
- Tutoring
- Private lessons/coaching
- Mentorship
- Social interactions between employee's or volunteer's children and children served by the organization:
 - Playdates and birthday parties
 - Sleepovers
 - Overnight trips and vacations
 - Rides to/from organization or extracurricular activities and events
- Attending public events in a shared community (like graduation, sports events, religious ceremonies)
- Continued contact with consumer after a consumer's participation in a program has ended

In addition, when outside contact is unavoidable, ensure that the following steps are followed:

1. Supervisors should identify for staff and volunteers what types of outside contact are appropriate and inappropriate.
2. Ensure that staff or volunteers have the parents' permission to engage in outside contact with the youth. Consider requiring the parents to sign a release-of-liability statement.

E. Electronic Communication

While assigned to work with youth, employees, volunteers and third-party people are not permitted to use electronic communication devices (including, but not limited to, cell phones) except during approved breaks and in emergency situations. Internet use, text messaging, use of social media, and/or emailing pictures while assigned to work with youth is strictly prohibited regardless of the type of device used and whether for business or personal reasons. Staff and volunteers need to ensure that friends and family members are aware of this policy.

The taking of pictures on electronic devices and/or posting to social media is limited to YMCA Director-level staff and approved staff by said Director(s). No photos of youth are allowed to be stored on a personal device and staff /volunteers will be subject to immediate termination if found doing so.

All information and history on YMCA computers and devices is the sole property of the YMCA and subject to search.

Any private electronic communication between youth and staff and volunteers, including the use of social networking websites, is prohibited. The following are examples of appropriate and inappropriate electronic communication:

Appropriate Electronic Communication	Inappropriate Electronic Communication
• Sending and replying to emails and text messages from youth ONLY when copying a guardian • Public postings on Association group pages on Facebook or other approved public forms	• Any harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning, humiliating, or sexually oriented posts • Private messages between staff and volunteers and youth • Posting pictures of YMCA participants on social media • "Friending" youth participants on social networking sites

F. Electronic Communication and Social Media Code of Conduct

The terms "electronic communications" and "social media" or "social network" refer to activities that integrate technology, telecommunications, and social interaction using words, images, video, or audio tools. Examples include, but are not limited to social websites, blogs, message boards, wikis, podcasts, image- and video-sharing sites, text and voice chat platforms for gaming, live webcasting, and real-time web communities. Additionally, sending text messages between two or more mobile phones or fixed or portable devices over a phone or wireless network is included within these definitions.

In recent years, electronic communication and social media platforms have become increasingly popular. While these tools provide many benefits, they also present the potential for inappropriate behavior, increased access to vulnerable consumers, and privacy violations. Employees, volunteers, third-party people and consumers participating in this organization's programs, events, and activities shall adhere to the following Social Media Code of Conduct:

1. Do not engage in behavior or comments that are, or could be construed by any observer to be, harsh, abusive, coercive, threatening, intimidating, shaming, derogatory, demeaning, or humiliating.
2. Do not engage in personal attacks, sexually oriented conversations, or discussions about sexual activity.
3. Be a positive role model by exhibiting professionalism in all interactions; portray an attitude of respect, loyalty, patience, courtesy, tact, and maturity.
4. Only program-related messaging may be communicated electronically between employees, volunteers of the organization or third-party persons and members, and parents/guardians. Such communication should generally occur during standard business hours.

5. Employees and volunteers are prohibited from sending private messages to members and/or replying to private messages from a member. If a member attempts to privately communicate with an employee or volunteer electronically, their supervisor must be notified immediately.
6. Personal social networking profiles and/or blogs of employees, volunteers, and third-party people shall be private and not shared with members. Employees, volunteers, and third-party persons with profiles on social networking sites shall not request to be "friends" with or follow members or approve friend or follow requests from members.
7. Employees and volunteers may not engage in electronic communication or social media contact with other family members or friends of members.
8. Never reveal sensitive or confidential information, including identifiable details or photos of a consumer without written consent from their parents or legal guardian.
9. Employees, volunteers, and third-party people may not post or share on their personal social media accounts any photographs or videos of consumers participating in the organization's programs.
10. Employees, volunteers, and third-party people may not post or share inappropriate photos or comments on photos of members.
11. Do not make pornography in any form available to members participating in the organization's programs, events, and activities or assist consumers in any way in gaining access to pornography.
12. Employees, volunteers, and third-party people may not create web pages on behalf of the organization unless they have prior approval to do so and may not misrepresent their work with the organization or the organization itself.
13. Employees and volunteers engaging in social media and online communication become a public figure associated with the organization and are responsible to help protect the organization and its consumers. Always act in a professional and constructive manner and use sound judgement before posting or sharing content.
14. Rather than personally defend the organization's reputation, employees and volunteers should notify their supervisor or an administrator of a negative comment or online representation or if any member of the media contacts them about any matter related to the organization.
15. Employees, volunteers, and third-party people must adhere to uniform standards of electronic communication and social media use as outlined in any applicable organizational policies and procedures.
16. This Code of Conduct and associated policies and procedures shall be provided to parents/guardians of members. It shall also be available on the organization's website for public view.
17. Consumers and Parents/guardians may request in writing that a consumer not be contacted through any form of electronic communication or social media by an employee or volunteer of the organization.

Cell Phone Use:

While assigned to work with youths, employees, volunteers, and third-party people are not permitted to use electronic communication devices except during approved breaks and emergency situations. Third party people documenting notes on electronic devices must

never include information about another member of the program. This includes refraining from using any identifying information such as description or names of program participants. Third-party people who share private information of YMCA participants can and will be held lawfully liable.

Use of personal electronic communication devices to contact (via voice, text, or pictures/video) organization members and/or program participants for personal and/ or inappropriate reasons shall be grounds for discipline up to and including termination of employment.

Acceptable Use of Cell Phones during Program Hours:

There are occasions on which staff will need to use personal, or organizationally issued electronic communication devices. In these cases, staff will have explicit directions from supervisors governing use. Situations which may require the use of organization issued or personal electronic communication devices include:

- a. Field Trips
- b. Off-site Programs
- c. Emergencies

G. Gift Giving

Abusers routinely groom youths by giving gifts, thereby endearing themselves to the youth. They might instruct the youth to keep the gifts a secret, which then starts teaching the youth to keep secrets from parents. For this reason, staff and volunteers should only give gifts to groups of youths, and only under the following circumstances:

- 1. Administration must be made aware of and approve the gift.
- 2. Parents must be notified.

H. Use of Technology Code of Conduct

Our organization utilizes technology in nearly every facet of programming, communication, and operation. This policy outlines expectations for the use of technology, both provided by the organization and personally owned (during programming), by employees, volunteers, and members ("Users"). Technology is a comprehensive term including, but not limited to, all organization and personally owned computers, projectors, televisions, iPads, tablets, multimedia players, cameras, cell phones, smartwatches, and/or other technologies.

All members of our community have a responsibility to use both personal and organization owned technology in a responsible, lawful, and ethical manner. User use of technology during programming must be consistent with our organization's philosophy, goals, and ethical standards. This organization will not tolerate any form of pornography and prohibits the access, display production, possession or distribution of pornography on the organization's property or equipment or during any organization associated activity on or off the premises.

Use of Filters on Organization-Owned Technology

This organization will block or filter content over its internet and technology that the organization considers inappropriate. This includes pornography, obscene material, and other material that may be harmful to consumers or against the mission and standards of this organization. The organization reserves the right to block or filter other content deemed to be inappropriate, lacking educational or work-related content or that poses a threat to the network. The organization may, in its discretion, disable such filtering for certain users for bona-fide research

or other lawful educational or business purposes. Users shall not use any website, application, or methods to bypass filtering of the network or perform any other unlawful activities.

Standards of Electronic Communication

All communication that takes place using personally owned (during programming) or organization-owned technology must reflect the mission and values of our organization. This includes but is not limited to emails, texts, messages, and posts online. Additionally, User communications must be through official organizational email accounts for all programmatic and organization-related business. Official organization email accounts will be provided for Users for such purposes. Email is intended for use for programmatic purposes only.

To responsibly communicate online Users MAY NOT:

1. Access, send, receive, download, produce, or distribute any offensive, profane, threatening, pornographic, or sexually explicit material at any time, for any reason.
2. Access websites, newsgroups, or chat areas that contain material that is counter to the organization's mission or that promote illegal acts.

When using technology, Users are expected to:

1. Use technological tools and hardware for programmatic purposes only.
2. Prohibited from using personal or organization owned devices in restrooms, locker rooms, or other areas where there is a reasonable expectation of privacy.
3. Refrain from using cell phone cameras and/or any recording functions, on the cell phone or within apps, during programming unless permission is granted. If permission is granted, the camera or recording feature is only to be used as directed by the employee or volunteer only for that particular purpose.
4. Use the network for any activity or to transmit any material that violates federal, state, or local laws.
5. Refrain from harassing, bullying, taunting, hazing, or otherwise acting in a manner toward employees, volunteers, and consumers that is counter to the organization's mission, including its prohibition against bullying and hazing. **This organization has zero tolerance for cyberbullying.**
6. Refrain from engaging in personal attacks, harassing others, posting confidential and/or personal information about others, or posting in a libelous, disrespectful, or harassing manners. **Violators will face serious disciplinary action, up to and including removal from the organization.**

Expectation of Privacy

Users do not have an expectation of privacy in communications transmitted through organization devices or technology. Our organization reserves the right to monitor and track online behaviors and interactions via organization-owned technology. Emails, messages, and other information sent through the organization's network can be inspected and files saved onto organization computers may be reviewed at any time.

In addition, Users have a limited expectation of privacy when using their own technology, particularly when activity violates the law or organization policy, and/or compromises the safety and wellbeing of other members of the organization. We will investigate reports of inappropriate posts or other online activity, and hold employees, volunteers, third party persons and consumers accountable for online activity that violates the law or organization policy, and/or compromises the safety and wellbeing of other members of the organization.

I. Policy Governing Mandatory Reporting Requirements for Employees and Volunteers

All employees and volunteers must follow state specific mandatory reporting requirements. Employees and volunteers must be trained to be aware of and understand their legal and ethical obligation to recognize and report suspicions of mistreatment and abuse. Employees and volunteers will:

1. be familiar with the symptoms of abuse and neglect, including physical, sexual, verbal, and emotional abuse.
2. know and follow organization policies and procedures that protect against abuse.
3. report suspected abuse or neglect to the appropriate authorities as required by state mandated reporter laws; and
4. follow up to ensure that appropriate action has been taken.

Employees and volunteers will read and sign the Code of Conduct documenting employee's or volunteer's understanding of the legal and ethical duty to report suspected mistreatment or abuse.

To report abuse or suspicion of abuse

A. Call Childline at 1-800-932-0313

B. Make a report online <https://www.compass.state.pa.us/cwis>

J. Policy Requiring Cooperation with Investigations

This organization takes every allegation of abuse or misconduct seriously and will fully cooperate with the authorities to investigate all cases of alleged abuse or misconduct. Employees and volunteers shall cooperate with any external investigation by outside authorities or internal investigation conducted by the organization or people given investigative authority by the organization.

Cooperation with investigations includes, but is not limited to:

- Promptly acknowledging and responding to requests for information.
- Making oneself available for meetings with investigating officials.
- Providing full, accurate, and truthful information.
- Keeping confidential information learned or transmitted during the investigation, unless directed by legal authorities, and
- Preserving relevant information and documents.

An employee or volunteer's failure to cooperate with an investigation will result in disciplinary action up to and including termination of employment or dismissal from the organization.

K. Prohibited Practices

Alcohol, Drugs, and Tobacco

Possession and/or use of alcoholic beverages, drugs and tobacco products while at the organization is strictly prohibited. Members, employees, volunteers and visitors will not be permitted to participate in any program while under the influence of alcohol, drugs, or illicit substances. Parents/guardians will be notified as appropriate.

Weapons

We want our organization to be a safe place for members, children, and families. Weapons and items that may be considered weapons are prohibited. Anyone found to be in possession of such items will be required to leave and the items will be confiscated. This includes laser pointers. Parents/guardians, and/or the authorities will be notified as appropriate.

Violence

Our organization seeks to provide a safe environment for individuals in our community. Violence and threats of violence will not be tolerated at The YMCA of Eastern Delaware County on our grounds, in organization facilities, in other facilities being utilized by our organization, or during YMCA of Eastern Delaware County sponsored activities and events. Employees are available to assist in the resolution of differences.

Disruptive Behavior

We take pride in the appearance of our organization, and we always want to ensure members are safe. Inappropriate or disruptive behavior is not permitted in our organization. This includes, but is not limited to, graffiti, littering, spitting, or throwing objects that could intentionally or unintentionally harm others or cause disorder.

Bullying

Our organization will not tolerate the mistreatment or abuse of anyone. Bullying is aggressive behavior that is intentional, is repeated over time, and involves an imbalance of power or strength. Bullying can take on various forms including:

1. *Physical bullying* – when one person engages in physical force against another person, such as by hitting, punching, pushing, kicking, pinching, or restraining another.
2. *Verbal bullying* – when someone uses their words to hurt another, such as by belittling or calling another hurtful name.
3. *Nonverbal or relational bullying* – when one person manipulates a relationship or desired relationship to harm another person. This includes social exclusion, friendship manipulation, or gossip. This type of bullying also includes intimidating another person by using gestures.
4. *Cyberbullying* – the intentional and overt act of aggression toward another person by way of any technological tool, such as email, instant messages, text messages, digital pictures or images, or website postings (including blogs). Cyberbullying can involve:
 1. Sending mean, vulgar, or threatening messages or images.
 2. Posting sensitive, private information about another person.
 3. Pretending to be someone else in order to make that person look bad; and
 4. Intentionally excluding someone from an online group.
5. *Hazing* – an activity expected of someone joining or participating in a group that humiliates, degrades, abuses, or endangers that person regardless of that person's willingness to participate.
6. *Sexualized bullying* – when bullying involves behaviors that are sexual in nature. Examples of sexualized bullying behaviors include sexting, bullying that involves exposures of private body parts, and verbal bullying involving sexualized language or innuendos.

Anyone who sees an act of bullying, and who then encourages it, is engaging in bullying. This policy applies to all members, employees, and volunteers.

II. Monitoring and Supervision

When staff are adequately supervised, potential offenders are less likely to act on their impulses because they face detection. When youths are adequately supervised, they too are less likely to engage in inappropriate interactions with others. Similarly, the physical plant must be monitored, particularly out-of-the-way locations or locations that might permit an offender undue access to

or privacy with a youth. Effective supervision and monitoring require that a variety of methods be used frequently, at both scheduled and random times.

Volunteer, and Visitor Identification Badge Policy Employees and Volunteers

Every CYEDC employee is required to wear an identification badge and Y authorized clothing while present at any Y facility or program unless the organization determines that identification presents a safety risk to the employee. Volunteers and Third-Party Persons must also display identification badges as outlined in CYEDC guidelines. Badges must be worn on the person's clothing at or above the waist level and in such a fashion to be clearly visible to other employees, volunteers, and security personnel at all times.

When an employee, volunteer or third-party person arrives at the facility without an appropriate identification, the supervisor in charge will assist that person as provided in subparts (a) and (b) below.

a) A person without a badge shall present photo identification to the membership desk. The desk personnel will check the name against the current employee or volunteer roster and, if the identification is verified, the staff member will require the person to sign in and then issue a temporary "Employee" identification badge.

If the membership desk is unable to verify employment or volunteerism, the staff will contact the person's department or office by phone to seek verification. If employment or volunteerism is verified, the desk staff will require the person to sign in and then issue a temporary identification badge. If employment or volunteerism cannot be verified, the person will be denied access.

b) Employees or volunteers without badges, but who are known by the membership staff, will be required to sign in and then be issued a temporary "Employee/Volunteer" badge, which they must return at the end of the workday.

Visitors

When a visitor or third-party person arrives at the facility without an authorized identification badge, he or she will report to the membership desk and provide government issued ID. The desk staff shall verify a visitor's identity by inspection of a form of photograph identification, when applicable. Membership staff will run a RAPTOR search on the visitor and if clear will issue the person a "Visitor" identification badge and notify the department or office that the visitor has arrived. The "Visitor" shall wait at the lobby area for a representative to escort the visitor to the department or office. A department or office representative must escort the visitor back to the front desk to return the badge prior to the visitor's departure or have the visitor sign out in the visiting department and retain copies of signatures. Visitors are required to wear a temporary "Visitor" identification badge at all times while in the facility.

Identification in Programming Away from the Facility

Our employees, volunteers and third-party people must wear organizational attire or photo ID badges that clearly distinguish them as authorized representatives when visiting members at residential/off site placement, going to appointments with members, or when they are in other places where being identifiable is necessary. With approval from a supervisor, employees and volunteers may choose not to wear identifiable attire or badges when meeting with consumers in the community or public places.

A. Facility Monitoring

Because most incidents of sexual behavior occur in private, the extent to which privacy is managed, risk is managed. To ensure that all of the locations are properly and consistently monitored.

B. Checking Members into a Facility:

1. When anyone (members, guests, residents, construction workers, maintenance, cleaning crews, third party organizations, etc.) enters the facility during operational hours, they must check in with the front desk.
 - a. Members must be checked into the facility using the membership software.
 - b. RAPTOR System - Upon entering our facilities, any visitor 18 and older will be required to present a valid government issued ID, which will be scanned into the system. This information is compared to the national database of registered sexual offenders. Once cleared, the individual may enter the facility.
 - c. Acceptable forms of identification include State Driver's license/State Photo ID card; Resident Alien ID card; Military ID; Passport ID card; Mexican Consulate card.
 - d. All Nonmembers must follow the check-in procedures listed below (#4).
 - e. All contractors, in addition to #4, must show a work-Id which will be copied and kept in file. If no work-Id is available, facility access will be denied.
2. When possible, create a single point of entry and exit in the facility.
3. If there is more than one entrance or exit, ensure these other points of access are consistently monitored.
4. Proper Identification for Guests - All guests are required to be screened by the RAPTOR System. Photo-ids will be photocopied and kept on file. All guests must sign the liability waiver. Guests will also be registered in the membership software and have their picture taken and saved to their guest account. Next-day phone calls to thank new guests for visiting will be made as a way to check against false identification. If the phone number is not valid, the guest will be denied future facility access.
5. Utilize headcounts or conduct attendance checks to ensure continuous awareness of which members are in programming.
6. Maintain written or electronic documentation of attendance in programming.

C. Employees and volunteers must effectively monitor and supervise member-to-member:

Employees and volunteers must effectively monitor and supervise member-to-member interactions to prevent member-to-member inappropriate behaviors and abuse. When supervising members, it is important to remember that adult employee and volunteer behavior sets the tone, and members should not determine what is and is not acceptable behavior.

Employees and volunteers should ensure:

1. Member interactions are age and developmentally appropriate.
2. Members respect each other's boundaries.
3. Members are not bullying, teasing, dominating, or displaying sexualized behaviors toward others.
4. Members solve problems without fighting.

Employees and volunteers will utilize monitoring and supervision best practices such as line of sight supervision, zone monitoring and listening and observing for inappropriate behaviors between consumers. Using these methods, employees and volunteers consistently monitor high-risk areas.

D. General Supervision

Programs are required to Adhere to Specific Adult-to-Member Ratios.

Specific-to-consumer ratios help define the level of supervision necessary to be effective and safe. Ratios also enable employees, volunteers, and supervisors to easily identify when additional personnel are necessary. This organization will ensure all programs adhere to the following specific staff-to-youth ratios:

- Infants 1:4 children
- Young Toddlers 1:5 children (age 1-2)
- Older Toddlers 1:6 children (age 2-3)
- Preschoolers 1:10 children (age 3-5)
- Kindergarten children enrolled in OST 1:12
- OST grades 1 to 6 and all Camp Programs 1:12
- Grade 7 and up including vulnerable adults 1:15
- Aquatics Swim children under 3yrs 1:1
- Aquatics Swim lessons Preschool 3-5yrs 1:5
- Aquatics Swim lessons level 1 1:5
- Aquatics Swim lessons level 2 1:6
- Aquatics Swim lessons level 3 1:7
- Maximum swimmer to lifeguard ratio 1:25
- Swim Team ratios vary based on skill level
- Youth Sports programs 1:10
- All Abilities Classes 1:1

1. **Administrative and Supervisory Visits to Youth Programs-** Youth supervisors and administrators will regularly visit all youth programs to ensure that all activities are well- managed and that youth policies are observed by all in attendance.
2. **Ratios-** Each program will follow the ratio requirements that are directly to the goals of the program and the design of the program area. The staff or volunteer-to-youth ratio should be adjusted for programs that serve youths with special needs.
3. **Mixed Age Groups-** In most incidents involving one youth abusing another youth, the youths are from different age groups. Each program is responsible for establishing specific guidelines for additional monitoring and supervision of activities that involve youths from different age groups. Staff and volunteers must be aware that close line of sight supervision is required when monitoring programs that mix age groups.

E. Monitoring Youth in Facilities

Generally, youths under the age of 12, or 7th grade, should not be alone in the facility without a parent or guardian present. At this age, most youth have had the experience of being without immediate parental supervision. In addition, 12-year-old youths are able to use self-protection skills in the event that they are approached inappropriately by another youth or by an adult.

However, we recognize that many youth programs permit younger children to access the facilities for many reasons.

That said, because we are responsible for all youths in the facility, we will:

- Require a parent or legal guardian to complete a membership application which includes identifying information, any special medical or behavioral circumstances, any

legal indemnifications, the youth's date of birth, and emergency contact information. In addition, require all youths to sign-in AND to the facilities.

- Require youths to sign a Code of Conduct that outlines the behavioral expectations and policies regarding appropriate and inappropriate interactions. We will require parents to sign this Code of Conduct as well, so that they are aware of the policies and procedures
- Whenever possible, have a parent orientation and information session. This meeting will provide an opportunity to review expectations and requirements, and the chance to establish a relationship with the parents.
- Provide supervision both directly, indirectly, and with a combination of the two techniques.
 - a. For direct supervision, the program may offer structured, scheduled activities like basketball tournaments, swimming activities, arts and crafts, etc. These activities will have at least two or more staff assigned to lead and supervise.
 - b. For indirect supervision, such as open gym or recreational swim times, certain areas of the building will be designated as authorized areas. Authorized areas could include a gymnasium, a game area, or a classroom for doing homework and so on. Authorized areas must be easily visible and routinely and systematically checked by staff. Youths should know that they will be supervised by staff at all times, and all staff should know which areas are authorized and which are not.
- Supervision standards for the authorized areas, include:
 - a. Weekly monitoring of all areas
 - b. Supervision and monitoring by department head or supervisor in charge
 - c. Staff are required to record when they monitor authorized areas and submit documentation to branch leaders.
- All program staff will wear nametags or identifying clothing so that the youth can easily recognize them as staff.
- Train all staff:
 - a. To greet youths that enter the facility; to direct youths to the structured activities or authorized areas; and, to redirect youths who are not in an authorized area or who are not participating in a structured activity.
 - b. To be aware of the risks involved with mixing age groups and how to monitor activities involving mixed age groups.
 - c. To routinely monitor high risk areas (such as bathrooms, locker rooms, and unused rooms). This staff should document the scheduled and periodic sweeps of high risk locations.

Ultimately, all kids must be supervised at all times, regardless of age. The key to remember is that they can be supervised directly in structured activities and indirectly when they are in authorized areas.

F. Monitoring High Risk Activities

1. Bathrooms

Bathrooms are high risk locations for sexualized behavior by/between youth. Adult offenders can use the privacy afforded in bathrooms and during shower time to abuse a youth.

Consequently, bathrooms and shower time require close monitoring, and these practices must be carefully managed. Shower time also presents increased risk, because youth may be nude or partially nude and youth may engage in horseplay.

When supervising bathroom use, adult employees and volunteers should first quickly scan the bathroom before allowing youth to enter to ensure the bathroom is vacant. Third party persons must defer bathroom/locker room supervision to *employees only* unless medically necessary.

For Group Bathroom Breaks:

- Employees and volunteers must take groups of two or more youth to the bathroom – following the “rule of three” or more.
- If the bathroom only has one stall, only one youth should enter the bathroom while the others wait outside with the employee or volunteer.
- If there are multiple stalls, employees and volunteers must only send in as many youth as there are stalls available for use.
- Minimize youth of different ages using the bathroom at the same time.
- Employees must stand outside the bathroom door but remain within earshot.

For single use restrooms:

- Youth must ask permission to use the bathroom.
 - Employees must frequently check bathrooms.
 - All managers and/or on-duty supervisors must frequently check bathrooms and ensure employees are monitoring bathrooms correctly and at established intervals.

For shower time:

- Only one youth can be in a shower stall at any given time.
- If there are multiple stalls, staff must only send in as many youths as there are stalls.
- Minimize youth of different ages showering at the same time.
- Ensure shower doors/curtains do not extend all the way to the ground so employees and volunteers can easily glance into the bathroom to see how many feet are in each shower stall.
- Employees and volunteers must stand outside the shower area but remain within earshot.
- Employees and volunteers are prohibited from using the bathroom at the same time as youth.
- When it is necessary to help young youth in the stalls, employees and/or volunteers should keep the door open if it does not infringe on the youth’s right to privacy. For example, if possible, keep the stall door cracked so passersby can see the adults assisting but not the youth.
- Youth who require assistance with personal care activities should have this noted within their file and include the level of assistance necessary.
- Employees and volunteers who are authorized to provide assistance with personal care activities must receive specific training on appropriate diapering and toileting procedures.

2. Locker Room Activities

Locker rooms and changing areas are high-risk locations for sexual activity between consumers, and adult offenders can use the privacy afforded in locker rooms to abuse a consumer. Consequently, locker rooms require close and regular monitoring, and these practices must be carefully managed. Locker rooms also present increased risk, because consumers and adults may be nude or partially nude and consumers may engage in horseplay.

Our locker room and changing areas procedures:

- Require employees and volunteers to stand within earshot of locker room when in use by consumers.
- Require employees to intermittently and briefly check inside the locker room so users know the locker room is monitored.
- Encourage employees to provide consumers with a strict time limit of how long they can be in the locker room to limit the opportunity for inappropriate interactions and activities.
- Discourage the use of locker rooms by consumers of different ages at the same time.
- Prohibit the use of locker room horseplay such as towel snapping.
- When possible, arrange lockers to minimize unnecessary privacy.
- Require all employees (including maintenance) and volunteers to also watch for suspicious or inappropriate locker room conduct.

3. Transition Times and Free Times

Transition times and free-choice times (or free times) pose a high risk for incidents because during these times, staff and volunteers may not be assigned a particular group of youths to supervise. To decrease the risk of incidents, we will:

- a. Require youths to always remain in line-of-site of staff.
- b. Specify the staff-to-youth ratio.
- c. Specify narrow geographic boundaries in the program areas.
- d. Ensure that all staff are assigned specific areas to supervise ("zone monitoring").
- e. Include bathroom procedures.
- f. Require periodic roll calls for each age group.
- g. Require supervisors to conduct periodic check-ins and sweeps of the entire activity area.

4. Naptime/Sleeping areas

- Employees, volunteers, third party people, and members should not sit or lie on anyone's bed/rest mat or be in anyone else's sleeping bag.
- Encourage members to draw an imaginary line around their sleeping space and encourage them to report violations to an employee or volunteer.
- Employees and volunteers will not leave members alone during nap time
- Do not let members share a sleeping mat, blanket, or sleeping bag.
- Pay attention to who is sleeping next to whom.
- Arrange sleeping areas with as much space as possible between each member.
- Do not let members nap in areas not visible to employees and volunteers.
- Keep the room sufficiently lit so that you can easily observe all members.

5. Monitoring and Supervising Diapering, Toileting, and Personal Care Assistance

Personal care may involve a variety of activities, such as diapering, toileting, bathing, and dressing. It is important to follow personal care procedures for both the protection of the members, as well as for the protection of employees and volunteers from false allegations.

When assisting children/members with personal care:

- Always use the least intrusive methods possible. For example, allow the child/member to do as much as they can by themselves. To the degree possible, use verbal prompts, instead of physically touching child/member, to guide them in self-assisting tasks.
- Avoid staring at the child/member's body.
- Document any observed injury, disclosures of abuse, or any interactions that may have been misinterpreted.
- Avoid giving physical affection. If physical affection is necessary, limit it to handshakes or high fives. Avoid more intimate forms of physical affection such as hugs.
- Allow for informal monitoring as long as it does not infringe on the child/member's right to privacy. For example, if possible, keep the bathroom or bedroom door cracked so passersby can see the adult assisting but not the child/member.
- Make every attempt to have employees of the same gender as that of the member to provide personal care.

For diapering:

- Placing the changing table in an open area where adult actions can be observed by others.
- Encouraging that diapers only be changed when at least two adults, or individuals, are present.
- Requiring written documentation of diaper changing when outside the normal caregiving expected routines in early childhood.
- Informing supervisors if employees notice anything out of the ordinary or concerning while changing the child/member's diaper.
- Requiring employees to know and follow all licensing requirements having to do with diapering.

For toileting:

- Require employees to stand in the doorway with the door ajar while the child/member uses the restroom.
- If employees must enter the restroom to assist a child/member, ensure that the door to the restroom remains open.
- When possible, send in only one child/member at a time. If that is not possible, send in only as many children/members as there are stalls.

6. Guidelines for Supervising Playground and Recreational Activities

Playgrounds and recreational activities can allow mixed age groups of consumers to have access to one another and create increased opportunities for inappropriate interactions between members. Employees, volunteers and third-party people can become distracted by a member who does not behave properly in less structured situations. They may get involved in conversations with each other or step away to tend to personal business, such as phone calls. Playgrounds may have blind spots or equipment which obstruct supervision.

To reduce risk, procedures for playgrounds and recreational activities require:

- Minimum employee/volunteer to member ratios, which should mirror other activity ratios and consider:
 - age and number of members present.
 - special or unique member needs.
 - type of structures and equipment and the number of distinct activities occurring simultaneously.
- Size and configuration of playground/recreation area, i.e. barriers to supervision, whether physical boundaries like fences exist, geography and location, whether other

outside groups will also be present. Definition of specific authorized areas and boundaries, including:

- if and how outside groups can be cleared from activity areas during programming.
- if outside groups or mixed ages are using facilities at the same time, delineate boundaries so that different groups do not intermix.
- Specific instructions on how to monitor barriers to supervision (such as storage sheds, playhouses, tunnels, and shrubs):
 - identify in advance any blind spots or equipment that obstruct line of sight
 - supervision and designate them off limits or plan regular walk throughs of those areas
 - station employees and volunteers near playground equipment such as tunnels and slides to reduce the appearance of privacy.
- Employees and volunteers assigned to specific areas to supervise, i.e. zone monitoring:
 - ensure recreation supervisors are adequately spaced around the whole area; they should continuously move within their assigned zone.
 - position them around the perimeter of the recreation area to ensure ample supervision and that consumers remain in approved spaces.
- Active supervision:
 - employees and volunteers should position themselves to be able to see and hear all consumers to whom they are assigned.
 - anticipate what consumers will do and redirect when necessary.
 - listen and notice changes in sound or absence of sound.
 - remain engaged with members rather than socializing with other employees or volunteers.
- Reviewing boundaries and rules with members prior to the activity, including that they are to always remain in line of sight of employees and volunteers and how to report inappropriate behaviors.
- Specific bathroom procedures to be defined, ensuring there are enough recreation supervisors to always maintain ratios.
- Employees and volunteers periodically scan and conduct name to face roll calls for each age group and whenever moving from one activity or space to another.
- If you are working with a colleague, make sure you each know the area or which consumer you are watching.
- Prohibiting employees and volunteers from using cell phones for personal business.
- Means of communicating with other recreation supervisors, including inside employees if possible, so they can get assistance when needed without exceeding ratios.
- An emergency plan for responding to incidents.
- Supervisors conduct periodic check-ins and assessments of the activity period and of the entire activity area.

7. Transportation Activities

Transporting youths may increase the risk of abuse or false allegations of abuse because staff and volunteers may be alone with a youth or may make unauthorized stops with youths. In addition, transportation activities may provide a time for unsupervised youths to engage in youth-to-youth sexual activity.

The transportation guidelines:

- a. Require written parent permission from all youths on the trip. Staff take these permission forms and medical releases with them on the trip.
- b. Staff are required to have a list of the youths on the trip. The staff take roll when boarding the bus, when leaving the bus, periodically throughout the trip, and then

- again when boarding the bus, and again when the bus returns to its final destination.
- c. Staff-to-youth ratios are maintained. The driver is not counted in the supervision ratio.
- d. Staff are required to sit in seats that permit maximum supervision.
- e. Discourage mixed age groups or developmental levels from sitting together. When possible, high-risk members are seated by themselves or near an employee.
- f. Prohibit drivers from making unauthorized stops.
- g. Where applicable staff are required to document the beginning and ending time of the trip and the mileage, names of the youths being transported, and the destination.
- h. Documentation is required of any unusual occurrences.
- i. Staff are not permitted to transport youths in non-organization vehicles.
- j. Use the "rule of three" when transporting members: At least two employees must transport a single member, or at least two members must be present if transported by a single employee.
- k. Members may not be brought to the employee's home or the home of any employee's family member.

For adult members:

- Adult members (i.e., individuals with disabilities, those experiencing homelessness, or other adult participants in general programming) also require effective monitoring and supervision practices to prevent inappropriate member-to-member interactions. Employees, volunteers and third-party persons should provide line of sight supervision, structured or guided activities, designated or authorized program areas they may access, and observations of red flag or inappropriate behaviors to deter and intervene on inappropriate adult member interactions.

8. Supervising off-site activities include:

Special guidelines for off-site activities, field trips, and outings include:

- Visit the destination in advance, when possible, to assist with planning.
- Require prior supervisor approval for all off-site activities.
- Require written parental/guardian approval by disseminating permission slips, including rules for members to follow, prior to each off-site activity. Employees and volunteers should keep permission slips on hand during the activity.
- Determine appropriate employee/volunteer-to-member ratios before the activity and schedule employees and volunteers accordingly. Considerations for ratios should include:
 - age and number of members involved
 - special or unique member needs
 - the nature of the activity
- Require employees, volunteers, third party people and members to be easily identifiable (using lanyards, badges, shirts, etc.).
- Review rules and boundaries with members prior to the activity, including how to report concerns.
- Assign each employee or volunteer to a specific group of members to supervise. Groups should be separated according to age, gender, and/or behavior of consumers.
- Employees and volunteers are trained on active supervision techniques:
 - Position themselves to be able to see and hear all members to whom they are assigned.
 - Anticipate what members will do and redirect when necessary.
 - Listen and notice changes in sound or absence of sound.

- Remain engaged with members rather than socializing with other employees or volunteers.
- Each employee or volunteer must maintain a roll sheet listing all the members in his or her group. Name-to-face roll checks should be conducted routinely and whenever moving from one activity or space to another.
- Follow specific bathroom and locker room procedures for employees and volunteers as applicable to the outing, ensuring minimum ratios can be always maintained.
- Prepare a means for employees and volunteers to communicate with each other while off-site.
- Employees and volunteers are prohibited from using cell phones for personal business while supervising consumers.
- Be aware of an emergency plan for responding to incidents off site.
- Follow instructions for documentation including the purpose of the activity, duration, location, and other critical information.
- Follow instructions for a supervisor to observe the off-site activities at scheduled times and random intervals.
- Consider utilizing a shared calendar for awareness among teams for various community or home-based service deliveries
- Consider specific recommendations based on the location and type of activity (for example, amusement parks, water parks, arcades, etc.). If the trip is to a location where members will be interacting in a large space and/or it is not possible to assign specific employees and volunteers to specific groups of consumers, then:
 - Set boundaries at the location. Tell members where they may and may not go. Then post employees and volunteers around the boundaries and at the entrance and exit points.
 - Assign remaining employees and volunteers to monitor specific areas. Post at least one employee or volunteer near the bathrooms.
 - Members should check in at designated meeting points at least once every hour.

9. Overnight Activities

Overnight stays present unique risks to youths and staff. They often involve changing clothes, groups of both genders and different ages in a more intimate atmosphere than usual, more unstructured activities, and increased supervision demands for staff.

Supervision Guidelines:

- a. All overnight activities must be documented and approved in writing.
- b. Parents and/or their designee (other than staff) are responsible for youth.
- c. Administrators are expected to regularly and randomly observe overnight activities on a scheduled and periodic basis.
- d. All parents must sign a permission slip for their youths to attend overnight.
- e. Meetings with the group should be hosted in open and observable areas; meetings should not be hosted in staff or youth rooms.

Overnights Away from the Facility:

- a. Overnight stays at private homes are prohibited unless approved by the administration.
- b. Physical boundaries at the off-site location must be clearly defined and explained to the youths.
- c. In hotel rooms, assign youths to rooms based on sex and age. Staff must have their own rooms.

- d. Parents and/or their designee (other than staff) are responsible for youth during the overnight stay.

10. Monitoring & Supervising Aquatic Programs

Aquatics programs are considered "high risk" as they can quickly provide opportunity for both adult-to-member abuse as well as member-to-member abuse. To ensure efficient monitoring and supervision of aquatics programs, and in addition to training our employees & volunteers, our organization follows supervision procedures in the below areas:

- a. Monitoring suspicious or inappropriate behavior in the water, it is important to watch for, and respond to, these red flag behaviors in adults:
 - Violating your organization's policies regarding appropriate and inappropriate physical interactions with members (for example, piggyback rides in the water, allowing members to hang on them in the water, etc.)
 - Loitering during member-only lessons or activities
 - Watching a member or group of members for an extended period
 - Inappropriate sexual behavior and/or activity by an adult

It is important to watch for, and respond to, these red flag behaviors in members:

- Seeking out unsupervised areas
- Inappropriate physical contact with other members (i.e. horseplay, "chicken fights," and dunking)
- Members who appear to be uncomfortable with the attention they are receiving from an adult or another member.
- Inappropriate physical contact out of view (i.e. underwater or in a slide)

- b. Monitoring locker rooms, changing areas, and bathrooms

Employees should look for red flags, suspicious or inappropriate behaviors in locker rooms, changing areas, and bathrooms, including:

Adults:

- Loitering in the locker room
- Watching/staring at consumers in the locker room
- Making inappropriate comments to the consumers in the locker room

Members:

- Members seeking out unsupervised areas
- Mixed age groups of members
- Making inappropriate comments to other members in locker rooms, changing areas, and bathrooms.

- c. Monitoring during swimming lessons

- Ensure instructors teach swimming lessons in open, viewable swimming areas under the supervision of other employees.
- Monitor for interactions with members that are following your organization's guidelines for appropriate and inappropriate physical interactions.
- Instructors are required, when possible, to keep their hands above water and visible to others.
- Instructors are required, when assisting a child during the lessons, to explain out loud where they will touch the child – "I am going to put my hand under your back to help you float."
- When possible, encourage parents/guardians to observe swimming lessons.

- d. Monitoring the pool deck and any lounge areas
 - Ensure all entrances and exits to the pool deck are appropriately and regularly monitored.
 - Designate specific employees responsible for monitoring the pool deck and lounge areas (other than lifeguards). Active supervision of these areas is always critical.
 - Monitor members to ensure they are following your organization's guidelines for appropriate interactions (including physical interactions, verbal interactions and electronic communications).
 - Have a plan of action for responding to any deck changing (individuals changing on the pool deck and not in the appropriate locker room or changing area).

11. Monitoring and Supervising Youth Sports Programs

To ensure safety and quality in the various youth sports programs, practices must be monitored and evaluated by a full-time employee who is familiar with policies and procedures.

Keep a record. Document your supervision visits. Include information like your arrival and departure times, which youth and parents/guardians were present, and a summary of the information collected. Provide employees with feedback about visits.

Vary your observation times. Do not develop a predictable pattern of observation. Drop in at different times each day. Occasionally leave and come back immediately.

Arrive before employees. Check punctuality and the routine that employees follow to prepare for the youth to arrive.

Survey the physical environment. Is this a suitable location for the activity (e.g. size of area for number of youths, ability to supervise all areas used by youth, landscaping that may inhibit supervision)?

Watch activities. Are they planned and organized? Are the employees actively involved? Ask to see the schedule of activities and compare with what is going on at a given time.

Observe bathroom and locker room activities. Observe bathroom and locker room activities to ensure that the employees are complying with the established policies and procedures.

G. Supervisors and Administrators Monitoring On-Site and Off-Site Programs

Our supervisors and administrators are required to conduct scheduled and random observations of all programs, program locations and buildings; engage in spontaneous and scheduled conversations with employees, volunteers, and youth; conduct group and individual supervision and training meetings; and review program documentation, to ensure that safety standards are always in place. Unused spaces should be locked and inaccessible to members and staff.

Keep a record. Document your supervision visits. Include information like your arrival and departure times, which youths and parents were present, and a summary of the information collected. Provide staff with feedback about visits.

Vary your observation times. Do not develop a predictable pattern of observation. Drop in at different times each day. Occasionally leave and come back immediately.

Arrive before staff. Check punctuality and the routine that staff follow to prepare for the youths to arrive.

Survey the physical environment Is this a suitable location for the activity (e.g. size of area for number of youths, ability to supervise all areas used by youths, landscaping that may inhibit supervision)? Are there architectural areas blocking supervision? If so, schedule a staff member to visually observe these areas.

Watch activities. Are they planned and organized? Are the staff actively involved? Ask to see the schedule of activities and compare with what is going on at a given time.

Observe bathroom and locker room activities. Observe bathroom and locker room activities to ensure that the staff are complying with the established policies and procedures.

Observe Interactions.

- Observe employees, volunteers’ and third-party people’s interaction with youth.
- Observe employees and volunteers’ and third-party people’s interactions with each other.
- Observe employees and volunteers’ and third-party people’s interactions with parents/guardians.
- Ask parents/guardians questions, such as:
 - Are you satisfied with the care your child is receiving here?
 - What can we do to make it better?
 - Does your child ever say anything about his or her (title of employees and volunteers)?
- Ask employees and volunteers how they would respond to “what if” situations that you describe, such as:
 - A youth is not picked up by a parent/guardian at the end of the program
 - Another employee or volunteer shakes a youth for hitting another youth

H. Policy Governing Member Discipline

This organization will establish age and developmentally appropriate expectations and behavioral guidelines for members. To the extent that discipline of a member is warranted, this organization will apply discipline in a professional, fair, and consistent manner. Employees or volunteers engaging in any discipline beyond verbal redirection should document the behavior and disciplinary method. This organization retains the option to exclude participants from future programs based on disciplinary issues. In all cases, employees and volunteers are prohibited from using physical contact for disciplinary purposes. This prohibition includes spanking, slapping, pinching, hitting, or any other physical force as retaliation or correction for inappropriate consumer behaviors.

Below are some examples of appropriate and inappropriate disciplinary practices:

Appropriate Discipline Practices	Inappropriate Discipline Practices
• Develop rules and consistently enforce them • Remain calm but firm • Remind consumers of appropriate actions • Address the consumer’s behavior, not the character of the consumer • Loss of privileges • Consider program or activity restrictions, such as sitting out or suspension	• Hitting • Spanking • Shaking • Slapping • Using extreme or unreasonable (in length or type) physical exercise as a consequence. • Withholding food, light, or medical care • Name-calling • Shoving or pulling hair or ears • Biting • Pinching • Shaming • Derogatory remarks • Ostracizing • Mechanical tape or rope restraints • Angry yelling directed at the consumer

V. INTERNAL FEEDBACK SYSTEMS

A. Grievance Policy

This organization believes employees and volunteers have valuable thoughts and insights to share regarding the workplace and our operations. Accordingly, this organization encourages employees and volunteers to share opinions, suggestions, concerns, questions and/or grievances about our policies,

personnel issues, and/or other workplace matters and the organization.

In general, the best person initially to bring opinions, suggestions, concerns, and/or questions to is the employee's or volunteer's direct supervisor. However, to the extent the concerns relate to his/her direct supervisor, or to the extent an employee believes his/her direct supervisor

did not fully address a matter, employees and volunteers may direct their opinions, suggestions, concerns, and/or questions to the next level of management or directly to the Branch Director.

B. Written Complaint Requirements

Verbal complaints are encouraged, particularly for issues that may be easily and expeditiously resolved, but a written complaint is required to initiate this grievance process. To ensure a timely and effective response, complaints should include the following information to the extent possible:

- 1) The name(s) of employee(s) involved;
- 2) The date(s) the behavior occurred;
- 3) The name(s) of any known witness(es);
- 4) A summary of the conduct meriting the grievance including:
 - a. The behavior complained of and/or the alleged policy or legal violation(s);
 - b. Direct quotes when relevant and available; and
 - c. Any relevant documentation.
- 5) The remedy sought by the employee/volunteer making the complaint.

C. Timeline

- Employees/Volunteers who themselves have a complaint against another employee who are aware of employee behavior meriting a complaint, must provide the above described written complaint via email to their direct supervisor or Branch Director.
- The direct supervisor or Branch Director will meet with the employee/volunteer to hear their concern and attempt to resolve the complaint within 10-15 business days.
- Following that meeting, the direct supervisor or Branch Director will provide a written response to the employee/volunteer who brought the complaint no later than 10-15 business days, that includes brief written findings on the issues raised and relief sought.
- If the employee/volunteer is not satisfied with the written response, the employee/volunteer who brought the complaint may submit an appeal to the Chief People Officer no later than 10-15 business days.
- The Chief People Officer will meet with the employee/volunteer to hear their concern and attempt to resolve the complaint within 10-15 business days.
- Following that meeting, the Chief People Officer will provide a written response to the employee/volunteer who brought the complaint no later than 10-15 business days, that includes brief written findings on the issues raised and relief sought.
- The CEO is the final arbiter of grievance matters at this organization.

D. Investigation

- The direct supervisor, and/or Branch Director will thoroughly investigate the issues raised in the grievance and will protect the privacy and confidentiality of all parties involved to the extent possible by law.
- All employees must cooperate with the investigation.
- If the organization determines a violation of policy or law has occurred, the organization will take appropriate disciplinary action, up to and including termination.

E. Retaliation

This organization strictly prohibits retaliation against employees/volunteers for reporting, filing, testifying, assisting or participating in any manner in any investigation, proceeding or hearing conducted by the organization or a federal or state law enforcement agency or court.

Employees/volunteers should report any suspected retaliation to their direct supervisor or another supervisory level employee immediately after becoming aware of it. Any report of retaliatory conduct will be objectively, timely and thoroughly investigated. If a report of retaliation is found to be valid, the organization will take appropriate remedial action, up to and including discharging the employee(s) responsible. This organization will not retaliate against any employee for raising a complaint and will not knowingly permit retaliation by management or other employees.

F. Policy Requiring Confidentiality of Reports

This organization will protect the confidentiality of anyone who reports allegations or disclosures of abuse, or other violations of law or policy to the extent possible under law.

Legal and civil authorities (police, child or adult protective services) may require confidential information to investigate any report of illegal conduct but this does not eliminate the requirement to maintain confidentiality within the organization and its employees, volunteers, third-party people and members.

The organization will provide written communication of any changes to this policy to all employees, volunteers, third party agencies, members, and parents/guardians.

G. Policy for Follow-Up with Individuals who Report Concerns or Complaints

This organization is committed to creating a safe environment for our employees, volunteers, third party people, and especially our members and their parent/guardians. For that reason, we will treat every concern or complaint with the utmost seriousness and provide a timely, thorough, and objective response in every instance. When an individual shares a concern or complaint:

1. They will be given the time and attention necessary to allow them to share their thoughts in person.
2. They will be thanked for sharing their concerns with the organization and for contributing to maintaining a healthy and safe environment for everyone.
3. They will be advised that their concern is being taken seriously and that action will be taken.
4. They will be reassured that they have done the right thing by reporting and that their communication is valued.
5. They will be informed, in general statements, of the steps that the organization will take in addressing the matter.

6. They will be given contact information for someone in the organization with whom they can contact should they become aware of additional information.
7. They will be provided regular updates of how the process is advancing.
8. The organization will protect them from any form of retaliation.

H. Policy for an Anonymous Reporting Mechanism for Employees, Volunteers, and Third-Party Persons

While we hope that our employees, volunteers and third-party people feel that they can openly communicate any concerns, complaints, or grievances directly to someone in the organization, we understand that doing so can often be difficult. Because it is important to us that everyone be able to share their concerns, we provide the following mechanisms through which you can make an anonymous report:

The following is a list of anonymous reporting methods.

2. Refer to the CYEDC website for resources and reporting information.
3. Praesidium's Helpline you can reach at 855-347-0751.

Please keep in mind that our ability to respond quickly and adequately may be affected if the information provided is limited. However, we are committed to responding to all anonymous concerns to the extent possible.

I. What is the Praesidium Helpline?

The Praesidium Helpline is a consultation line anyone in the organization can call to discuss observations of inappropriate behaviors, suspicious behaviors, policy violations, instances of member-to-member sexual activity, and any other abuse prevention questions and issues.

III. Responding

As required by mandated reporting laws, employees, volunteers and third-party persons working with youth or vulnerable adults must report any suspected abuse or neglect of a member—whether on or off organization property or whether perpetrated by employees, volunteers, or others—to state authorities. Reports may be made confidentially or anonymously. A person who mistakenly reports suspected abuse is immune from civil or criminal liability if the report was made in good faith and without malice. If you need more information on your state's specific reporting requirements, please visit the [Child Welfare](#) website.

In addition to reporting to state authorities, employees, volunteers, and third-party people are required to report any suspected or known abuse of members perpetrated by employees, volunteers, third party persons or other members directly to leadership so that immediate and proper steps may be taken to ensure the safety of alleged victims and others who may be at risk. Reports of suspected or known abuse may be made confidentially to the following:

1. Immediate supervisor
2. Directors
3. Administrators

A. Policy Requiring Reporting of Red-Flag or Inappropriate Behaviors and/or Policy Violations

Our organization has zero tolerance for abuse. It is imperative that every employee, volunteer and third-party people actively participate in the protection of members.

If employees or volunteers observe red-flag or inappropriate behaviors and/or policy violations by other employees or volunteers, it is their professional and personal responsibility to immediately report their observations in accordance with the organization's reporting procedures.

Remember, at our organization, the policies apply to everyone.

The following are examples of red-flag or inappropriate behaviors that all employees, volunteers and third-party people are required to report:

- Any violation of the organization's abuse prevention policies
- Seeking unauthorized private time or one-on-one time with consumers
- Seeing or visiting with a consumer outside of scheduled programing
- Buying gifts for individual consumers
- Sending unauthorized electronic communications through text messaging, social media, online gaming, etc. in violation of the organization's electronic communication policy
- Making suggestive comments to consumers
- Showing favoritism towards a consumer or type of consumer
- Consumers disclosing that an employee or volunteer makes them feel uncomfortable

All reports of suspicious or inappropriate behavior with consumers will be taken seriously. Our procedures will be carefully followed to ensure that the rights of all those involved are protected.

If employees or volunteers witness suspicious or inappropriate behaviors or policy violations from another employee or volunteer, the individual is instructed to do the following:

- Interrupt the behavior.
- Report the behavior to a supervisor, director, or other authority.
- If you are not comfortable making the report directly, make it anonymously
- If the report is about a supervisor or administrator, contact the next level of management.
- Complete an internal report but do not conduct an investigation.
- Keep reporting until the appropriate action is taken.

B. Supervisor and Administrator Response to Red-flag or Inappropriate Behaviors and/or Policy Violations

If a supervisor or an administrator receives a report of suspicious or inappropriate behaviors or policy violations from an employee, volunteer, third party person, member, or parent/guardian, the supervisor is instructed to do the following:

- Report to the next level supervisor or administrator.
- Speak with the employee or volunteer who has been reported.
- Review the file of the employee or volunteer to determine if similar complaints were reported.
- Determine the appropriate response based on the report.
 - i. Take into consideration factors such as:
 1. Context of red-flag or inappropriate behavior or policy violation.
 2. Severity of red-flag or inappropriate behavior or policy violation.
 3. History of red-flag or inappropriate behaviors or policy violations; and
 4. Trainability of employees or volunteers.

- Document the report on the appropriate form.
- If at any point in gathering information about a report of red-flag or inappropriate behavior, a concern arises about possible abuse, contact the state authorities and file a report.
- If appropriate, notify parents/guardians.
- Advise the person who reported the behavior that the report is being taken seriously. Based on the information gathered, the following may be required:
- Increase monitoring or supervision of the employee, volunteer, and/or program.
- If policy violations with member(s) are confirmed, the employee or volunteer must be subject to disciplinary action up to and including termination and prosecution. Disciplinary action will follow the Progressive Disciplinary Process outlined by the organization.
- If more information is needed, interview and/or survey other employees and volunteers or Members.

C. Policy Allowing Suspension for Employee Misconduct

Organizations are often faced with the difficult decision of determining what action to take when an employee is the subject of allegations of misconduct and/or abuse that require an investigation. The employee's status during the investigation will depend upon the nature of the misconduct and the employee's position.

This organization will use the following question to determine the propriety of the employee's continued presence at our organization after an allegation of misconduct or abuse has been made and/or during an investigation for misconduct or abuse:

Is the continued presence of the employee likely to create a danger to employees, volunteers, and/or consumers or otherwise be disruptive, detrimental to morale or good order, or an embarrassment to the employer?

1. If the organization, using all evidence available to guide decision making, determines there is no risk, the employee should remain in the workplace.
2. If the organization, using all evidence available to guide decision making, determines risk does exist but can reasonably be avoided by temporarily reassigning the employee to an available position, the organization should make the effort to do so.
3. If the organization, using all evidence available to guide decision making, determines risk is present and cannot be avoided by reassignment, or where an appropriate position is not available, an indefinite suspension or administrative leave should be used until the resolution of the matter.

This organization will communicate any decision to suspend or place an employee on administrative leave in writing. The written document announcing suspension or administrative leave must be shared with the employee, consistent with the requirements set forth in the organization's progressive discipline policy for written discipline, and a copy must be placed in the employee's personnel file.

D. Procedures for Employee, Volunteer, Third Party Persons Response to Allegations or Incidents of Abuse

As required by mandated reporting laws, employees, volunteers and third-party people working with youth must report any suspected abuse or neglect of a member—whether on or off organization property or whether perpetrated by employees, volunteers, or others—to state authorities. Reports may be made confidentially or anonymously. A person who mistakenly reports suspected abuse is immune from civil or criminal liability if the report was made in good faith and without malice. If you are in need of more information on our state's specific reporting requirements, please visit the [Child Welfare](#) website.

In addition to reporting to state authorities, employees, volunteers third parties are required to report any suspected or known abuse of a member perpetrated by employees, volunteers or third-party persons directly to leadership so that immediate and proper steps may be taken to ensure the safety of alleged victims and others who may be at risk. Reports of suspected or known abuse may be made confidentially to the following:

1. Immediate supervisor
2. Directors
3. Administrators

Additional guidelines for employee and volunteer response to incidents or allegations of abuse:

- If you witness abuse, safely interrupt the behavior immediately.
- If abuse is disclosed to you, assure the individual disclosing that he or she was correct to tell you.
- Protect the alleged victim from intimidation, retribution, or further abuse to the extent possible.
- Immediately report the allegation or incident to the proper organization authorities (based on mandatory reporting requirements) and the designated authority.
- Be sure to document the incident, disclosure, or any circumstances causing your suspicion of abuse according to incident reporting and documentation requirements. State only the facts.
- It is not your job to investigate the incident, but it is your job to report the incident to your supervisor in a timely manner.
- Check back to make sure appropriate steps were taken. If not, report again to your supervisor or the designated organization authority.

E. Procedure for Supervisors and Administrators Responding to Allegations or Incidents of Abuse

As required by mandated reporting laws, employees, volunteers and third-party people working with youth & vulnerable members must report any suspected abuse or neglect of a consumer—whether on or off organization property or whether perpetrated by employees, volunteers, or others—to state authorities. Reports may be made confidentially or anonymously. A person who mistakenly reports suspected abuse is immune from civil or criminal liability if the report was made in good faith and without malice.

Guidelines for supervisors and administrators responding to allegations or incidents of abuse:

- First, determine if the member is still in danger and if so, take immediate steps to prevent any further harm.
- If receiving reports from employees, volunteers, or third-party persons, be sure to verify they have followed mandated reporting requirements or will follow immediately after making internal report.
- Report to any applicable external licensing or governing bodies.
- Gather as much information about the allegation as you can. For example, who made the report, who was allegedly abused, who was the alleged abuser, what was the nature of the alleged abuse, where and when did the alleged abuse occur, etc.
- Accurately record everything you learn in as much detail as you can. Remember your notes may be read by others. Stick to the facts.
- Contact the appropriate local authorities as indicated by your mandatory reporting procedures. Make sure you get a case number and the name and contact information of the person with whom you speak at the reporting agency.
- If the alleged abuse involves an employee or volunteer, notify your crisis management team and follow your crisis management plan.
- Suspend the accused employee or volunteer until the investigation is completed.

- Ensure that consumer's parents/guardians are notified (when applicable).
- Deploy communication plan.
- Provide resources for victims, families, and other stakeholders.

F . Procedure for Employee and Volunteer Responding to Member-to-Member Sexual Activity

Member-to-member sexual behaviors can include inappropriate touching, exposing body parts, using sexualized language, making threats of sexual activity, engaging in sexual activity, and similar types of interactions.

If employees or volunteers witness member-to-member sexual behaviors that are contrary to defined behavioral expectations between members, they are instructed to follow these guidelines:

- If you observe sexual activity between members, you should safely separate them as soon as possible.
- Calmly explain that such interactions are not permitted and separate the members.
- Notify your supervisor and parent/guardian (when applicable)
- Complete the necessary documentation including what you observed and how you responded.
- Follow your supervisor's instructions regarding notifying the authorities and informing the parents/guardians of the consumers involved.
 - i. Do not attempt to determine whether the member's behavior was "sexual curiosity". There is not a standard definition of what normal sexual curiosity looks like. An external body, such as law enforcement, utilizes criterion to investigate and determine whether the member's behavior is sexual curiosity.
- If the problem is recurring, additional action may be required including not allowing one or both members to return to the program.
- Identify how members will be managed or supported to prevent further occurrences of sexual activity (i.e., safety or behavioral plans including additional supervision requirements)

G. Policy Requiring Notification of Arrest or Conviction

Any employee or volunteer who, subsequent to their engagement with our organization, is arrested for, or convicted of (including pleas of guilty and nolo contender), a misdemeanor or felony offense must notify their supervisor within 72 hours of an arrest or conviction. Supervisors must immediately notify the organization's Human Resources department who will notify legal counsel.

Employees and volunteers need not report convictions for routine traffic infractions such as speeding unless driving is a required part of the employee or volunteer's job duties.

The arrest or conviction of an employee or volunteer may result in corrective action.

Corrective action depends upon a review of all factors involved - including whether the crime was work-related, the nature and severity of the act, or any resultant circumstances that adversely affect the employee or volunteer's ability to function in their role. Such corrective actions may include termination. Corrective action may only be taken after consultation with the organization's legal counsel.

Any employee or volunteer's failure to report an arrest or a conviction for a misdemeanor or felony within 72 hours, or misrepresentation of the circumstances of an arrest or conviction, will result in disciplinary action up to and including termination. Volunteers and independent contractors who fail to disclose an arrest or conviction after their engagement with our organization will have their relationship terminated immediately.

IV. Training

The YMCA recognizes the importance of providing training and professional development activities that relate to our employee and volunteer roles and responsibilities. Examples of training and professional opportunities offered by the YMCA include but are not limited to eLearning, workshops, courses, classes, and professional conferences.

Annual abuse prevention training serves as a refresher for previously learned concepts and provides additional knowledge and skills to enhance the ability of employees and volunteers to protect youth. All employees and high-access volunteers are responsible for annually completing training on the following concepts:

- The YMCA's up-to-date policies related to preventing and responding to abuse.
- How to maintain appropriate boundaries with youth; and
- Additional topics that contribute to employee and volunteers' skills and knowledge related to abuse prevention. These may vary according to an employee's role within the YMCA.

The YMCA keeps documentation of training records for all employees and high-access volunteers. Failure to complete the required training will result in disciplinary actions up to and including termination or removal from the YMCA.

Supervisors and Administrators must be trained in supervisory training courses that incorporate the following topics:

- Abuse risk management
- Supervisor's role in abuse prevention
- Strategies to reduce risk
- Importance of having increased presence and observations of programs
- Using teaching moments in supervision

This organization requires all employees and high-access volunteers to sign a statement of acknowledgement and compliance with all organizational policies upon hire and repeated annually.

Supervisors and managers involved in the hiring process must complete training on the following topics:

- Importance of Screening & Selection
- Managing YMCA

Acknowledgement of Policies, Code of Conduct, or Standards

All employees and volunteers with access to consumers shall confirm that they have read and agree to comply with the organization's abuse prevention policies, Code of Conduct, and consumer protection standards by signing a written acknowledgment upon hire and annually thereafter.

The organization shall ensure that all employees and volunteers have signed a written acknowledgment upon hire and annually thereafter by keeping signed acknowledgement forms in personnel files.

THIS IS TO ACKNOWLEDGE THAT I HAVE RECEIVED A COPY OF THE ABUSE PREVENTION GUIDELINES, which supersedes any other policy I may have received during my interactions with members as a third-party agency, volunteer service or employment with CYEDC. I understand that these Guidelines are intended to serve as a guide to The CYEDC's policies and procedures, and that policies and procedures described in these Guidelines are always subject to modification at any time with or without notice by The CYEDC.

I acknowledge that I have read the information herein and understand that it describes policies which govern my employment or other position in CYEDC programs. I also understand that my volunteer service or employment is at-will, which means that it is for no set period and may be terminated by me or The CYEDC at any time with or without cause. Nothing shall have the effect of changing the at-will status of my volunteer service or employment other than a written agreement signed by me and the President/CEO of The CYEDC specifically changing the status.

Date: _____

Employee/Volunteer/Third Party Name: (please print) _____

☐ *By checking this box and typing my name below, I am electronically signing this document.*

Employee/Volunteer/Third Party Signature: _____

This form will become part of your personnel/volunteer/Third Party Agency file.