



## AYCC Policies for Protection of Youth

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## **Introduction**

The Alford Youth & Community Center, representing the Boys & Girls Clubs and YMCA of Greater Waterville, prioritizes the safety of youth following guidance from the Boys & Girls Clubs of America, the YMCA of the USA, insurance providers, local safety officials, and Board Lead Safety Committee. This document provides policies that protect youth and staff across AYCC youth serving programs.

Additional policies and procedures addressing general member and employee safety can be found in the AYCC Member Handbook and the AYCC Employee Handbook.

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## **Child Abuse Prevention Policy**

The priority of the Alford Youth & Community Center (AYCC) is the physical and emotional safety of its members, staff and volunteers. The AYCC maintains a zero-tolerance policy for child abuse. AYCC implements policies and procedures for members, employees, volunteers, visitors or any victims of sexual abuse or misconduct to report any suspicion or allegation of abuse.

### **DEFINITIONS**

**One-on-Contact Prohibition:** The AYCC prohibits isolated one-on-one interaction between youth participants and staff or volunteers, including board members. This includes prohibiting one-on-one contact at any time at the AYCC, in vehicles or by phone, text, social media or any other means. Exceptions may only be made when delivering approved medical or counseling services by a licensed, trained therapist or similar professional according to professional guidelines. All staff and volunteers, including minor staff (under age 18), are strictly prohibited from meeting Youth participants outside of any AYCC-sponsored activities. The only exception to this rule is if the AYCC participant is a child or sibling of a staff member or volunteer.

**Child abuse** is when an adult or another child, whether through action or by failing to act, causes serious emotional or physical harm to a child. Sexual abuse or misconduct may include but is not limited to:

- Any sexual activity, involvement or attempt of sexual contact with a person who is a minor (under 18 years old).
- Sexual activity with another who is legally incompetent.
- Physical assault or sexual violence, such as rape, statutory rape, abuse, molestation, or any attempt to commit such acts.
- Unwanted and intentional physical conduct that is sexual in nature, such as touching, pinching, patting, brushing, massaging someone's neck or shoulders and/or pulling against another's body or clothes.
- Inappropriate activities, advances, comments, bullying, gestures, electronic communications or messages (e.g., by email, text, or social media).

**Grooming** is when someone builds an emotional connection with a child to gain their trust for the purposes of sexual abuse, sexual exploitation or trafficking. Grooming behaviors may include but are not limited to:

- Targeting specific youth for special attention, activities or gifts.
- Isolating youth from family members and friends physically or emotionally. This can include one-on-one interactions such as sleepovers, camping trips and day activities.
- Gradually crossing physical boundaries, full-frontal hugs that last too long, lap sitting or other "accidental" touches

### **MANDATED REPORTING**

Every staff member or volunteer of the AYCC who becomes aware of or has suspicion of child abuse or neglect must immediately report to AYCC leadership. AYCC leadership is responsible for reporting the incident immediately to the appropriate authorities according to statewide mandated reporting laws, as well as to Boys & Girls Clubs of America (BGCA) within 24 hours via the critical incident system.

### REQUIRED TRAINING

The AYCC conducts and reports through a Maine DHHS & BGCA-approved process the following training for all staff members and volunteers with direct repetitive contact with young people.

#### Before providing services to young people, and annually thereafter:

1. BGCA-approved child abuse prevention
2. BGCA-approved mandated reporting
3. BGCA-approved grooming prevention

#### Annually:

- All the policies, including all safety policies, for the AYCC.

### PHYSICAL INTERACTIONS

Every staff member and volunteer of the AYCC is required to maintain appropriate physical contact with minors. Appropriate and inappropriate interactions include but are not limited to the following:

Appropriate	Inappropriate
<ul style="list-style-type: none"><li>• Side hugs</li><li>• Handshakes</li><li>• High-fives and hand slapping</li><li>• Holding hands (with young children in escorting situations)</li></ul>	<ul style="list-style-type: none"><li>• Full-frontal hugs or kisses</li><li>• Showing affection in isolated area</li><li>• Lap sitting</li><li>• Wrestling or piggyback/shoulder rides</li><li>• Tickling</li><li>• Allowing youth to cling to an adult's leg</li></ul>

### VERBAL INTERACTIONS

Every staff member and volunteer of the AYCC is required to maintain appropriate verbal interactions with minors. Appropriate and inappropriate interactions include but are not limited to the following:

Appropriate	Inappropriate
<ul style="list-style-type: none"><li>• Positive reinforcement</li><li>• Child-appropriate jokes (no adult content)</li><li>• Encouragement</li><li>• Praise</li></ul>	<ul style="list-style-type: none"><li>• Name calling</li><li>• Inappropriate jokes (adult-only content)</li><li>• Discussing sexual encounters or personal issues</li><li>• Secrets</li><li>• Profanity or derogatory remarks</li><li>• Harsh language that may frighten, threaten or humiliate youth</li></ul>

### ABUSE AND SAFETY RESOURCES

The AYCC prominently displays BGCA-approved collateral that shares ethics hotline, crisis text line and safety helpline information with members, staff, volunteers and families. We also share all safety policies with parents and guardians upon receiving a youth membership application.

## **Prohibition of Private One-on-One Interaction Policy**

The AYCC is committed to providing a safe environment for members, staff, and volunteers. To further ensure their safety, the organization prohibits all one-on-one interactions between youth and staff / volunteers (including board members). All staff and volunteers must abide by the following:

- Ensure all meetings and communications between youth members and staff or volunteers are never private (see definition below).
- Ensure in-person meetings take place in areas where other staff and/or members are present.
- Communicate to another staff member whenever an emergency arises that necessitates an exception to this policy.
- Never initiate private or isolated one-on-one contact with a youth member.
- Never have a private or isolated meeting or communication with a youth member. This includes in-person meetings and virtual communications such as texting, video chat and social media between only a staff member or volunteer and a single member.
- Never transport one youth member at a time. This includes transportation in AYCC or leased vehicles.

Exceptions may only be made when delivering medical or counseling services by a licensed, trained therapist or similar professional. All exceptions shall be documented and provided to AYCC leadership in advance.

If an emergency arises that necessitates an exception to this policy, the emergency exception shall be communicated to AYCC leadership as soon as practicable, and ideally before engaging in one-on-one interaction.

### **ONE-ON-ONE INTERACTION POLICY GUIDANCE**

The following guidance should be used when implementing related policies and procedures.

#### **Definition of one-on-one interaction**

One-on-one interaction is defined as any private contact or communication (including electronic communication) between any youth participant and an adult, including adult staff, minor staff, volunteers, board members and others who might encounter members during regular programming and activities.

- Private contact/communication is any communication, in person or virtual, that is between one youth member and one adult (18 or over) that takes place in a secluded area, is not in plain sight and/or is done without the knowledge of others. Private places can include but are not limited to vehicles, rooms without visibility to others, private homes, and hotel rooms. Examples of private contact include but are not limited to:
  - Meeting behind closed doors (in rooms without windows or visible sightlines) or any spaces that are not visible to others.
  - One staff member transporting one member in a vehicle.
  - Electronic communications (text, video, social media, etc.) between one member and one staff member or volunteer.
- Public contact/communication is any communication or meeting, in person or virtual, that is between at least three individuals, including two staff and one member, one staff and two

members or variations of these combinations. Examples of public contact include but are not limited to:

- Meeting in plain sight of others (e.g., in a quiet corner of an active games room).
- Transporting members via public transportation (bus, taxis, train, air, etc.) or transporting multiple members.
- Electronic communications (text, video, social media, etc.) between multiple members and adults (e.g., group chats).
- Public places can include but are not limited to buses, airports, shopping malls, restaurants, and schools.

#### **Impact on mentoring programs**

Mentorship is a key component of AYCC programming and has tremendous positive impact on members. Prohibition of one-on-one interaction does not have to negatively affect mentor programs and/or relationship building. Mentors can adjust their practices to include:

- Holding mentor and coaching sessions in areas where other staff and/or members are present or can see you – for example, in large rooms where meetings are visible but not heard.
- Copying parents, staff, or other members (when appropriate) on written and/or electronic communications.
- Scheduling meetings during AYCC hours and at the AYCC sites.
- Documenting interactions between mentors and youth.

#### **Impact on partnerships with local mentoring organizations**

- All local mentors are required to abide by AYCC policies, including background check requirements and prohibition of one-on-one interaction.
- External mentors are required to abide by all AYCC safety policies and procedures.
- A written agreement should be in place to determine how and when the external organization assumes custody and responsibility of the member; these procedures should be clearly communicated to parents or guardians.
- Every interaction between mentor and youth will be documented and maintained

#### **Impact on travelling to off-site events and activities**

- When travelling to external / off-site events, the one-on-one policy shall continue to be followed.
- Should the AYCC take responsibility for transporting members to and/or from an event, one staff member should not transport one single child at any time in a vehicle. Accommodations shall be made to ensure at least three people (two staff and one member or one staff and two members) are together when traveling. As an alternative, public transportation may be used (e.g., taxi, Uber, public transport).
- If this arrangement presents staffing or budget challenges, consider the following:
  - Inviting parents or guardians to attend and/or chaperone their child.
  - Including additional youth and/or staff in travel plans.
  - Coordinating with other/nearby organizations to travel together.
  - Travelling with additional staff or members.

- Parents and guardians should also provide written consent in each instance in which a member travels to any off-site event. NOTE: Parents or guardians are never allowed to provide consent for one-on-one interaction.
- Similar practices should be in place when coordinating field trips.

**Impact on transportation to and from the AYCC**

- When transporting members to and/or from a AYCC-sponsored event or activity, single members should not be transported alone with one staff person.
- Consider the following to accommodate single children:
  - Modify bus or van routes so single children are not picked up first or dropped off last.
  - Use a bus aide if available.
  - Pick up and drop off children in groups.
  - Modify staff schedules to ensure multiple staff are present.

**Exceptions to policy**

Exceptions to the one-on-one policy can be made under the following circumstances:

- When delivering medical or counseling services by a licensed, trained therapist or similar professional (e.g., counselors, social workers).
- When the emotional or physical safety of a member is at risk and a private, one-on-one communication is deemed necessary by AYCC leadership.
- In emergency situations that could create a safety risk, exceptions can be made (e.g., if a member is not picked up by a parent and leaving them alone at the AYCC could be a safety risk).

Should exceptions need to be made, the AYCC shall have policies in place to monitor interactions, including but not limited to:

- Disclosing the meeting to AYCC leadership and regularly checking in with the member and adult during conversations.
- Placing time limits on conversations.
- Meeting in rooms with clear sight lines (e.g., rooms with windows or glass doors).
- Documenting the interaction.
- In an emergency, disclosing the situation to another staff member before engaging in one-on-one interaction.

## **Facility Supervision and Restroom Policy**

### **SUPERVISION**

The AYCC is committed to providing a safe environment. All activities and program spaces shall always be under continuous supervision by sight or sound (for restroom supervision) by an appropriate adult staff (18 or over). To ensure appropriate supervision, staff, and volunteers:

- Must abide by the prohibition of private one-on-one interaction policy.
- Must abide by all the organization's disciplinary policies and procedures.
- Must ensure that at least one adult staff (18 and over) is present when supervising youth program members.
- Must always maintain proper supervision ratios.
- Must be trained on appropriate supervision tactics and behavior patterns.
- Must ensure that all youth staff and volunteers are supervised by an adult (18 and over) staff member.
- Must immediately notify AYCC leadership and/or submit written reports detailing supervision issues, accidents, or critical incidents.
- Must never use electronic devices such as cell phones, PDAs or other communication devices while supervising members unless for AYCC purposes, as defined in the Acceptable Technology Use Policy.

### **RESTROOM USAGE**

The AYCC is committed to providing a safe, clean environment and enforces the following restroom policy for members, staff, volunteers, and other adults.

- There will be either a designated adult restroom or procedures to ensure adults and minors never utilize a restroom at the same time.
- Have single-user restrooms or multi-user restrooms with single stalls that can be secured from the inside.
- When using restrooms at public facilities during field trips, a minimum of three youth will be escorted by one staff member, who will wait outside the main entrance of the restroom.

### **RESTROOM MONITORING**

Restrooms shall be regularly monitored by designated staff according to a schedule set by AYCC leadership. Monitoring includes walk-throughs, inspections and/or any (but not necessarily all) of the best practices outlined below:

- Implementing procedures to limit the number of children using restrooms at the same time.
- Prohibiting younger children and teens from sharing a restroom.
- Positioning staff near restroom entries to maintain auditory supervision of space.
- Designing or renovating multi-user restrooms to eliminate outer doors, while maintaining privacy with individual stalls.

Staff observing unacceptable restroom conditions or incidents shall:

- Immediately notify AYCC leadership of the incident.
- Document, in writing, restroom conduct incidents and report them to AYCC leadership as soon as possible in compliance with the AYCC's Incident Reporting Policy.

**ENTRANCE AND EXIT CONTROL**

All facility entries and exits shall be controlled and monitored by paid adult staff (18 or over) during all hours of operation, along with a system to monitor and track everyone who is in the facility.

All exit doors shall have an audible alarm to discourage unauthorized use to exit or enter the facility. Only designated adult staff (18 or over) shall be authorized to possess keys and/or badges to open any facility. If an employee is supervising a scheduled activity, they shall be responsible for the security of their program space.

**FACILITY CONDITION**

All program spaces shall have clear lines of visibility and be monitored by adult staff when in use. Areas that are not in use shall remain locked and only accessible by adult staff.

All interior and exterior spaces, hallways, stairs, and stairways shall be monitored, maintained, well-lit, clean, and free of hazards and obstructions. All storage closets and other unused spaces are to be locked during operational hours.

Damages to facilities shall be repaired in a reasonable manner. Damages that pose imminent risk to the health and safety of members, staff or volunteers shall be repaired immediately. If immediate repair to damage that poses imminent risk is not possible, AYCC leadership shall determine whether temporary or permanent closure of the facility may be required. Any damage to a facility that results in an incident deemed critical to the organization shall be reported to the appropriate authorities as a critical incident.

**FOOD AND DRINK**

Any distribution, preparation, or consumption of food and/or drink at any facility shall comply with all applicable food services sanitation and public health codes. If food is prepared and served on site, required city or county health department inspection certificates shall be posted. Any dangerous kitchen utensils, including knives, shall be properly and securely stored.

## **Transportation Policy**

The AYCC is committed to providing a safe environment and enforces the following transportation policy for members, staff, volunteers, and other adults. The AYCC only provides transportation to and from the AYCC and various approved off-site locations. The AYCC only transports youth in approved vehicles or other vehicles approved by AYCC leadership.

### **DRIVERS:**

- Must allow for DMV background check and be cleared to transport youth per the barrier crime policy of the organization.
- Must keep an updated list of all youth who are transported to and from the AYCC and AYCC-related activities.
- Must confirm that no children are left on a vehicle after every trip (based on a seat-by-seat scan of each vehicle); log must be signed daily to ensure compliance.
- Must perform regular checks to ensure that all members are picked up and dropped off at the appropriate times and locations.
- Must submit written reports detailing issues or incidents involving transportation of members to and from the AYCC or to and from AYCC-related activities.
- Must only transport members in official AYCC vehicles.
- Must ensure that at least three individuals are present when transporting members. If one child remains to be dropped off, two adults (18 or over) must be present in vehicle.
- Must never transport AYCC members in personal vehicles.
- Must never use cell phones, PDAs or other communication devices while transporting members to and from the AYCC or AYCC-related activities.

### **VEHICLE**

- Each agency vehicle should meet all local, state, and federal inspection and licensing requirements.
- Each vehicle should be inspected as outlined by DMV by staff before every trip for which youth are being transported; any problems with the vehicle must be addressed promptly.
- Regular maintenance should be performed on vehicles and documents/records reflecting that maintenance should be maintained.
- Each vehicle must provide a seat belt for every passenger and fully comply with state and federal seat belt regulations.
- Each vehicle must have a complete first-aid kit that satisfies state licensing requirements.
- Each vehicle must have a working and current fire extinguisher that satisfies state licensing requirements.
- Each vehicle must have reflective traffic warning signs (e.g., triangles or flares) that are stored securely during transport.
- The vehicle must be clean and well maintained and exterior physical damage must be repaired promptly.

#### **SHARED-USE RESTROOMS**

- On a field trip or when using a public restroom, youth shall never enter the restroom alone unless it is a single-stall restroom that is empty.
- Youth shall follow the “rule of three” in using public restrooms, with at least two youth and an adult walking to the restrooms and three youth entering a multi-stall facility together. The adult will remain outside the restroom door to provide auditory surveillance.
- Whenever possible, staff/volunteers will monitor and clear public restrooms before use by members to ensure that the facility is free of adults – and clear of youth not involved in the AYCC program – before allowing youth to use the facilities. Alternatively, staff members will stand in the restroom doorway and/or hold the door at least partially open when supervising member use of public restrooms. Staff may position themselves inside the restroom near the sinks if positioning at the door is not feasible or is deemed ineffective.

In a shared-use facility, Boys & Girls Clubs will utilize the best practice of shutting the exterior door to the restroom and using an “Occupied” sign outside of the door to alert others that they must wait until AYCC members have exited the restroom before they can enter.

#### **ACCIDENT OR EMERGENCY PROTOCOL**

- Driver should immediately notify AYCC leadership if there is a delay or issue (e.g., breakdown, accident, emergency) with transporting members to and from the AYCC or AYCC -related activities.
- Staff shall immediately inform AYCC leadership if a staff member, volunteer, or board member violates this policy. In such case, the organization will take appropriate disciplinary action, up to and including termination.

Through the appropriate use of AYCC and community resources, Boys & Girls Clubs strive to mitigate the immediate effects of an emergency and its long-term effects on AYCC operations and mission by being prepared to effectively respond to and recovery from an emergency.

## **Screening and Onboarding Policy**

The AYCC is committed to selecting and retaining effective staff and volunteers to serve our youth. As part of the selection process background checks and screening procedures are conducted in accordance with this policy.

### **BACKGROUND CHECKS**

For safety reasons, the AYCC performs background checks on all employees, board members and identified volunteers and contractors. All background checks are conducted in accordance with federal, state, Boys and Girls Club and/or YMCA requirements. Pre-employment background checks will be required on all final applicants who have been offered a position. Background checks requiring annual renewal will be conducted on member-facing employees every year or more frequently in keeping with the requirements of our licensing and the Boys and Girls Club. The specific background checks performed may vary based on your job.

Background check results will be reviewed in accordance with the requirements of licensing, Boys & Girls Club and/or YMCA and may result in an applicant not being hired or an existing employee's employment being terminated. Employees who are rehired within 120 days of their separation date will not be required to have new background checks run unless they are close to the annual recertification date.

Employees convicted of a crime or substantiated by a federal or state entity for abuse/neglect after becoming an employee of AYCC, are required to report the information within 24 hours of the conviction/substantiation. Failure to do so could result in disciplinary action up to and including termination.

### **Types of Background Checks:**

<b>Type of Background Check</b>	<b>Requirements</b>	<b>Renewal</b>
Maine State Background Check	All offered applicants, employees, volunteers & board members	Annually for all employees, volunteers and board members
National Criminal, Social Security and Sex Offender Check	All offered applicants, employees, volunteers & board members	Annually for all employees, volunteers and board members
DHHS Abuse & Neglect Check	All offered applicants except licensed child care & minors	Every 5 years for all employees except licensed child care
Fingerprinting	All offered applicants in licensed child care except minors	Every 5 years for all licensed child care employees
Parental Consent	All minors (under the age of 18)	Each renewal while still a minor
Driving Record Check	Any offered applicant who will drive a company vehicle or leased vehicle for AYCC	Annually for defined employees

### **Applicants & Employees in Licensed Child Care Program**

A prospective child care employee may not begin working for AYCC until DHSS has confirmed eligibility through fingerprinting. Employees and prospective employees will receive a Child Care Provider Letter of Eligibility sent to their home stating eligibility to work with children. Employees must furnish AYCC with the Child Care Provider Letter of Eligibility that indicates they are eligible to be employed or they may be inactivated until the letter is received.

### **Disqualification to Employment**

AYCC is prohibited from hiring or engaging potential staff, board members or volunteers - or continuing to employ or engage current staff, board members or volunteers - who have direct, repetitive interaction with youth if such individual:

- Refuses to consent to a criminal background check;
- Makes a false statement in connection with such criminal background check;
- Is registered or required to be registered on a state or national sex offender registry;
- Has been convicted of a felony consisting of, but not limited to:
  1. Murder
  2. Child abuse
  3. Domestic violence
  4. Abduction or human trafficking
  5. A crime involving rape or sexual assault
  6. Arson
  7. Weapons
  8. Physical assault or battery
  9. Drug possession, drug use or distribution of drugs in the last five years; or
  10. Has been convicted of any misdemeanor or felony against children, including child pornography.

In addition, the Maine Department of Health & Human Services has a “Matrix of Disqualifying Criminal Convictions” which will be followed for our licensed childcare program. The AYCC reserves the right to modify this policy at any time without notice.

### **INTERVIEWING**

The AYCC will conduct in-person behavioral-based interviews with every candidate for employment or program volunteer service.

### **REFERENCE CHECKS**

The AYCC conducts reference checks on any candidate for employment or volunteer with direct repetitive contact with young people. Should candidates for employment have previous experience with a Boys & Girls Club or YMCA, information on the candidate’s eligibility for rehire/volunteering must be obtained from all previous Boys & Girls Clubs and YMCAs for which the candidate worked prior to extending an offer for employment or volunteer service. Additionally, the AYCC provides reference materials when asked for by other Member Organizations.

### **STAFF AND VOLUNTEER ONBOARDING**

Upon offer of a position, each new AYCC employee shall receive and confirm in writing receipt of an up-to-date employee policies and procedures manual or handbook that, at a minimum, articulates current:

- Conditions of employment;
- Benefits;
- Rights and responsibilities of employees;
- AYCC safety policies; and
- Any other important employment-related information.

Before working with any youth members, all staff and volunteers at a minimum shall be given an orientation that includes an overview of the following:

- The organization's mission, goals, policies and procedures and schedule;
- Job descriptions and performance standards for their position;
- The needs and other relevant characteristics of program participants, including cultural and socioeconomic characteristics;
- Personnel and volunteer policies and procedures, including expectations regarding work hours and schedules, breaks and planning time;
- Operational policies and procedures related to safety, supervision, transportation, facilities, emergency operations, etc.; and
- Completion of the required Child Abuse Prevention Trainings approved by Maine DHHS & BGCA.

## **Drug- and Alcohol-Free Workplace Policy**

The AYCC is committed to providing a safe environment for members, staff, and volunteers. To further ensure their safety, the organization maintains a drug- and alcohol-free workplace. The unlawful or improper use of drugs – including marijuana, controlled substances, or alcohol in the workplace – presents a danger to everyone. The organization also has a duty to comply with the requirements of the Drug-Free Workplace Act of 1988.

- Employees are prohibited from reporting to work or working while under the influence of alcohol and/or illegal or unauthorized drugs.
- Employees are prohibited from reporting to work or working when the employee is using any legal drugs; exceptions can be made in accordance with state law when the use is pursuant to a doctor's orders and the doctor has advised the employee that the substance does not adversely affect the employee's ability to safely perform his or her job duties. Employees taking any legal drugs that potentially affect job safety or performance are responsible for notifying their supervisor and/or AYCC leadership so that a determination of job performance or a reasonable accommodation can be made. An employee may not be permitted to perform his or her job duties unless such a determination or reasonable accommodation has been made.
- Employees are prohibited from engaging in the unlawful or unauthorized manufacturing, distribution, dispensing, sale or possession of illegal drugs and alcohol in the workplace, including on organization paid time, on organization premises, in organization vehicles or while engaged in organization activities.
- Employees must notify their supervisor and/or AYCC leadership immediately of any criminal drug or alcohol violation.
- Employment with the organization is conditional upon full compliance with the foregoing drug- and alcohol-free workplace policy. Any violation of this policy might result in disciplinary action, up to and including discharge.

### **SMOKING POLICY**

The AYCC will comply with all applicable federal, state and local regulations regarding non-smoking in the workplace in order to provide a work environment that promotes productivity and the well-being of its employees. Smoking in the workplace can adversely affect members, employees and volunteers. Accordingly, smoking is restricted at all its facilities and grounds. Smoking is defined to include the use of any tobacco-containing products, including cigarettes, cigars and pipes, as well as the use of electronic cigarettes (e-cigarettes) and vaporizers. Smoking is prohibited at all AYCC properties except for external areas where it is specifically authorized. The smoking policy applies to employees, volunteers and members while on AYCC premises or during AYCC activities (on or off site).

### **REASONABLE SUSPICION**

Staff and or volunteers shall immediately notify AYCC leadership of any action by an employee or volunteer who demonstrates an unusual pattern of behavior suggesting that they are under the influence of drugs or alcohol. AYCC leadership will determine whether the employee should be examined

by a physician or clinic and/or tested for drugs or alcohol in accordance with the AYCC drug-testing policies. Employees and volunteers believed to be under the influence of drugs or alcohol will be required to leave the premises. Any illegal drugs or drug paraphernalia will be turned over to the appropriate law enforcement agency and may result in criminal prosecution.

Commented [LC1]: Where is the testing policy? I added it below.

Examples of behavior suggesting that employees or volunteers are under the influence of drugs or alcohol include but are not limited to:

- Odors (smell of alcohol, body odor or urine);
- Movements (unsteady, fidgety, dizzy);
- Eyes (dilated, constricted or watery eyes or involuntary eye movements);
- Face (flushed, sweating, confused or blank look);
- Speech (slurred, slow, distracted mid-thought, inability to verbalize thoughts);
- Emotions (argumentative, agitated, irritable, drowsy);
- Actions (yawning, twitching); or
- Inactions (sleeping, unconscious, no reaction to questions).

Unusual patterns of behavior that may suggest drug or alcohol misuse include but are not limited to:

- Repeatedly calling in sick;
- Being absent directly before or after holidays and weekends;
- Repeatedly damaging inventory or failing to meet reasonable work schedules; and
- Being involved in frequent accidents that can be related to the use of drugs or other substances

#### **INSPECTION AND TESTING**

The AYCC reserves the right to take any and all appropriate and lawful actions necessary to enforce this drug- and alcohol-free workplace policy, including but not limited to the inspection of organization-issued lockers, desks or other suspected areas of concealment, as well as an employee's personal property when the organization has reasonable suspicion to believe that the employee has violated this drug- and alcohol-free workplace policy (see "Reasonable Suspicion" above).

Screening, testing and security measures may be used as methods of enforcement, as permitted by applicable state law. It is a violation of this policy to refuse to submit to testing. Tests that are paid for by the organization are the property of the organization, and the examination records will be treated as confidential and held in separate medical files. However, records of specific examinations will be made available, if required by law or regulation, to the employee, persons designated and authorized by the employee, public agencies, relevant insurance companies and/or the employee's doctor.

## **DRUG & ALCOHOL TESTING POLICY**

The safety and well-being of our drivers, staff, members, camp participants and the public requires that our bus drivers perform their duties free from the effects of alcohol and/or drugs. A drug-free workplace is especially important to the transportation industry. A bus driver who uses or abuses alcohol and/or drugs is a hazard to the Boys and Girls Club and YMCA at the Alford Youth & Community Center, the general public, staff members, camp participants and him/herself.

In order to ensure safe transportation and provide for an efficient and drug-free workplace while complying with the Federal Motor Carrier Safety Regulations, The Boys and Girls Club and YMCA at the Alford Youth & Community Center has adopted this policy.

### **Program Administrator:**

The Human Resources Director has been designated by this company as the Alcohol/Drug Testing Program Administrator. The Program Administrator will handle information on all tests of covered bus drivers confidentially. The Program Administrator may provide such information as necessary to the supervisor to enable him/her to take proper disciplinary action as warranted. The Program Administrator may also release test information to this company's Substance Abuse Professional to use to evaluate and recommend appropriate follow-up.

### **Drivers Subject To Testing:**

All bus drivers who must have a commercial driver's license to perform duties that are considered safety-sensitive, will be subject to the alcohol and/or drug testing as outlined in this policy and required by Title 49 Code of Federal Regulations Part 382.

### **Driver Compliance With Regulation:**

All drivers subject to alcohol and drug testing must be in compliance with the regulations and this policy at all times while in a working status for The Boys and Girls Club and YMCA at the Alford Youth & Community Center. This will include all time spent driving a commercial vehicle as well as time spent performing safety-sensitive functions or just before or just after performing safety-sensitive functions.

Safety-Sensitive Function means all time from the time a driver begins to work or is required to be in readiness to work until the time he/she is relieved from work and all responsibility for performing work.

Substance Tested for (DOT 5 - Test and Alcohol) as specified in 49 CFR Part 40:

The following substances will be tested for to determine their presence:

1. Alcohol
2. Amphetamines (Amphetamine and Methamphetamine)
3. Cocaine Metabolites
4. Marijuana Metabolites
5. MDA-Analogues (MDA and MDMA)
6. Opioids (Morphine, Codeine, 6-Acetylmorphine, Hydromorphone, Hydrocodone, Oxycodone, Oxycodone)
7. Phencyclidine (PCP)

Prohibited Conduct:

During the time that drivers are performing safety-sensitive functions, they shall not:

1. Report to and/or remain on duty with an alcohol concentration of 0.04 or greater;
2. Possess any alcohol;
3. Use any alcohol;
4. Use any alcohol within four hours of going on duty;
5. Use any alcohol for eight hours after an accident which will require the driver to be tested for alcohol or until tested;
6. Refuse to submit to a required alcohol and/or controlled substances test;
7. Report to or remain on duty when using any controlled substance, except when under a physician's orders **AND** the physician has informed the driver that the use will not effect the safe operations of a commercial vehicle;
8. Report to or remain on duty if he/she has tested positive for controlled substance.

Tests Required:

All drivers who are required to be tested for alcohol and/or controlled substance use or misuse will be tested under the following circumstances:

1. **Pre-employment or pre-use.** All applicants for jobs requiring a commercial driver's license and/or current staff transferring to a job which requires a commercial driver's license will be required to be tested for the use of controlled substances.
2. **Random.** All drivers are subject to random testing for alcohol and controlled substance at rates determined by the Federal Motor Carrier Safety Administrator.
3. **Post-accident.** Drivers will be alcohol and controlled substance tested in **all** accidents.
4. **Reasonable suspicion.** All drivers that exhibit signs and/or symptoms of alcohol and/or controlled substance use or misuse, which are observed by a trained company supervisor, while performing safety sensitive functions or just before or just after performing safety sensitive functions will be required to submit to an alcohol and/or controlled substance test.
5. **Return to duty.** A driver, who previously tested positive for alcohol and/or controlled substance, must submit to a return to duty alcohol and/or controlled substance test. The results of the test must be obtained by the motor carrier and be negative before the driver may be allowed to perform a safety sensitive function.
6. **Follow-up.** A driver who previously tested positive and has returned to duty must submit to at least six (6) alcohol and/or controlled substance tests during the first 12 months after returning to work. Follow-up tests will be unannounced and may continue for up to sixty (60) months after returning to work. Any follow-up tests will be at the direction of the Substance Abuse Professional.

The Boys and Girls Club and YMCA at the Alford Youth Center will provide each driver subject to the Federal Motor Carrier Safety Regulations a copy of this policy. In addition, this company will provide printed material which describes the effects of alcohol and/or controlled substance use or abuse on the

individual's health, work and personal life, as well as information on the signs and symptoms of an alcohol or controlled substances problem.

### **AYCC Technology Acceptable Use Policy**

The AYCC is committed to providing a safe use of technology and online safety for members, staff and volunteers. The acceptable use policy provides the framework for those safety practices and procedures.

#### **AYCC MEMBER USAGE**

Before a youth member will be allowed to use AYCC technology equipment or their personal device, both the member and his/her parent/guardian will need to read and sign the Technology Acceptable Use policy and return it to the AYCC. Under the Technology Acceptable Use policy, the following relevant principles shall apply:

**AYCC devices** shall include any and all AYCC-owned existing and/or emerging technologies and devices that can take photographs, play and record audio or video, input text, upload and download content and/or media and transmit or receive messages or images.

**Personally owned devices** shall include any and all member-owned existing and/or emerging technologies and devices that can take photographs, play and record audio or video, input text, upload and download content and/or media and transmit or receive messages or images.

**AYCC purposes** shall include program activities, career development, communication with experts and/or AYCC peer members, homework and AYCC activities. Members are expected to act responsibly and thoughtfully when using technology resources. Members bear the burden of responsibility to inquire with staff when they are unsure of the permissibility of a particular use of technology prior to engaging in its use.

**Authorized use:** AYCC devices and personally owned devices are permitted for use during approved AYCC times for AYCC purposes and in approved locations only. The AYCC expressly prohibits the use of AYCC devices or personally owned devices in locker rooms, restrooms and other areas where there is an expectation of privacy.

**Appropriate use:** Members may not use any technology to harass, threaten, demean, humiliate, intimidate, embarrass or annoy their peers or others in their community. Any inappropriate use of a AYCC or personally owned device, as determined by AYCC staff, can lead to disciplinary action including but not limited to confiscation of the device, immediate suspension from the AYCC, termination of membership or other disciplinary actions determined to be appropriate to the AYCC's existing disciplinary policies including, if applicable, referral to local law enforcement.

**Monitoring and inspection:** The AYCC reserve the right to monitor, inspect, copy and review any personally owned device that is brought to the AYCC. Parents/guardians will be notified before such an inspection takes place and may be present, at their choice, during the inspection. Parents/guardians may refuse to allow such inspections. If so, the member may be barred from bringing personally owned devices to the AYCC in the future.

**Loss and damage:** Members are responsible for keeping devices with them at all times. Staff are not responsible for the security and condition of the member's personal device. Furthermore, the AYCC is not liable for the loss, damage, misuse or theft of any personally owned device brought to the AYCC.

Any inappropriate or unauthorized use of a AYCC or personally owned device, as determined by AYCC staff, can lead to disciplinary action including but not limited to confiscation of the device, immediate suspension from the AYCC, termination of membership or other disciplinary actions determined to be appropriate to the AYCC's existing disciplinary policies, including, if applicable, referral to local law enforcement.

Members must be aware of the appropriateness of communications when using AYCC or personally owned devices. Inappropriate communication is prohibited in any public or private messages, as well as material posted online. Inappropriate communication includes but is not limited to the following:

- Obscene, profane, lewd, vulgar, rude, inflammatory, threatening or disrespectful language or images typed, posted or spoken by members;
- Information that could cause damage to an individual or the AYCC community or create the danger of disruption of the AYCC environment;
- Personal attacks, including prejudicial or discriminatory attacks;
- Harassment (persistently acting in a manner that distresses or annoys another person) or stalking of others;
- Knowingly or recklessly posting false or defamatory information about a person or organization; or
- Communication that promotes the destruction of property, including the acquisition or creation of weapons or other destructive devices.

If a member is told to stop sending communications, that member must cease the activity immediately.

### **Cyberbullying**

Members may not utilize any technology to harass, threaten, demean, humiliate, intimidate, embarrass or annoy their peers or others in their community. This behavior is cyberbullying, which is defined as bullying that takes place using emerging technologies and devices. Any cyberbullying that is determined to disrupt the safety and/or well-being of the AYCC, AYCC members, AYCC staff or community is subject to disciplinary action.

Examples of cyberbullying include, but are not limited to:

- Harassing, threatening or hurtful text messages, emails, or comments on social media.
- Rumors sent by email or posted on social networking sites.
- Embarrassing pictures, videos, websites, or fake profiles.

Members may not attempt to gain unauthorized access to the AYCC's network, or to any other computer system through the AYCC's network. This includes attempting to log in through another person's account or accessing another person's files. Members may not use the AYCC's network to engage in any illegal act, including, but not limited to, arranging for the purchase or sale of alcohol, tobacco or other drugs; engaging in criminal activity; or threatening the safety of another person. Members may not make deliberate attempts to disrupt the computer system or destroy data by spreading computer viruses.

**Monitoring and inspection:** The AYCC reserves the right to monitor, inspect, copy and review files stored on AYCC-owned devices or networks. In addition, the AYCC reserves the right to inspect and/or review personally owned devices that are brought to the facility. Parents/guardians will be notified before such an inspection takes place and may be present, at their choice, during the inspection. Parents/guardians may refuse to allow such inspections, but the member may be barred from bringing personally owned devices to the AYCC in the future.

**Internet access:** Personally owned devices used at the AYCC must access the internet via the AYCC's content-filtered wireless network and are not permitted to directly connect to the internet through a phone network or other content service provider. The AYCC reserves the right to monitor communication and internet traffic, and to manage, open or close access to specific online websites, portals, networks or other services. Members must follow AYCC procedures to access the AYCC's internet service.

**Loss and damage:** Members are responsible for keeping the personal device with them at all times. Staff are not responsible for the security and/or condition of the member's personal device. Furthermore, the AYCC shall not be liable for the loss, damage, misuse or theft of any personally owned device brought to the AYCC.

**Parental notification and responsibility:** While the AYCC Technology Acceptable Use Policy restricts the access of inappropriate material, supervision of internet usage might not always be possible. Due to the wide range of material available on the internet, some material might not fit the particular values of members and/or their families. Because of this, it is not considered practical for the AYCC to monitor and enforce a wide range of social values in student use of the internet. If parents/guardians do not want members to access information beyond the scope of the Technology Acceptable Use Policy, they should instruct members not to access such materials.

**Digital citizenship:** AYCC members shall conduct themselves online in a manner that is aligned with the AYCC Code of Conduct. The same rules and guidelines members are expected to follow offline (i.e., in the real world) shall also be followed when online. Should a member behave online in a manner that violates the AYCC Code of Conduct, that member shall face the same discipline policy and actions they would if their behavior had happened within the physical AYCC environment.

**AYCC-owned-and-operated technology:** Members are expected to follow the same rules and guidelines when using AYCC-owned technology. AYCC technology and systems are the property of the AYCC, are intended to be used for AYCC purposes and are to be used during approved times with appropriate supervision. AYCC members shall never access or use AYCC technology or systems without prior approval.

**Digital citizenship and technology safety training:** All members who wish to use AYCC device or equipment will be required to successfully complete a BGCA-provided digital citizenship and technology safety training. This training is required for all members annually.

## **STAFF AND VOLUNTEER USAGE**

Before a staff member can use AYCC technology equipment or a personal device, he/she shall read and sign the Technology Acceptable Use policy and return it to the AYCC. Under the Technology Acceptable Use policy, the following relevant principles shall apply:

**AYCC devices** shall include any and all AYCC-owned existing and/or emerging technologies and devices that can take photographs, play and record audio or video, input text, upload and download content and/or media and transmit or receive messages or images.

**Personally owned devices** shall include any and all staff-owned existing and/or emerging technologies and devices that can take photographs, play and record audio or video, input text, upload and download content and/or media and transmit or receive messages or images.

**AYCC Purposes** include but are not limited to the delivery of program activities, accessing sanctioned training or career development opportunities, communication with experts and/or authorized AYCC staff and for AYCC purposes or management of other AYCC activities, such as member check-in or incident reporting. Staff are expected to act responsibly and thoughtfully when using technology resources. Staff bear the burden of responsibility to ask their supervisor when they aren't sure of the permissibility of a particular use of technology prior to engaging in that use.

**Authorized use:** Personally owned devices are permitted for use during approved AYCC times for AYCC purposes and in approved locations only. The AYCC expressly prohibits the use of personally owned devices in locker rooms, restrooms, and other areas where there is an expectation of privacy.

**Appropriate use:** Staff may not use any technology to harass, threaten, demean, humiliate, intimidate, embarrass, or annoy their peers or others in their community. Any inappropriate use of a personally owned device, as determined by a supervisor, can lead to disciplinary action including but not limited to confiscation of the device, immediate suspension from the AYCC, termination of employment or volunteer assignment or other disciplinary actions determined to be appropriate to the AYCC's existing disciplinary policies including, if applicable, referral to local law enforcement.

**Monitoring and inspection:** The AYCC reserve the right to monitor, inspect, copy and review a personally owned device that is brought to the AYCC. Staff may refuse to allow such inspections. If so, the staff member may be subject to disciplinary action up to and including termination.

**Loss and damage:** Staff are responsible for keeping devices with them at all times. Supervisors and the AYCC at large are not responsible for the security and condition of the staff member's personal device. Furthermore, the AYCC is not liable for the loss, damage, misuse or theft of any personally owned device brought to the AYCC.

Any inappropriate or unauthorized use of a personally owned device, as determined by a supervisor, can lead to disciplinary action including but not limited to confiscation of the device, immediate suspension from the AYCC, termination of employment or volunteer assignment or other disciplinary actions determined to be appropriate to the AYCC's existing disciplinary policies, including, if applicable, referral to local law enforcement.

Inappropriate communication includes but is not limited to:

- Obscene, profane, lewd, vulgar, rude, inflammatory, threatening or sexual content or disrespectful language or images typed, posted or spoken by staff or members.

- Information that could cause conflict.
- Personal attacks, including prejudicial or discriminatory attacks.
- Harassment (persistently acting in a manner that distresses or annoys another person) or stalking others.
- Knowingly or recklessly posting false or defamatory information about a person or organization.
- Communication that promotes the destruction of property, including the acquisition or creation of weapons or other destructive devices.

If a staff member is told to stop sending communications, he/she must cease the activity immediately.

Staff must be aware of the appropriateness of communications when using AYCC or personally owned devices. Inappropriate communication is prohibited in any public or private messages, as well as material posted online.

Staff may not use any technology to harass, threaten, demean, humiliate, intimidate, embarrass, or annoy others. This behavior is cyberbullying, which is defined as bullying that takes place using existing or emerging technologies and devices. Any cyberbullying that is determined to disrupt the safety and/or well-being of the AYCC, AYCC staff, AYCC members or community is subject to disciplinary action.

Examples of cyberbullying include but are not limited to:

- Harassing, threatening or hurtful text messages, emails, or comments on social media.
- Rumors sent by email or posted on social networking sites.
- Use of embarrassing pictures, videos, websites, or fake profiles.

**Communication with Youth members:** Staff may never use personal devices to communicate directly with a single AYCC minor member. Proper protocol dictates that all communication between staff and AYCC members must include an additional staff member and at least two AYCC members. This also includes overnight events such as Keystone Conferences and Youth of the Year events.

**Monitoring and inspection:** The AYCC reserves the right to monitor, inspect, copy and review a personally owned device that is brought to the AYCC. Staff may refuse to allow such inspections. If so, the staff member may be subject to disciplinary action up to and including termination.

**Internet access:** Personally owned devices used at the AYCC must access the internet via the AYCC's content-filtered wireless network and are not permitted to directly connect to the internet through a phone network or other content service provider. The AYCC reserves the right to monitor communication and internet traffic and to manage, open or close access to specific online websites, portals, networks or other services. Staff must follow AYCC procedures to access the AYCC's internet service.

**Loss and damage:** Staff are responsible for keeping devices with them at all times. Supervisors and the AYCC at large are not responsible for the security and condition of any staff member's personal device. Furthermore, the AYCC is not liable for the loss, damage, misuse or theft of any personally owned device brought to the AYCC.

**Password and access:** To prevent unauthorized access, devices must lock themselves and require authentication using the strongest features available on the device. A minimum standard would require

a typed password of at least six characters or numbers, though some devices utilize fingerprint or other biometric technologies.

## **Emergency Operations Plan Policy**

### **EMERGENCY OPERATIONS PLAN (EOP)**

The AYCC shall create and maintain an Emergency Operations Plan (EOP). At minimum, the plan shall encompass the following elements:

- Mitigation, preparedness, response, and recovery for the following types of emergencies:
  - Fire
  - Weather (tornado, flooding, hurricane, etc.)
  - Lockdown (for interior or exterior threat)
  - Bomb threat
  - Suspicious package
- Training/drill schedule and reporting procedures for staff, volunteers, and members.
- Developed and shared with local first responders, such as fire department and law enforcement agencies.

### **EOP ANNUAL REVIEW**

The AYCC leadership will maintain a board-led safety committee that regularly focuses on safety and will have oversight and responsibility for the emergency operations plan. The board-led safety committee will be responsible for reviewing and updating the emergency operations plan annually.

### **FIRST AID AND CPR TRAINING**

The AYCC always maintains a minimum of one CPR- or first-aid-trained staff on site during all operating hours when members are being served.

### **KEY DEFINITIONS**

**Emergency:** An emergency is any event, natural or man-made, whether expected or unexpected, that places life or significant AYCC assets in danger or threatens the ability to conduct normal business operations and usually involves abnormal time constraints and resource responses.

**Mitigation:** Mitigation is the effort to reduce loss of life and property by lessening the impact of disasters or emergencies. For mitigation to be effective, we need to take action now — before the next emergency occurs — to reduce human and financial consequences later.

**Preparedness:** Preparedness helps everyone act quickly and decisively in the face of a disaster or emergency and can minimize loss of property and prevent death and injury. An effective emergency plan should include steps to ensure that those with disabilities or special needs are provided with a proper evacuation strategy.

## **Incident Reporting and Investigation Policy**

Clear reporting policies and procedures are an important element in responding to incidents that might occur in AYCC programs & facilities. Staff and volunteers must at a minimum immediately report and document all safety incidents that might affect staff, volunteers, members, and others who visit AYCC Facilities.

### **GENERAL INCIDENT DESCRIPTION**

Safety incidents can include but are not limited to:

- Inappropriate activity between adults (18 and over) and youth;
- Inappropriate activity between multiple youth;
- Allegations of abuse;
- Bullying behavior;
- Inappropriate electronic communications between adults (18 or over) and youth;
- Minor and major medical emergencies;
- Accidents, including slips and falls;
- Threats made by or against staff, volunteers and/or members;
- Physical assaults and injuries, including fights;
- Missing children;
- Criminal activity, including theft and robbery; and
- Other incidents as deemed appropriate by AYCC leadership.

Safety incidents include those that occur during AYCC programs, on AYCC premises and/or during a AYCC - affiliated program or trip.

### **INTERNAL INCIDENT REPORTING**

Any employee or volunteer who becomes aware of an incident, as defined in this policy, shall immediately complete an incident report, and submit the incident to AYCC leadership.

The following information shall be included on an Incident Report:

- Date and location
- Incident details (if applicable)
- Witnesses and contact information
- Names of all involved (youth and staff if applicable)
- All notifications made (first responders, parents, leadership, etc.)

### **EXTERNAL INCIDENT REPORTING**

The AYCC follows all applicable mandated reporting statutes and regulations and all applicable federal, state, and local laws (including those around licensing, for licensed organizations) for the protection and safety of youth. Types of incidents reported include but are not limited to:

- Inappropriate activity between adults (18 or over) and youth;
- Inappropriate activity between multiple youth;
- Allegations of child abuse;
- Any form of child pornography;
- Criminal activity, including assault, theft, and robbery; or
- Children missing from the premises.

### **INCIDENT INVESTIGATION**

The AYCC takes all incidents seriously and is committed to supporting external investigations of all reported incidents and allegations or internal investigations by the Safety Committee when not an externally reportable incident.

Federal, state, and local criminal and or mandated child abuse reporting laws must be complied with before any consideration of an internal investigation. The internal investigation should never be viewed as a substitute for a required criminal or child protective services investigation.

In the event that an incident involves an allegation against a staff member, volunteer or AYCC member, the AYCC shall suspend that individual immediately (employees with pay) and maintain the suspension throughout the course of the investigation.

### **CRITICAL INCIDENT REPORTING**

The AYCC will immediately report any allegation of abuse or potential criminal matter to law enforcement. In addition, the AYCC will report the following critical incidents to BGCA & Y-USA within 24 hours:

- A. Any instance or allegation of child abuse, including physical, emotional, or sexual abuse; sexual misconduct or exploitation (AYCC-related or not) against any child by a current employee or volunteer; or any AYCC -related instance by a former employee or volunteer.
- B. Any instance or allegation of child abuse, including physical, emotional, or sexual abuse; or sexual misconduct or exploitation by a youth towards another youth at a AYCC site or during a AYCC-sponsored activity.
- C. Any child who might have been abducted or reported missing from a AYCC site or AYCC - sponsored activity.
- D. Any major medical emergency involving a child, staff member or volunteer at a AYCC site or during a AYCC -sponsored activity leading to extended hospitalization, permanent injury, or death; or a mental health crisis with a child requiring outside care.
- E. Any instance or allegation of abuse, including physical, emotional, or sexual abuse, sexual misconduct, harassment, or exploitation (AYCC -related or not) involving any staff member; or any AYCC -related instance or allegation of abuse, including physical, emotional, or sexual abuse, sexual misconduct harassment or exploitation against a volunteer or visitor.
- F. Any failure to comply with requirements set forth by childcare licensing agencies or organizations.
- G. Any known or suspected felony-level criminal act committed at a AYCC site or during a AYCC - sponsored activity.
- H. Any misappropriation of organizational funds in the amount of \$10,000 or greater, or any amount of federal funds.
- I. Any criminal or civil legal action involving the organization, its employees, or volunteers, as well as any changes in the status of an open organization-related legal action.
- J. Negative media attention that could compromise the reputation of the AYCC or BGCA or Y-USA brands.
- K. Any other incident deemed critical by the AYCC.

## **Grievance Policy for Parent/Guardians and Participants**

The AYCC believes participants, and parents/guardians have valuable thoughts and insights to share regarding our operations. Accordingly, the AYCC encourages participants and parents/guardians to share opinions, suggestions, concerns, questions and/or grievances about our policies, personnel, and/or other matters impacting the organization.

In general, the best person initially to bring opinions, suggestions, concerns, and/or questions to is the Program Director overseeing the program. However, if a participant, parents/guardian feels the Program Director did not fully address a matter, participants and parents/guardians may direct their opinions, suggestions, concerns, and/or questions to the next level of management or directly to the AYCC's CEO or COO.

To remedy concerns that appear to have been ignored or unresolved after initial reporting, utilize this formal grievance procedure. This procedure provides for a timely, thorough, and objective investigation of the following concerns:

- Inappropriate Behavior by Employees/Volunteers;
- Inappropriate Behavior by Participants;
- Retaliation; and/or;
- Whistleblower complaints.

### **Written Complaint Required for Formal Process**

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 individuals(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 making the complaint.

### **Anonymous Reporting**

If you prefer to make an anonymous report, you may call our partners at the Praesidium Child Safety Helpline 24/7 at 866-607-7233. Praesidium's Helpline provides employees, volunteers, parents, and participants with a way to report suspicious or inappropriate behaviors and policy violations. Anonymously, if desired.

Please note this helpline does not replace any applicable mandated abuse and neglect reporting to state authorities and does not include legal advice.

**Timeline**

Participants or parents/guardians who themselves have a complaint or who are aware of behavior meriting a complaint, must provide the above the described written complaint via email to designated Program Director, COO, or CEO within 10 business days of the incident. Designated AYCC Staff will meet with the participant or parent/guardian to hear their concern and attempt to resolve the complaint within 15 business days.

Following that meeting, the designated AYCC Staff will provide a brief written response to the participant or parent/guardian who brought the complaint no later than 15 business days after the incident that includes brief written findings on the issues raised and relief sought. If the participant or parent/guardian is not satisfied with the written response, the individual who brought the complaint may submit an appeal to the CEO and they will bring the issue before the AYCC's Board Chair within 15 business days. The AYCC's CEO and Board Chair will review the incident and will meet with the participant or parent/guardian to hear their concern and attempt to resolve the complaint. If the Board Chair wishes they can bring the concern before the AYCC's Safety Committee and/or the AYCC's Executive Committee for review.

Following that meeting, the CEO and Board Chair will provide a written response to the participant or parent/guardian who brought the complaint no later than 15 business days that includes brief written findings on the issues raised and relief sought. The YMCA Board Chair is the final arbiter of grievance matters at this organization.

**Investigation**

The CEO or designee 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 parties must cooperate with the investigation. If the organization determines a violation of policy or law has occurred, the organization will take appropriate action, up to and including termination and notification of external authorities.

**Retaliation**

The AYCC strictly prohibits retaliation against participants and/or parents/guardians 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. Participants and/or parents/guardians should report any suspected retaliation to the AYCC CEO 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 individual(s) responsible. The AYCC will not retaliate against any participant or parent/guardian for raising a complaint and will not knowingly permit retaliation by management or other employees.

Publication and Communication to Participant and Parents/Guardians of this Grievance Policy will be made available on the AYCC's website and shared with all participants and parents/guardians through the Parent handbooks for School-Age Child Care & Preschool enrollments.